

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/08	Building a Fairer Newham	BFN1 Spatial Strategy			BFN1.6			Yes	Yes							Connectivity along Water Spaces Through its consultee responses to the various stages of the draft Local Plan the Authority has supported policy that will deliver waterside routes, for example along the River Lea and River Thames, and associated bridge connections. It was noted that Partnership working between the London Boroughs of Newham and Tower Hamlets together with other key stakeholders on the Lea River Park and The Leaway projects was well advanced and it was therefore considered appropriate that this should be reflected in the Local Plan. It is important that opportunities for development to assist in delivering these connections is identified within the vision and infrastructure requirements set out for the Neighbourhoods.		Comment noted.
Reg19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/002	Design	D4 Tall buildings	N13.SA2 East Ham Primark					Blank	No	No					Blank	1. Many issues need to be addressed and rectified in the High St itself before further building of homes can be considered. This should have been done before the recent new builds were undertaken. Eg [...] • High St already dark and a wind tunnel in places due to new high rise buildings. This plan would make this worse. The High St is not wide enough to take the height of building without significant loss of natural light.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy has been misinterpreted because N13.SA2 East Ham Primark site allocation doesn't fall within a Tall Building Zone. The design principles for the site suggest that a mid-rise development (below 21m) is considered the most appropriate form of development to make a contribution to meeting Newham's Housing need whilst sensitively integrating with the scale and massing of the existing urban fabric. Furthermore, the impact of tall buildings has been address through a range of policies in the Local Plan. London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate consideration, including wind and air quality assessments. The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/025	Design	D4 Tall buildings	N4.SA3 Canning Town Holiday Inn													Regarding height, the draft site allocation sets out that “building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16storeys) along Silvertown Way”. It sets out that “massing should step down towards the northern-eastern part of the site to sensitively integrate with the low-rise context”. It is noted that the site also falls within a draft tall building zone that identifies a maximum height parameter of up to 50-metres.		Comment noted

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/026	Design	D4 Tall buildings														We are broadly supportive of the heights proposed within the draft site allocation and the intention to focus taller buildings along Silvertown Way		Support noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/027	Design	D4 Tall buildings	N4.SA3 Canning Town Holiday Inn											No		Our emerging design / massing strategy has sought to respond to the prevailing heights in the immediate context, to include the Effra Gardens development that incorporates heights of up to 16-storeys directly adjacent to the site.	Given the site’s location in the draft tall building zone, we would advocate for the height parameters identified in the draft site allocation to be shown as ‘indicative’. This would allow for flexibility in the design of the building to deliver the most efficient use of land in accordance with national and local policy, and could be managed through the development process with the application of draft policy D4 (Tall Buildings) and London Plan Policy D9, in collaboration with Officers.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/028	Design	D4 Tall buildings	N4.SA3 Canning Town Holiday Inn						No								As per our previous representations, we would also advocate for the indicative height parameters to be stated in metres, rather than stating storeys. This is on the basis that as the Council will be aware, the GLA’s standards require a minimum floor to-ceiling height for residential at 2.5 metres and commercial and other town centre uses could feasibly achieve 3-metres. As such, the inclusion of storey references could be misleading and inaccurate, whereas an indicative maximum parameters on the basis of metres only would be sound and clear in providing robust guidelines for future application proposals.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/038	Design	D4 Tall buildings	N7.SA2 Parcelfor ce											Blank	Blan k																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		

Neighbourhoods Comments to the full Regulation 19 Representations																			
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment
																			effective and will impact the delivery of the LBN's policy vision.
Reg19-E-200	London City Airport		Reg19-E-200/034-c	Design	D4 Tall buildings	N2.SA1 Silvertown Quays		Table 1 Tall Building Zones											[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N2 Area: Silvertown Quays (Royal Victoria) Height Limit: Up to 50m (depending on precinct) Comment: Building or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right end column. Development s above ground level may need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: - N2.SA1 Silvertown Quays: Any development The Council's objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing height limit thresholds for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport's Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add 'subject to airport constraints' to TBZ11: Lyle Park, TBZ13: Canning Town and TBZ21: Excel West] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-d	Design	D4 Tall buildings	N2.SA2 Lyle Park West		Table 1 Tall Buildin g Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N2 Area: Silvertown Quays (Royal Victoria) Height Limit: Up to 50m (depending on precinct) Comment: Building or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right end column. Development s above ground level may need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: [- N2.SA1 Silvertown Quays: Any development] - N2.SA2 Lyle Park West: 40m AGL	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing height limit thresholds for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ11: Lyle Park, TBZ13: Canning Town and TBZ21: Excel West] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-e	Design	D4 Tall buildings	N2.SA4 Thameside West		Table 1 Tall Building Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N2 Area: Silvertown Quays (Royal Victoria) Height Limit: Up to 50m (depending on precinct) Comment: Building or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right end column. Development s above ground level may need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: [- N2.SA1 Silvertown Quays: Any development - N2.SA2 Lyle Park West: 40m AGL] - N2.SA4 Thameside West: Above 40m AGL	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing height limit thresholds for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ11: Lyle Park, TBZ13: Canning Town and TBZ21: Excel West] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-f	Design	D4 Tall buildings			Table 1 Tall Buildin g Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N2 Area: Silvertown Quays (Royal Victoria) Height Limit: Up to 50m (depending on precinct) Comment: Building or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right end column. Development s above ground level may need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: [- N2.SA1 Silvertown Quays: Any development - N2.SA2 Lyle Park West: 40m AGL - N2.SA4 Thameside West: Above 40m AGL] - N2.SA5 Excel West: Above 27m AGL	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing height limit thresholds for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. We did not consider this change to be necessary as Local Plan Policy GWS3 1.e adequately addresses the need to deliver appropriate biodiversity measures within the London City Airport Safeguarded Area. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change: Tall Buildings: D4 - Table 1: tall Building Zones - TBZ21: Excel West: Subject to airport height constraints. which is included in the modification table.

Neighbourhoods Comments to the full Regulation 19 Representations																						
Reg19-E-218	IXDS	RPS	Reg19-E-218/058	Design	D4 Tall buildings	N4.SA5 Canning Town Riverside						Yes	No						Yes	The N4.SA5 site allocation rehearses the Tall Building Zone (TBZ) restrictions that apply to the site through Policy D4. To ensure consistency with IXDS Ltd’s representation on Policy D4, the site allocation wording should account for the changes sought in that representation. Please refer to the IXDS Ltd representation made in relation to Policy D4 for further information.	[Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside] Design principles The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. The main building heights ~~datum~~ should range between 21-32m (ca. 7-10 storeys) with taller buildings where justified in accordance with Policy D4 and the stipulations of TBZ13. ~~is~~ Employment uses should be positioned to buffer the neighbouring Strategic Industrial Location. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses. Separate HGV and pedestrian access should be designed to avoid conflicts between different uses. Vehicular routes should allow for servicing of employment uses and make links to existing routes along Bidder Street. Open space provision should be largely concentrated along the River Lea edge. The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Development should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, creating continuous frontages on Bidder Street and on the riverside. The layout of the site should enable the continuation of the Leaway Walk through the site, providing a continuous walking and cycling route along the edge of the Lea. The site should provide onward connections to Bow Creek Ecology Park, which is located to the south of the site, and the Lea River Park. Routes through and to and from the site should improve access and connectivity to Canning Town Station and District Centre. Development should deliver improved wayfinding to Canning Town Station, being clear and legible, with well-lit and high quality public realm and consider step-free access to the station from the site. Development should deliver active travel improvements along Bidder Street and Stephenson Street, improving the pedestrian and cycling environment along these roads. Development should deliver improvements to the pedestrian routes either side of the A13, and an enhancement of the route to the station via the pedestrian crossing beneath the viaduct located to the north of Canning Town Station. Development should deliver design enhancements to the existing underpass under the A13 on Wharfside Road. The route should allow for safe and convenient uses by pedestrians and cyclists, with clear sightlines and desire lines through the development to the underpass.	This wording change is not supported. Your comments regarding policy D4 are addressed separately. In relation to site allocation design principles, we did not consider this change to be appropriate as removing maximum height parameters will undermine the delivery of policy D4. The Council considers the policy in line with policy D4 and 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				Development should conserve and enhance the Grade II listed Royal Oak Public House in the proximity of the site and its setting. Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6, particularly on the A13 and Bidder Street. Design measures should minimise exposure to noise from the A13. In relation to buildings adjacent to the A13, this could be addressed through careful placement of and heights of buildings adjacent to the road, retention and/or planting of trees as a buffer and the positioning of decks and non-habitable rooms adjacent to the road. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.	
Reg-19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/006	Design	D7 Conservation Areas and ATVs	N13.SA2 East Ham Primark					Blank	No						Blank	Statement – ‘conserve and enhance East Ham Town Centre Conservation Area’ not sure how adding more stories to an existing high building does this.		This policy has been misinterpreted. N13.SA2 East Ham Primark site allocation falls outside TBZ3: East Ham, therefore developments above 21m on the site are not supported. Planning permission for development that can have an impact on the East Ham Town Centre Conservation Area and its setting will be assessed against policies D7 and D9.
Reg19-E-006	Maria Marino		Reg19-E-006/006a	Design	D7 Conservation Areas and ATVs						Blank	Blank						Blank	For example I don’t understand why I the LP proposals unified two conservation areas in Forest Gate depriving Manor Park from the only one existent and not creating any other .		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The process of designating Conservation Areas is governed by separate legislation to that of plan-making, specifically the Planning (Listed Buildings and Conservation Areas) Act 1990. As such the Local Plan cannot, and has not proposed any changes to established conservation areas. Rather, parts of the borough with a similar characteristic have been grouped in the Neighbourhoods section of the Plan in order to facilitate delivery of the local vision for the area. Therefore, Durham Road Conservation Area still falls into Manor Park and Little Ilford neighbourhood boundary line. The Local Plan Policy D7 requires the conservation of existing Conservation Areas and supports the potential for creating new ones.
Reg19-E-033	Thames Water		Reg19-E-033/011	Green and Water Spaces	GWS1 Green spaces	N13.SA3 Former East Ham Gasworks					Blank	No						Blank	In relation to the current Local Plan, we supported the deletion of the MOL designation on the site and security centre at Beckton STW.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/008	Neighbourhoods	H8 Purpose-built student accommodation	N8.SA4 Stratford High Street Bingo Hall					No	No						Blank	FGT therefore conclude that the Draft Submission Local Plan (Regulation 19) June 2024: • Does not currently accord with Policy E10 of the London Plan, which is the most recently adopted development under the Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004; and • Does not meet the ‘soundness’ test set out in paragraph 35 of the National Planning Policy Framework (NPPF, 2023) which requires a local plan to be deliverable over the plan period.		Comment noted.
Reg19-E-231	IDM Properties LLP	Iceni Projects	Reg19-E-231/014	Inclusive Economy	J1 Employment and growth			LMUA9			Yes	No						Yes	[Implication of LMUA Designation] With the principle of development on the site agreed, it is important that this contributes positively to wider placemaking and good planning within LB Newham. The enclosed Design Document [see attached Design Document saved in the folder] , prepared by IDM Developments and submitted as part of these representations, showcases the high-quality proposal that could come forward, delivering 35 homes. With the delivery of new homes a pressing need on all London Boroughs, allowing residential-led development on a very underutilised site would make an important contribution towards this. The site also offers a highly sustainable location for new residential use, and the proposed ‘Three Mills Neighbourhood’ (7) confirms the suitability of residential use within this location, and in addition to Channelsea House, would provide a suitable setting for further residential-led development. <i>[Note: (7) Newham Emerging Local Plan, Policy N7]</i>	[Proposed Alterations Based on the evidence presented above, the following alterations are suggested to the emerging Local Plan:] • The emerging Local Plan should recognise the site as a sustainable location to bring forward residential-led mixed-use development, and the contribution it can make to the boroughs growing housing need. The site should therefore be allocated for either a residential or residential-led mixed use development.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site is assessed as suitable to be a LMUA as informed by the Employment Land Review, which should be employment-led to support employment function at the site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/049	Neighbourhoods	N1 North Woolwich														[We support the provision of a riverside pier which would enable river bus services to be extended to the area. This pier and pump primed operating costs will need to be fully funded through contributions from developments and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided. For clarity, any riverside pier must be separate from, and not impact, Woolwich Ferry operations nor associated vehicle access and holding areas. We also support the principle of Low Traffic Neighbourhoods and the provision of new bridges for walking and cycling to mitigate the severance caused by train tracks subject to funding being secured.] We note that no change has been made in response to this point.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/050	Neighbourhoods	N1 North Woolwich							No							[There is existing bus stand and stop space on Pier Road by the ferry terminal within the N2.SA1 footprint that needs to be retained. and its operations safeguarded. including through application of the agent of change principle. TfL is currently discussing with the developer of the site to the north options for this space. but the principle remains that the capacity for operations must be retained in the vicinity and any changes cannot be funded by TfL] We note that no change has been made to the infrastructure requirements although Policy T1 now explicitly mentions bus stands and the bus stand is included as an existing use on site N1.SA1	Given that there are discussions about the future use of the bus stand and stop space we believe that retention of bus standing should be stated as an explicit infrastructure requirement for site N1.SA1 to ensure soundness	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. The Council recognises the importance of ensuring the Plan is clear and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 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. Provision of bus stops and bus stands (including drivers' facilities) on Pier Road must be maintained.
Reg19-E-013	Transport for London		Reg19-E-013/051a	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway						No							[See comment under N2 above regarding the need to retain bus stand space on Pier Road by the ferry terminal.] We note that no change has been made to the infrastructure requirements although Policy T1 now explicitly mentions bus stands and the bus stand is included as an existing use on site N1.SA1	Given that there are discussions about the future use of the bus stand and stop space we believe that retention of bus standing should be stated as an explicit infrastructure requirement for site N1.SA1 to ensure soundness.	The Council notes that Local Plan Policy T1 to makes specific reference to bus stands, however the bus stands at N1.SA1 are within the red line boundary of the site. The Council recognises the importance of ensuring the Plan is clear and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: N1.SA1 Infrastructure Requirements: Provision of bus stops and bus stands (including drivers' facilities) on Pier Road must be maintained.
Reg19-E-013	Transport for London		Reg19-E-013/051b	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway						No							We attach a plan in appendix B showing Elizabeth line tunnels under site hatched green and areas where TfL have surface ownership shaded green. (The area immediately east of Store Road shaded but not hatched green and within the site is also in shallow tunnel.)	To ensure soundness the following wording should be added as an infrastructure requirement: 'The potential constraint of the Elizabeth line assets on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'	A change to this policy approach has not been made. We did not consider this change to be necessary as 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/033	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/034	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/035	Neighbourhoods	N1 North Woolwich	N1.SA2 Rymill Street					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/036	Neighbourhoods	N1 North Woolwich	N1.SA2 Rymill Street					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-172	Populo Living		Reg19-E-172/001	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													Detailed proposals for this site were approved by Newham's Dec-23 Strategic Development Committee Dec-23 (Application Number: 22/02662/FUL). The proposed layout in the Local Plan ('LP') does not match the approved design for the site.	We suggest that the LP entry is updated to match the approved proposals.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-172	Populo Living		Reg19-E-172/002	Neighbou rhoods	N1 North Woolwic h	N1.SA2 Rymill Street													Whilst the allocation for residential is welcomed, the overall description of development will be unviable to deliver in the context of the wider Plan requirements, most notably the heights of 3-7 storeys to the west and 10 storeys to the east despite being immediately adjacent to a DLR station. This is contrary to the London Plan Policy D1 that states “As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive” and that “the density of development proposals should be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services The site offers an opportunity to deliver significant scale and massing due to various positive attributes such as access to public transport, no residential units to the north so limited impact on existing dwellings direct sunlight, and existing precedence for height with two 19-storey towers immediately southwest of the site. From our work in North Woolwich, we are aware that the City Airport limit would be c.50m height, or approx. 15 storeys. We suggest this would be a more reasonable limit for a development in an area in need of new development and rejuvenation. The Plan outlines key social infrastructure that is required (food store, NHS health centre, local employment space), which will only be viable to deliver if a critical mass of housing can be provided to both pay for the initial construction and then sustain the businesses with footfall		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 positively prepared, justified and effective. The Council considers that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan's requirements and, where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. In relation to tall buildings, based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights, due to its location in proximity to a low rise context and in an area with limited accessibility to public transport, the site is not considered an appropriate location to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025). In relation to your comment on airport constraints, London City Airport safeguarding limit depicts a threshold for airport safeguarding analysis, and it doesn’t necessarily reflect the most appropriate height for a site. Therefore, the Council considers that referencing height limit thresholds for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-172	Populo Living		Reg19-E-172/005	Neighbou rhoods	N1 North Woolwic h	N1.SA2 Rymill Street													The draft site layout also suggests a green open space cutting the site in two, creating a north-south link to the DLR station through a ‘pocket park’ that should also ‘prioritise community growing opportunities’. This appears to ignore the substantial difference in levels between Rymill Street and the DLR station, which would make it difficult to achieve all these objectives.		A change to this policy approach has not been made. We did not consider a change to be necessary as the need for green space is justified in Newham’s Green and Water Infrastructure Strategy, which has identified a need for the allocation, N1.SA2 Rymill Street, to deliver a linear pocket park to service nearby residential neighbourhoods. The green space provision should prioritise community growing opportunities. This will be of benefit to residents on the site allocation and the wider neighbourhood. The infrastructure requirements and design principles for each allocation set out requirements on green space and connectivity that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The key routes shown in the map reflect the Local Plan’s desire to provide a new north-to-south link through the linear pocket park to enable accessibility to and from the King George V DLR step access at the ground level. The detail design and layout of the site will be subject to further masterplanning. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-172	Populo Living		Reg19-E-172/006	Neighbou rhoods	N1 North Woolwic h	N1.SA2 Rymill Street													Populo has discussed the site layout with the TFL DLR team and we consider there is an opportunity to better integrate the station with the Local Centre in line with the aspirations of the Plan, however it will require substantial investment, further supporting greater height on the site.		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 positively prepared, justified and effective. Whilst we acknowledge that pre-application discussions have been held with the TFL DLR team and LBN officers, the discussions are informed by 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. Based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights, due to its location in proximity to a low rise context and in an area with limited accessibility to public transport, the site is not considered an appropriate location to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/010	Neighbou rhoods	N1 North Woolwic h			N1.10			Blank	Blan k						Blank	N1: North Woolwich We acknowledge the inclusion of Thames Refinery Wharf in part 10 of this policy to safeguard its capacity and operation; however, we would also highlight the importance of mitigating noise impacts (as has been set out at part 19 for the airport).		Comment noted. 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. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/047	Neighbours	N1 North Woolwich														Text supporting an Elizabeth line station should be added under the North Woolwich vision. Although not identified as needed by LBN, if it were to progress this would have a substantial positive impact on the North Woolwich area, and should be acknowledged as a potential outcome.	Revise to read as follows: “The vision for North Woolwich will be achieved by: ... 20. supporting a privately funded Elizabeth Line station to improve access to the area and encourage sustainable surface access to London City Airport for staff and passengers. However, an Elizabeth Line station in the area is not a prerequisite to deliver housing growth in the Royal Docks.	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. Furthermore, TfL do not believe that the station is possible. The Council has therefore not included it in the North Woolwich vision.
Reg19-E-200	London City Airport		Reg19-E-200/050	Neighbourhoods	N1 North Woolwich			Up to 50											Given proximity of this allocation to the airport, all buildings above 6m AGL should be subject to an OLS / ILS analysis and may need to be subject to an independent IFP assessment.	All buildings or structures in this precinct above 6m AGL height should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [20. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/005	Neighbourhoods	N1 North Woolwich			6			Blank	Blank						Blank	[Neighbourhoods and Site Allocations N3 Royal Victoria TLS would like to pull out an important point perhaps missed in our previous representation “The vision for Royal Victoria will be achieved by.... 10. managing the transition between industrial and non-industrial uses through careful master planning, design and the delivery of modern industrial premises;” Point 10 seems to be at least missing some text.]	[TLS would suggest it read as follows: “10. managing the transition between industrial and non-industrial uses through careful master planning, design and the delivery of both new residential developments and modern industrial premises;” This reflects the fact that a greater quantity of new residential led developments is expected in the area and there is pre-existing longstanding significant industry, including within SIL.] It would also be preferable to add the same text for the Royal Victoria vision as contained in the point 6 of the North Woolwich vision (p362) “The vision for ~~North Woolwich~~ Royal Victoria will be achieved by....appropriate mitigation and buffering between residential and industrial uses.”	Comment noted. The Council recognises the importance of ensuring the Plan is clear and effective and therefore proposes to support the following modification, which will be presented to the Inspector for their consideration: Policy N2: The vision for Royal Victoria will be achieved by....appropriate mitigation and buffering between residential and industrial uses. Policy N4: The vision for Canning Town will be achieved by....appropriate mitigation and buffering between residential and industrial uses. Policy N11: The vision for Beckton will be achieved by....appropriate mitigation and buffering between residential and industrial uses. The Council has applied this approach to all neighbourhoods that have site allocations with industrial buffering.
Reg19-E-244	One Newham		Reg19-E-244/001	Neighbourhoods	N1 North Woolwich														These notes mainly relate to the North Woolwich Neighbourhood but the underlying points related more widely to policies and plans across Newham and how they are evidenced and ultimately delivered - having aspirations that are unlikely (even if possible) is not good strategic planning and gives rise to the potential for non-holistic impact analysis and decision making. There are also numerous examples where the reality on the ground is not accurately reflected in some of the maps and data sets that have been used as the foundation for devising the new policies and delivery approaches. The justification to spit out Albert Island from the North Woolwich area does not seem to be well evidenced especially given that this area is industrial (so has no impact on / input to the proposed Local Centre at Royal Albert Wharf but does included some housing provision that will remain in the the North Woolwich area - this runs the risk of diverting the benefits arising from this area away from North Woolwich and serves to further isolate the South East quadrant of the Royal Docks area which is already excluded from most of the Enterprise Zone and Opportunity Area activities.		Comment noted. Albert Island has remained in N4 Royal Albert North in both the Regulation 18 and Regulation 19 Local Plan. The neighbourhood boundaries have been informed by the Newham Characterisation Study 2024.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/002	Neighbourhoods	N1 North Woolwich														Why doesn't the Albert Island Enterprise Zone area have a site allocation (even given that it is a GLA led redevelopment) it still contributes to the wider area in terms of benefits and impacts - not least with respect to timing of the delivery and disturbance during the delivery phase that will add to the severance faced by North Woolwich?		A change to this policy approach has not been made. We did not consider this change to be necessary as the site did not meet the site allocation criteria set out in the Site Allocation and Housing Trajectory Methodology Note. This is because it was considered the same outcomes can be achieved through the implementation of the permission and the application of the employment and neighbourhood policies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/003	Neighbourhoods	N1 North Woolwich														What action is being taken to improve PTAL ratings in this area and to provide enhanced connectivity to West Silvertown (re-establishing a link that was severed with the arrival of the Elizabeth Line) especially given the amount of new facilities being delivered in the West Silvertown area? Only having one bus route serving the Eastern end of the area which is often impacted by local area traffic problems does not encourage modal shift.		Comment noted. The Sustainable Transport Strategy considers improvements to public transport (including bus routes) in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg19-E-244	One Newham		Reg19-E-244/004	Neighbourhoods	N1 North Woolwich														Several statements are made about the lack of access to the river frontage are inaccurate - there is a riverside path that runs West from the Royal Victoria Gardens park for ~ 360m but the route is fragmented, a low quality environment and can feel unsafe plus it ends abruptly at the boundary of the Silvertown Industrial area. Further, there is also a pathway that runs East from RVG park with good access as far as the King George V Lock which also continues to Royal Albert Wharf although the latter stage is less accessible, lower quality and less safe.		Comment noted. The neighbourhood profile summarises the connectivity along the Thames waterfront. The Neighbourhood policies (specifically points 14 and 15) set out what improvements are desired in terms of access to the river Thames.
Reg19-E-244	One Newham		Reg19-E-244/005	Neighbourhoods	N1 North Woolwich														The plan also states there is one Bus Garage in the area where in fact there are two [and the presence of strategic waste processing facilities (that are key sites designated as part of the East London Waste Management Plan) are completely omitted but should be included - even though they are not "good" neighbours.] The former North Woolwich Station building is actually owned by a Church Group and operates as such (in some fashion) but the references in the document don't acknowledge this - but whether this use continues as a consequence on the owners failing to secure planning permission remains to be seen.		Comment noted. The new bus garage on Thames Road is replacing the existing one.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/006	Neighbourhoods	N1 North Woolwich														[The plan also states there is one Bus Garage in the area where in fact there are two] and the presence of strategic waste processing facilities (that are key sites designated as part of the East London Waste Management Plan) are completely omitted but should be included - even though they are not “good” neighbours.		A change to this policy approach has not been made. We did not consider this change to be necessary as the need to safeguard waste management sites is set out through Policy W1. Our approach to safeguarding waste management sites is justified and in conformity with the requirements of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/007	Neighbourhoods	N1 North Woolwich														The NW Neighbourhood in particular is fragmented and massively constrained by physical geography and infrastructure which limits travel routes and potential for added value whilst also having limited retail provisions (of which some are of lesser quality) thus forcing increased levels of out-of-area spend - hard to trigger behavioural change but also some questions as to the quality of the base data (specifically relating to misclassification in the Priority Places for Food Index mapping).		Comment noted. 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. The mapping utilises national data, as pulled together and analysed by CDRC in partnership with the University of Leeds and company 'Which?'. Data can be accessed from: Priority Places for Food Index CDRC Data (note it requires creation of a free account). Note also that there is now a 2024 published dataset. Any questions about the data and methodology should be directed to CDRC, via data@cdrc.ac.uk.
Reg19-E-244	One Newham		Reg19-E-244/008	Neighbourhoods	N1 North Woolwich														Given the physical landscape constraints, how are new, safe, green routes going to be provided - where will these be and what will be lost to facilitate their introduction?		A change to this policy approach has not been made. We did not consider this change to be necessary as the need to improved 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 a key part of the N1 North Woolwich neighbourhood vision. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/009	Neighbourhoods	N1 North Woolwich														Why is no mention made of restoring and increasing access to the Dock edge at King George V Dock (subject to obvious constraints regarding Airport security needs) especially as CADP permission refers to the provision of a pathway and pocket park - why are these not explicitly included in the document?		The Council’s objective for this policy approach is to provide neighbourhood specific policies and site allocations for the N1 North Woolwich neighbourhood. However, the Council recognises the importance of ensuring the Plan is positively and therefore has therefore drafted the following modification, which will be presented to the Inspector for their consideration: N1: North Woolwich 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 and, where appropriate, supporting activation for water-related or water-dependant facilities.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/010	Neighbourhoods	N1 North Woolwich														NW Vision 6 - the concept of buffering is fine if it can and is done - evidence to date shows it rarely happens due to lack of land space in a congested and constrained area - how are you going to achieve this in reality?		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addressed the industrial buffering requirement through Design policy, Neighbourhood policy N1, and design principles in Site Allocations in North Woolwich. Applicants has to go through masterplanning in the planning application stage to ensure these requirements are met. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/011	Neighbourhoods	N1 North Woolwich														NWV 8 - what impact with industrial intensification have and how will these be mitigated in terms of noise, traffic and pollution and overloading of location facilities, especially in relation to public transport and retail?		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addressed the industrial buffering requirement through Design policy, Neighbourhood policy N1, and design principles in Site Allocations in North Woolwich. Applicants has to go through masterplanning in the planning application stage to ensure these requirements are met. Regarding overloading of facilities, the Local Plan allow provision of town centre uses in North Woolwich Local Centre and its extension at Site Allocation N1.SA2 which will potentially increase retail offer to meet local need. Various transport improvements as evidenced by the Sustainable Transport Strategy are included in the Neighbourhood policy and site allocation requirements in the Local Plan. Any future developments have to assess transport impact during the planning application stage to ensure no adverse traffic impact will be generated. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/012	Neighbourhoods	N1 North Woolwich														NWV 10 - How will this be achieved and will the promotion of outward flows of items be done? What will be done to promote lower / no carbon water based freight transport using the rivers and Docks?		Comment noted. The wharf at Thames Refinery Wharf is protected by safeguarding directions from the Secretary of State. Local Plan Policy T4 encourages the use of waterways for deliveries and servicing, as well as ensuring that deliveries and servicing journeys use zero emission or cargo bikes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/013	Neighbourhoods	N1 North Woolwich														NWV 11 - How will new businesses be attracted to the area to make use of the increased availability of work and retail space whilst ensuring that the products and services are actually affordable - affordable housing surrounded by unaffordable retail and service providers means that the housing isn't affordable? The shape of North Woolwich means that the Local Centre is at the limit of a 15 minute walking distance from the Eastern part of the area.		A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses the need for space for local businesses through a range of policies in the Plan, including through policy HS2 that requires the provision of small affordable rent units in larger developments and by supports temporary activation of empty high street units. Further provision of floorspace for businesses is also supported through policy J1. 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. The NPPF requires the Plan to identify sites to support delivery of retail needs in the borough, and that these should be directed in line with the sequential test, prioritising town centre designations. The NPPF also requires that site allocations must be available and deliverable. The N1.SA2 Rymill Street site is the only one in North Woolwich that meets these tests to support planned growth in North Woolwich and address existing weaknesses in provision. The allocation includes a requirement for a new food store, recognising local need for further access. Further, 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 is satisfied that the plan is sound.
Reg19-E-244	One Newham		Reg19-E-244/014	Neighbourhoods	N1 North Woolwich														NWV 11 - is there actually a demand for additional food store provision literally next door to the existing food shop? Likely to fail to meet a viability threshold especially given that Rymill Street isn't a natural walking route from other areas of North Woolwich and there are already some empty units in the existing shopping area.		The policy approach for North Woolwich Local Centre extension responds to the objective of addressing food insecurity in the borough by tackling 'food deserts', in line with corporate strategies set out in 50 Steps to a Healthier Newham (Priority 6: Creating a healthier food environment) and the Young People and Food Security Strategy (2021).
Reg19-E-244	One Newham		Reg19-E-244/015	Neighbourhoods	N1 North Woolwich														NWV 14a - How can a new bridge between Thames Road and Hartman Road be built given the existing buildings (and it is outside the NW area) and what is the demand for such a route? The Factory Road to Albert Road connection has more value but again is location constrained as most of Factory Road only has a single footpath on the Southern side and for accessible ramps would need significant space to gain the height and the same issue exists on Albert Road.		Comment noted. LB Newham considers that a future connection between Thames Road and Hartmann Road is along a key desire line.
Reg19-E-244	One Newham		Reg19-E-244/016	Neighbourhoods	N1 North Woolwich														NWV 14b - Need to open access to Hartman Road East (between LCY and Galleons Point) to provide alternative access to KGV DLR Station and towards West Silvertown.		Comment noted. The section of Hartmann Road between London City Airport and Gallions Point is not under the ownership of the London Borough of Newham. LB Newham understands that future opening of Hartmann Road is part of the London City Airport CADP permission.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/017	Neighbourhoods	N1 North Woolwich														NWV 14b - Need to improve Public Transport in the whole area (not just focused on RVG Park!) as the Eastern end of the area only has 1 bus route and no longer serves West Silvertown directly. (Note - older N Woolwich residents are particularly upset about this & that they need to take a minimum of 2 buses to reach a supermarket)		Comment noted. The Sustainable Transport Strategy considers improvements to public transport (including bus routes) in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg19-E-244	One Newham		Reg19-E-244/018	Neighbourhoods	N1 North Woolwich														NWV 15 - What does improved access actually mean? How does this link to the Thames Estuary 2100 flood defence plans for increased height levels?		Comment noted. The Newham Green and Water Infrastructure Strategy states that connectivity along the Thames waterfront is intermittent with no access to the west of Royal Victoria Gardens and intermittent connectivity between the park and Gallions Reach. It goes onto identify the site allocations that should provide better access to the water at Royal Victoria Gardens and connectivity to the walkway along the Thames.
Reg19-E-244	One Newham		Reg19-E-244/019	Neighbourhoods	N1 North Woolwich														NWV 15 - The Thames Path already goes to Gallions Reach along the riverside and is aligned with the Capital Ring but the current poor state of the path across Albert Island raises issues around security but in fact that gaps are not in the NW neighbourhood.		Comment noted.
Reg19-E-244	One Newham		Reg19-E-244/020	Neighbourhoods	N1 North Woolwich														NWV 18 - The issues with air quality in part are caused by the Woolwich Ferry and the idling cars that are waiting (this problem has been worse during Silvertown Tunnel prep works and probably will continue and get worse when the tolling comes in on both tunnels), Need to ensure that traffic regulations (speed / engine off waiting / etc.) are properly enforced as residents are being disrupted by impact on bus routes.		Comment noted. The Newham Air Quality Action Plan sets out anti-idling campaigns to help address this issue across the borough as this is not something the Local plan can enforce.
Reg19-E-244	One Newham		Reg19-E-244/021	Neighbourhoods	N1 North Woolwich														NWV 19 - What does this actually mean for existing businesses and residents and isn't this a long-term failure of planning policy by bringing significant quantities of new residents in to an already industrial area with industries in many areas of the Southern part of the Royal Docks area, not just the Airport?!		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers that we have adopted an appropriate balance between housing supply and protecting existing industrial uses. The Local Plan addressed the industrial buffering requirement through Design policy, Neighbourhood policy N1, and design principles in Site Allocations in North Woolwich. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/021a	Neighbourhoods	N1 North Woolwich														[NW19] The Royal Docks Team and ExCel both deliberately focus on international markets so air travel is a key enabler so why not support and incentivise the move to newer, less noisy and polluting aircraft especially as the levels are already well below the compliance thresholds?		Comment noted. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/022	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA1 - North Woolwich Station is seemingly only a Community Facility in name not action and is unclear what the future holds given that the planning application was rejected and the appeal was also turned down - situation made worse by the owner undertaking unauthorised works which haven't been reversed.		Comment noted. The former North Woolwich Station is included in the site allocation boundary for comprehensive development. The site allocation requires future development to deliver the priority land uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan's evidence base. Any future developments coming forward is required to contribute to the restoration of the former North Woolwich station and return to its viable use in the masterplanning process as outlined in the development principle of N1.SA1 site allocation. For existing uses our enforcement team may be able to help: https://www.newham.gov.uk/planningdevelopment-conservation/planningenforcement The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/023	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA1 DP - Green fringe to North of station sidings redevelopment plot isn't currently accessible and so is not an amenity and is of poor quality but early (meanwhile) use would be beneficial.		Comment noted.
Reg19-E-244	One Newham		Reg19-E-244/024	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA1 DP - How is improved connectivity to the North going to be delivered through what appears to be privately owned sites or is this in reality a limited improvement by using the old track-bed to the North East corner of the wider site area which is a busy and hazardous road junction?		We acknowledge that the northern part of the site is abutting a former rail track which sits within TFL ownership. However, the design 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. The north-south key route reflects the Plan's desire to ensure that any proposed residential development on the N1.SA1 North Woolwich Gateway site allocation will have an easy accessibility to the Woolwich Pedestrian Tunnel and Pier Road. The detail design and layout of the future development will be subject to case-by-case assessment during the development management process.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/025	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA1 DP - There is already a East - West route along the river although poorly maintained and unwelcoming and almost no potential for enhancement (and increased flood defence measures may further limit use / enhancement. Also, the Westward direction is a dead-end at the industrial area - need a better plan for connectivity along Factory Road which is limited by the fact that it is intensively used by HGVs. Buses and speeding vehicles.		A change to this policy approach has not been made. We did not consider this change to be necessary as the design 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. We acknowledge that the western part of the site is abutting an industrial site which can limit the extension of the Thames Path into Newham. However, in recent years, sections of paths along the Royal Docks Corridor 'Canning Town to Woolwich Crossing' have already been redeveloped and upgraded. The east-west key route reflects the long term aspiration of improving the existing Capital Ring in Newham and the east-west cycle connection. Development on the N1.SA1 North Woolwich site allocation is expected to address the Local Plan objective and the sustainable strategy aspiration. More details on the priority cycling corridors and the active travel aspiration 1A to improve the borough-wide cycle network and the active travel action 4A to provide better integration with the Capital Ring could be found in the Newham Sustainable Transport Strategy 2024. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/026	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA1 DP - given that planning approval for this site has already been granted why are so many of these elements aspirational even allowing for the funding constraints that might delay the delivery?		Comment noted. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/027	Neighbourhoods	N1 North Woolwich	N1.SA1 North Woolwich Gateway													N1.SA2 DP - why create a new Local Centre immediately adjacent to the existing one but on the Northern side which doesn't improve access in a meaningful way for much of the existing population, especially those in or coming to developments in and around SA1?		A change to this policy approach has not been made. We did not consider this change to be necessary as the NPPF requires the Plan to identify sites to support delivery of retail needs in the borough, and that these should be directed in line with the sequential test, prioritising town centre designations, and that sites allocations must be available and deliverable. The N1.SA2 Rymill Street site is the only one in North Woolwich that meets these tests. This site is suitable for delivering the uses as outlined in the development principles including a new food store recognising local need for further access and for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan's evidence base. Site allocation N1.SA1 North Woolwich Gateway is not justifiable to create a new designation as it sits wholly within the 400m radius of North Woolwich Local Centre, and is therefore not in an area of gap. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-244	One Newham		Reg19-E-244/028	Neighbourhoods	N1 North Woolwich	N1.SA2 Rymill Street													N1.SA2 DP - key routes on the map are misleading and don't account for the fact that direct access along Pier Road to the station is the desire path unless the proposal is to close off the Eastern access (which is where the only lifts are..... when they work!).		The design 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. The key routes shown in the map reflect the Plan's desire to provide new development on the site allocation with a new direct access point from the King George V DLR step access. The existing western accessible entrance to the King George V DLR falls outside the N1.SA2 Rymill Street site allocation boundary line and no change is proposed. Therefore, the direct link from Pier Road and the accessible access to the DLR station will remain.
Reg19-E-244	One Newham		Reg19-E-244/029	Neighbourhoods	N1 North Woolwich	N1.SA2 Rymill Street													N1.SA2 DP - In the text it refers to "main town centre" uses but is actually an extension to the existing local centre (anything else would not be policy compliant).		Comment noted. The site allocation N1.SA2 Rymill Street provides a local centre extension, and that main town centre uses will be supported on this site at ground level. Nevertheless, the Plan applies in the round, and Local Plan policy HS2 of the Local Plan would allow for diversification to other uses in a centre where there is an identified local need, including to social infrastructure uses that are not already also a main town centre use.
Reg19-E-200	London City Airport		Reg19-E-200/034-b	Design	N1 North Woolwich			Table 1 Tall Building Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N1 Area: North Woolwich Height Limit: Up to 50m Comment: Given proximity of this allocation to the airport, all buildings above 6m AGL should be subject to an OLS/ILS analysis and may need to be subject to an independent IFP assessment. Proposed Mitigation: All building structures in this precinct above 6m AGL height should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	The Council's objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport's Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add 'subject to airport constraints' to TBZ7: King George V/Pier Parade, TBZ8: Store Road / Pier Road and TBZ22: Thameside East] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/108	Neighbourhoods	N10 Plaistow	N10.SA2 Newham 6th Form College													[Newham General Hospital bus stands east of N10.SA2 will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		Comment noted.
Reg19-E-014	CPRE		Reg19-E-014/017	Neighbourhoods	N10 Plaistow	N10.SA2 Newham 6th Form College													[8. Specific site allocation comments] • N10.SA2 – Newham Sixth Form college site. This is allocated for “Residential development and open space” We do not believe this site should be allocated for housing. The green/open space should be retained for its amenity value.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-014	CPRE		Reg19-E-014/018	Neighbourhoods	N10 Plaistow	N10.SA3 Newham Leisure Centre													[8. Specific site allocation comments] • N10.SA3 – Newham Leisure Centre site. This allocation is still unclear about how much space will be retained as green space and more generally it is a proposal to build residential on green space which we strongly object to. This should not be allocated for residential development – if the leisure centre is to be reprovisioned, no green or open space should be lost and car parking should all be returned to green space, with only disabled parking retained, to support sustainable transport targets.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/037	Neighbourhoods	N10 Plaistow	N10.SA1 Balaam Leisure Centre					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/038	Neighbourhoods	N10 Plaistow	N10.SA1 Balaam Leisure Centre					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/039	Neighbou rhoods	N10 Plaistow	N10.SA2 Newham 6th Form College					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/040	Neighbou rhoods	N10 Plaistow	N10.SA2 Newham 6th Form College					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/041	Neighbou rhoods	N10 Plaistow	N10.SA3 Newham Leisure Centre					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/042	Neighbou rhoods	N10 Plaistow	N10.SA3 Newham Leisure Centre					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/043	Neighbou rhoods	N10 Plaistow	N10.SA4 Balaam Street Health Complex					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/044	Neighbou rhoods	N10 Plaistow	N10.SA4 Balaam Street Health Complex					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/003	Neighbou rhoods	N10 Plaistow	N10.SA2 Newham 6th Form College													Newham Sixth Form College (NewVlc) is one of the largest Sixth Form Colleges in London, with some 2,400 full time students and more than 250 staff. The College focuses on the development of skilled learners and progression to higher education. 2.2 The College was established in 1992 with the aim of increasing opportunities for school leavers in Newham and neighbouring boroughs who opt to stay in education. It specialises in working with young people aged 16-19 progressing from year 11 at school. 2.3 The College has grown and developed over the past 25 years and offers a wide range of courses including A-levels, specialist pathways, levels 2 and 3 vocational programmes, foundation level and ESOL programmes. The aim is to encourage students to become skilled and successful learners and to progress to higher education, employment or training. 2.4 Some 70% of NewVlc’s students come from Newham and the College is a key provider in raising education and training levels within the Borough; in turn, improving social and economic mobility for one of the most deprived boroughs in London. 2.5 In spring 2024 NewVlc’s Ofsted rating was downgraded from ‘good’ to ‘inadequate’ and the College is currently in Supervised College Status. In November 2024 NewVlc will merge with Newham College and the new senior leadership team will put in place a strategy for addressing the inadequacies identified by Ofsted.		Comment noted.

Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/005	Neighbourhoods	N10 Plaistow	N10.SA2 Newham 6th Form College													2.6 NewVlc’s estate has its origins in Plaistow Grammar School which was established on the site in 1928. The single storey building, known as A Block, which fronts onto Prince Regent Lane forms a large part of the footprint of the current College. [Figure 1: Aerial view of NewVlc (Google Earth)] 2.7 A range of other buildings form the campus ranging in age and condition. The most recent one being a new building on Prince Regent Lane extending to 2,400 sq m which was completed in 2017 and provides a new entrance, learning resource centre and student support services. [Figure 2: New entrance building completed in 2017] 2.8 Other buildings at the campus, however, are not so modern and overall, the College’s buildings are inefficient in the use of the land and increasingly showing both condition and functional suitability issues. 2.9 Historically, NewVlc explored a number of estate options, including relocating to a completely new site and a phased masterplan which would seek to address the quality and functional suitability of the buildings and layout of the campus by disposing of part of the site for residential development to cross fund the improvements. 2.10 However, neither of these options are currently appropriate or viable and the immediate focus is for the estate to provide continuity of education provision for current students following the merger with Newham College. 2.11 Any future rationalisation of NewVlc’s campus will be underpinned by a campus wide estate strategy. It is acknowledged that the Prince Regent Lane campus has suffered from under investment – apart from the new frontage block – and there is a need to renew a number of the buildings. This will only be possible if Government funding becomes available and/or through disposal of surplus land, which may include some or all of the southern part of the campus. All receipts will be reinvested in improving the quality and functional suitability of buildings at NewVlc. 2.12 Newham College London has campuses in East Ham (High Street), Stratford (Welfare Road) and the London City Institute of Technology in the Royal Docks which is run with Queen Mary University of London. 2.13 NewVlc and Newham have highly complementary curriculum offers. The combined college will offer a comprehensive post-16 offer, spanning SEND and foundation learning; A Levels, T levels and vocational qualifications. Currently the two colleges educate 4,600 16-18 year old students (plus some 8,000 adult learners). 2.14 There is relatively little curriculum overlap between the two colleges, and where there is duplication, this either reflects growing and sustainable demand; government educational policy; or alignment to the skills agenda defined through the Local Skills Improvement Plan led by BusinessLDN, and endorsed by each of the sub-regional partnerships	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			across the capital. 2.15 Newham College operates at capacity with each of the campuses (East Ham and Stratford) developed to its site boundaries. The College has an approved estates strategy which aims, initially, to deal with acute shortage of teaching space at its East Ham Campus in phase 1, with subsequent phases focused on optimising utilisation, student experience and facilities through a coherent masterplan 2.16 Recent upgrades have also taken place the Stratford Campus utilising money from the Further Education Capital Transformation Fund. There will be a need for further improvements and rationalisation at both the East Ham and Stratford campuses as buildings age and in response to curriculum requirements 2.17 In order to achieve this, the merged College needs an appropriate planning policy framework against which rationalisation and modernisation can be promoted		
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/031	Neighbou rhoods	N10 Plaistow	N10.SA2 Newham 6th Form College													Site Allocation N10.SA2 Newham Sixth Form College allocates the southern half of NewVic’scampus for residential development, reflecting NewVic’s long term Masterplan for the site which included disposal of surplus land for residential development in order to fund consolidation of the College on to the northern part of the campus in new fit for purpose education buildings. 6.2 However, NewVic’s Masterplan is under review following its merger with Newham College along with the estate of the combined Colleges in order to ascertain how education provision and space need can be appropriately met. A large scale disposal of land is unlikely to be the best way forward at NewVic due to viability. 6.3 A more incremental approach, which focuses on retention, maintenance and remodelling is likely to be brought forward. This may include some disposal element, but not of the scale previously envisaged. 6.4 The site is therefore unlikely to yield the scale or quantum of residential development anticipated in N10 SA2.	6.5 Notwithstanding this, in order to future proof the campus, we recommend that the site allocation remains as it will provide flexibility with NewVic’s estate review and enable the College to respond to curriculum and funding requirements as part of the wider Newham College entity.	Comment noted. We acknowledge your evolving plans for the NewVic campus and understand the emerging estate strategy is yet to be updated. We considered a change to the site allocation is not necessary at this point of time as the site allocation reflects the vision of the site and identified as suitable for delivering the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base. This document sets out which site allocations were considered suitable for residential and open space, and the evidence base documents that were used to inform these decisions. The development principles for each allocation set out requirements that need to be met on site. The scale and quantum of the future development will be subject to case-by-case assessment during the development management process. The council is satisfied that the plan remains sound without changes.
Reg19-E-013	Transport for London		Reg19-E-013/109	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre													[East Beckton bus station to the south-east of N11.SA1 will need to be protected.] We note that no change has been made to the site infrastructure requirements. Although we note that Policy T1 now explicitly mentions bus stands, the reference is to the bus station which needs to be protected and may be considered for expansion to cater for growth in this area.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/110	Neighbours	N11 Beckton														[Although there are no current proposals, we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/111	Neighbourhoods	N11 Beckton	N11.SA2 Cyprus													We welcome inclusion of the following in the site infrastructure requirements: ‘Development should assess the capacity of Cyprus DLR Station and provide mitigation on potential impact on transport capacity.’		Support noted.
Reg19-E-014	CPRE		Reg19-E-014/019	Neighbourhoods	N11 Beckton	N11.SA2 Cyprus													[8. Specific site allocation comments] • N11.SA2 - vacant land and greenspace at Ferndale Street, E6 6FS. It is difficult to see how ‘no loss of green space’ can be achieved with this site, if it is to be used for residential development. More generally, given the lack of green space in the borough, it should be retained for public green space.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/028	Neighbourhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	No						Blank	[Alpine Way] Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	Make reference to specific infrastructure issues identified in attached table in site allocations.	The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N11.SA3 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/029	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	No						Blank	[Alpine Way] Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/045	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/046	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Blank	No						Blank	[Waste Response] The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/047	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/048	Neighbou rhoods	N11 Beckton	N11.SA2 Cyprus					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/049	Neighbou rhoods	N11 Beckton	N11.SA2 Cyprus					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/140	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	No			No			Blank	The site allocation N11.SA3 is located within 800m of Beckton Sewage Treatment Works (STW) and therefore may be impacted by odour. The site is therefore subject to similar requirements as per our response to Allocation N17: Gallions Reach N17.SA1. The site should be subject to similar requirements from the current Local Plan Inspector’s Report of November 2018 in relation to Site N17.SAI which “are necessary for the effectiveness of the Plan” and state at paragraph 134 that: “Some concerns were raised over the proximity of an expanding STW to the development of nearby residential uses within the proposed Beckton Riverside Development. In response, MM28 introduces a change in the implementation section of policy INF4, which ensures that new development proposals in the vicinity of Beckton STW should undertake 1. Odour Impact Assessment, plus 2. necessary mitigation; 3. clarifies who is responsible for mitigation work; and 4. ensures that the living conditions of future inhabitants in the Riverside area will not be adversely affected by reason of odour. These are necessary for the effectiveness of the Plan. Policy INF4 also provides for sufficient capacity to meet the needs of development of utilities infrastructure over the appropriate time horizon.”	Amend policy in light of odour comments above.	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 and has therefore made the following wording change: 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. Any necessary mitigation should be completed ahead of the occupation of developments in the vicinity. N11.12 and N17.14: mitigating the odour impacts of the sewage treatment works ahead of the occupation of developments in the vicinity through appropriate buffering and other design solution; N11.SA3 and N17.SA1 Phasing and Implementation: 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. which is included in the modification table.
Reg19-E-172	Populo Living		Reg19-E-172/011	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre											No		Whilst we largely agree with the ambitions set out in the Plan description (less dominated by parking, a town centre setting, improved social infrastructure), the requirements and limitations set out do not reflect the financial implications of achieving this. Most notably, a new leisure centre and reorganising the supermarket store and parking to unlock development is expensive and will make this challenging to deliver. The overall description of development will be unviable to deliver in the context of the wider Plan requirements, most notably the limited heights despite being immediately adjacent to a DLR and major bus station. Therefore, it will be unviable to deliver this site allocation without an increase in height and scale of development.	We would suggest a much higher upper-limit to the tall building zones of 75m, with much wider areas covered. The current height allocations are contrary to the London Plan Policy D1 that states “As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive” and that “the density of development proposals should be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services”. Height would also appear to be more suitable to the south of the site to avoid overshadowing existing residential to the north.	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 positively prepared, justified and effective. The Council considers that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan's requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. In relation to tall buildings, based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights, due to its location in proximity to a low rise context and outside an Opportunity Area, the site is not considered an appropriate location to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-172	Populo Living		Reg19-E-172/015	Neighbou rhoods	N11 Beckton	N11.SA2 Cyprus													Detailed proposals for this site were approved by Newham’s Dec-23 Strategic Development Committee Dec-23 (Application Number: 23/00840/FUL). The proposed layout in the LP does not match the approved design for the site, so it is suggested that the LP entry is either updated to match the above proposals or removed from the LP.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/002	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way						Blank	Blan k					Blank	Background <u>Site Location</u> Beckton Retail Park is located in the south-east of Newham Borough, to the south of Alpine way, east of Woolwich Manor Way and north of Windsor Terrace. [site location map provided] <u>Current Allocation</u> Newham adopted the current Local Plan in 2018, which contained allocation S02 ‘Alpine Way’. This allocation proposes a mixed-use neighbourhood, consolidating the neighbourhood centred on Winsor Terrace and incorporating employment uses along Alpine Way to complement the Strategic Industrial Location (SIL) to the north and east. The predominantly residential area in the southern portion of the site will have dedicated access, with improved links to East Beckton town centre and the surrounding residential areas to the east and west. Indicative building heights range from 6 to 8 storeys. The following designations are also relevant to the redevelopment of the retail park: - E01/J01: Employment Hub allocation, covering the northern third of the site and the wider area to the north, west and south-east of the retail park. - GS246: Small open amenity space with SINC designation along the western boundary of the site. - GS257: Landscape buffer with SINC designation on the southern boundary of the site. <u>Draft Proposals</u> The site was the subject of detailed discussions with London Borough of Newham in 2018 and early part of 2019 regarding a mixed-use development for commercial, employment and residential uses. Whilst the scheme design was not fully developed, the principles of the scheme were supported by Newham and the GLA. This support came partly from the site allocation S02 for the site for mixed use development as set out in the 2018 Local Plan which is referenced above. Due to the economic conditions at the time, a number of long dated occupational leases and then Covid, the scheme was not progressed any further. A subsequent pre-application meeting was held with LB Newham on 2nd August 2024 with an updated proposal in response to the proposed re-insertion of the Alpine Way site allocation and market conditions improving. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the western and southern areas of the site in 2026 and the entire site in 2028. The scheme prepared by Rolfe Judd Architecture (RJA) allows for the southern side of the site to be developed as Phase 1, and then the western side to be developed as Phase 2 and whilst this is occurring, the eastern side will remain trading as retail until lease expiry.	Comment noted.

																		This approach would allow for a phased delivery programme, with Phase 1 and 2 delivering approximately c.650 residential units over a 5 to 6 year build out programme. This would then allow for the implementation of the eastern Phase 3 and 4 delivering a further c.450 residential units and commercial/light industrial space. The response to these proposals was generally positive, with the principles of a mixed-use scheme being considered acceptable on the basis that they accounted for the site allocation and draft local plan. The overall massing and layout were also considered appropriate for the site but the approach to providing a buffer between the proposed residential to the south of the site and SIL to the north and east would need to be carefully considered as the designs progress. The outline proposals and feedback have been set in more detail below where relevant to the emerging policies in the Local Plan. <u>Removal of Site Allocation</u> The Regulation 18 draft local plan did not include a site allocation for Beckton Retail Park. On 25 January 2023, the Newham planning policy team confirmed that the site had been removed from the emerging local plan due to insufficient information regarding its availability, suitability, and deliverability. In our representations submitted on 20 February 2023, we promoted the re-insertion of the Alpine Way site allocation into the local plan, on the grounds that the site is wholly appropriate as a site allocation because it is: - Deliverable - Suitable - In line with the LB Newham Characterisation Study - Would support the SHMA in delivering new homes - Located adjacent to East Beckton District Centre - Within a Tall Building Zone As set out in the representation, LAMIT wished to: 1. Promote the re-insertion of a site allocation for mixed-use development on Beckton Retail Park on the basis that the site is available, suitable for development and deliverable. 2. Support ‘D4: TBZ4 Beckton Tall building zone’ and promote the extension of the 40m zone to include the south-western corner of Beckton Retail Park. 3. Support Draft Policy N11: Beckton and clarify the range of uses acceptable under a mixed-use redevelopment proposal.			
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/003	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blan k						Blank	Key Emerging Policies		Comment noted.
																			The following draft policies are relevant to the Alpine Way site:		
																			Policy N11 (Beckton) outlines a vision to transform the neighbourhood with a focus on enhancing connectivity, reducing car dependency, and improving green spaces. It encourages moderate increases in housing density		

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			while respecting local character, particularly in areas like Winsor Terrace. Key goals include reconfiguring the East Beckton District Centre for better retail and leisure services, improving walking and cycling routes, and expanding industrial use in certain areas. Additionally, it aims to create a safer, more walkable environment through better street layouts and enhanced public transport links, while addressing environmental concerns such as flood risks and air quality.		
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/004	Neighbourhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blank						Blank	[Key Emerging Policies The following draft policies are relevant to the Alpine Way site:] N11.SA3 (Alpine Way) designates the site for development including residential and employment uses, as well as the provision of new open space. The employment uses are expected to prioritize light industrial functions, warehouses, and storage facilities, aligning with Policy J1. The development must address flood risk, particularly from surface water, and ensure mitigation measures are in place. Building heights are planned to range between 3 to 13 storeys, with taller buildings positioned to create a gateway to the site. Additionally, the design should include green space, protect local heritage, and improve walking and cycling connectivity.		Comment noted.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/011	Neighbourhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Blank	Blank						Blank	[Key Emerging Policies The following draft policies are relevant to the Alpine Way site:] N11.SA1 (East Beckton Town Centre) is located directly to the south-west of the Alpine Way site. The site allocation outlines the reconfiguration and enhancement of the East Beckton District Centre to provide a mix of residential, retail, and social infrastructure, including a health center, community facilities, sports, and open spaces. The policy emphasizes maintaining retail spaces while introducing leisure and cultural activities to support a local evening and night-time economy.		Comment noted.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/012	Neighbourhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blank						Blank	Representations We would like to submit representations to the Regulation 19 Draft Submission Local Plan consultation in response to the following draft policies: 1. Support N11.SA3 Alpine Way, with proposals for updates and clarifications in the allocation based on the latest designs discussed with the council at pre-app.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/014	Neighbou rhoods	N11 Beckton						Blank	Blan k						Blank	[Representations We would like to submit representations to the Regulation 19 Draft Submission Local Plan consultation in response to the following draft policies:] 3. Support Draft Policy N11: Beckton and clarify the range of uses acceptable under a mixed-use redevelopment proposal.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/015	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blan k						Blank	N11.SA3 Alpine Way Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:		Support noted.

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

Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/017	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way						Blank	Blan k					Blank	[N11.SA3 Alpine Way Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:] <u>Strategic Industrial Location Buffer Zone</u> The draft allocation states that industrial and employment floorspace should be located in the northeast of the site to provide a buffer to the Strategic Industrial Location (SIL). Non-residential, stacked industrial buildings are considered the most appropriate typology for this buffer. The site’s design and layout should include public realm enhancements and avoid orienting habitable rooms and amenity spaces toward industrial uses. The most recent proposals suggest integrating residential areas with industrial zones using a hybrid scheme, similar to a previous example from 2018. In that project, a single strip of workspace was placed above a large ground-floor and mezzanine retail unit to serve as a buffer, allowing residential development in the remaining parts of the block. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units were designed in small clusters. These units could either function as industrial spaces or be converted back to residential use, depending on future needs. An alternative approach would involve replacing large retail units with townhouses or flats that back directly onto commercial B1 units. This would create a buffer where the commercial units face the industrial area, while the residential units face south toward the main site, forming a street and accommodating future residential phases. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units have been designed and built, with future residential units facing away with complete and successful separation of uses. This flexibility would allow for residential development adjacent to industrial zones while maintaining compatibility with the industrial environment. It also maximizes residential use in a corner of the site without compromising the adjacent SIL area. As the project progresses, the design will evolve to address safety and dual-aspect requirements. This aligns with the 'Agent of Change' principle set out by London Plan Policy D13, which aims to ensure that existing industrial operations are not disrupted by introducing new residential development. Overall, we recognize the need to protect future residents’ amenities while avoiding any compromise to the SIL’s function, but	[In summary, we support draft Policy N11.SA3, but request the following amendments:] 2. Allow for residential development within the buffer zone on the basis that London Plan Policy D13 Agent of Change is fully complied with.	A change to this policy approach has not been made. We did not consider this change to be necessary as our Characterisation Study concluded that vertical co-location would not be suitable for buffering frequent heavy vehicles and ‘dirty’ uses within Strategic Industrial Locations. Non-residential stacked industrial building is considered as the most appropriate typology at this site to provide a buffer, and provide employment capacity to meet the imminent industrial demand in the borough as evidenced by the Employment Land Review 2022. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			there are several potentially acceptable solutions for introducing residential units into the industrial buffer zone, while maintaining compliance with London Plan Policy D13. We request that the site allocation be updated to acknowledge that residential uses within this buffer zone can be considered acceptable, provided that compliance with Policy D13 is achieved.		
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/018	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blan k						Blank	[N11.SA3 Alpine Way Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:] <u>Building Heights</u> The draft allocation states that building heights should range between 9-21m (c.3-7 storeys) with taller buildings up to 32m (c.10 storeys) and 40m (c.13 storeys) to the west to add wayfinding and to mark the gateway to the site. Massing should step down towards the east-south of the site to sensitively integrate with the heritage assets. The response to draft Policy D4: TBZ4 Beckton Tall Building Zone addresses building height on the Alpine Way site allocation.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/019	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blan k						Blank	[N11.SA3 Alpine Way Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:] <u>Street Hierarchy</u> The draft allocation states that the design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy, enhancing walking and cycling links north to south to Beckton Alp and enhancing pedestrian connectivity to East Beckton Town Centre and residential uses across Woolwich Manor Road to its west and Winsor Terrace to its south. The layout should also future proof east/west routes knitting to the urban fabric to the east of the site. Development should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, framing a central public space. We recognize the importance of any future development on the Alpine Way site enhancing connectivity and reinforcing the existing street network. However, we are still in the early stages of developing a masterplan and have not yet determined the location of blocks within the site. Therefore, we request that the key on page 544 of the draft Local Plan be amended to read, 'Key site access points and indicative key routes'.	[In summary, we support draft Policy N11.SA3, but request the following amendments:] 3. The key on page 544 of the draft Local Plan be amended to read, 'Key site access points and indicative key routes'.	A change to this policy approach has not been made. The design 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. The site layout and connectivity should be delivered through comprehensive masterplanning and will be assessed through the development management process. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/020	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way					Blank	Blan k						Blank	[N11.SA3 Alpine Way Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:] <u>Development Delivery Timescale</u> The draft allocation states that scheme is likely to be delivered in the medium to long term. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the western and southern areas of the site in 2026 and the entire site in 2028. The current approach would allow for a phased delivery programme, with Phase 1 and 2 delivering approximately c.650 residential units over a 5 to 6 year build out programme. This would then allow for the implementation of the eastern Phase 3 and 4.		A change to this policy approach has not been made. We did not consider this change to be necessary as the phasing of the site allocations are determined based on a consistent method as outlined in the Site Allocation and Housing Trajectory Methodology Note where only sites with planning permission are phased in the short term. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/026	Neighbou rhoods	N11 Beckton			7			Blank	Blan k						Blank	N11 Beckton This policy sets out the neighbourhood profile and sets out a vision for Beckton. Part 7 of the policy supports the intensification of existing retail and leisure parks for industrial, logistics and distribution and related functions as part of mixed-use development.	We support the principle of introducing mixed-use development on existing retail parts, but request that this wording is adjusted to acknowledge that mixed-use development can include residential, retail and commercial elements, in addition to the industrial, logistics and distribution uses referenced by policy.	This wording change is not supported. We did not consider this change to be necessary as this neighbourhood vision reflected the opportunity identified in the Employment Land Review to provide additional industrial capacity at retail and leisure parks in view of the locational consideration to meet our borough's industrial needs. The opportunity for residential use at appropriate locations is recognised in the site allocations and any main town centre uses should apply town centre first principle according to the High Street Policy. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/028	Neighbou rhoods	N11 Beckton	N11.SA3 Alpine Way						Blank	Blan k						Blank	Conclusions		A change to this policy approach has not been made. We did not consider this change to be necessary as, based on the sieving exercise to identify tall building locations and maximum heights, due to low rise context and its sensitive location in proximity to heritage asset, this Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights and design principles seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of policy D3, 3.3.1 clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.” In line with policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. The tall buildings assessment fed into the site allocations capacity testing which provides the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. While we acknowledge that Newham is unable to meet its 2021 housing target within the period of the London Plan, this is due to delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target and not due to insufficient land supply or site optimisation. As a borough, 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 till 2033/34. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: H1.1: Newham will enable a net increase of between ~~51,425 and 53,784~~53,194 and 54,976 quality residential units between 2023 and 2038.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-247	Matt Ponting		Reg19-E-247/001a	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone] I don’t want the youth centre to go, [but I think that the car park should be gone and be more trees.]	Comment noted. The existing community facilities at the site will be protected through the requirements outlined in Local Plan Policy SI1. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in this policy.
Reg19-E-247	Matt Ponting		Reg19-E-247/001b	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone] [I don’t want the youth centre to go, but] I think that the car park should be gone and be more trees.	Comment noted. The site allocation will enable the consolidation of the existing car park to deliver the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base. The requirement for incorporating additional trees in a development is set out in Local Plan Policy GWS4.
Reg19-E-247	Matt Ponting		Reg19-E-247/002a	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I would like to keep everything to be the same [and would not like high buildings]	A change to this policy approach has not been made. We did not consider this change to be necessary as this site is suitable for delivering the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base. This document sets out which site allocations were considered suitable for residential, town centre uses, social infrastructure and open space, and the evidence base documents that were used to inform these decisions. The existing community facilities and sports and recreation facility at the site will be protected through the requirements outlined in Local Plan Policies SI1 and SI3. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in these policies. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-247	Matt Ponting		Reg19-E-247/002b	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I [would like to keep everything to be the same and] would not like high buildings	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council consider the Plan to be in conformity with the London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its District Centre designation, in a transform area with a high level of accessibility, TBZ4:Beckton is considered suitable to accommodate tall building developments, albeit at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 32m and 40m. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-247	Matt Ponting		Reg19-E-247/003a	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I would like to be add a lot of sweet shops. Also some [mini-park and] fast foods	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations identify main town centre uses as a priority land use need in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base to deliver a wide range of retail offer at this site. The Council is satisfied that the plan remains sound without changes.
Reg19-E-247	Matt Ponting		Reg19-E-247/003b	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I would like to be add [a lot of sweet shops. Also] some mini-park [and fast foods]	Comment noted. The site allocation requirements include the provision of pocket parks and a central public square within the site boundary as informed by the Green and Water Infrastructure Strategy.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-247	Matt Ponting		Reg19-E-247/004	Neighbourhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I would rather leave Beckton alone as its where I grew up and I like it how it is	A change to this policy approach has not been made. We did not consider this change to be necessary as this site is suitable for delivering the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base. This document sets out which site allocations were considered suitable for residential, town centre uses, social infrastructure and open space, and the evidence base documents that were used to inform these decisions. The existing community facilities and sports and recreation facility at the site will be protected through the requirements outlined in Local Plan Policies SI1 and SI3. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in these policies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-247	Matt Ponting		Reg19-E-247/005a	Neighbourhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. The youth centre is a nice place for the people to interact, chill and socialise with others. [Also, although the car park plan is a but good, it’d be sad for it to go.]	Comment noted. The existing community facilities at the site will be protected through the requirements outlined in Local Plan Policy SI1. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in this policy. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-247	Matt Ponting		Reg19-E-247/005b	Neighbourhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. [The youth centre is a nice place for the people to interact, chill and socialise with others.]Also, although the car park plan is a but good, it’d be sad for it to go.	A change to this policy approach has not been made. We did not consider this change to be necessary as this site is suitable for delivering the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base. This document sets out which site allocations were considered suitable for residential, town centre uses, social infrastructure and open space, and the evidence base documents that were used to inform these decisions. It is necessary for the consolidation of the existing car park to enable its delivery. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-247	Matt Ponting		Reg19-E-247/006	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I would like a bigger youth centre so you can chill and play pool	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 has identified a need for community facilities within the borough. The protection of existing social infrastructure and delivery of new infrastructure to meet the local needs are achieved through the requirements in Policies SI1 and SI2. Policy SI2 sets out that a sufficient supply of community facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. It is also clear in the site allocation that the existing community facilities should be re-provided meeting the requirements in Local Plan Policy SI1, and development should consider additional community facilities need as evidenced in the Community Facilities Needs Assessment 2022. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-247	Matt Ponting		Reg19-E-247/007	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. The youth club is the place to socialise and meet new epode and it’s a good place to meet new people, and I don;t want it to get taken down. [Also the car park should go because it’s not really useful and they could put shops there.]	Comment noted. The existing community facilities at the site will be protected through the requirements outlined in Local Plan Policy SI1. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in this policy.
Reg19-E-247	Matt Ponting		Reg19-E-247/007	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. [The youth club is the place to socialise and meet new epode and it’s a good place to meet new people, and I don;t want it to get taken down.] Also the car park should go because it’s not really useful and they could put shops there.	Comment noted. The site allocation will enable the consolidation of the existing car park to deliver the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan’s evidence base, which also include main town centre uses.
Reg19-E-247	Matt Ponting		Reg19-E-247/008	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. They should keep the youth club. It is very fun and should be kept forever.	Comment noted. The existing community facilities at the site will be protected through the requirements outlined in Local Plan Policy SI1. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in this policy.
Reg19-E-247	Matt Ponting		Reg19-E-247/009a	Neighbou rhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. I really don’t want the youth club to go because this place is the best place for us young people and the library is really fun - so I don’t want this place to change [and as for the car park I think it should be a park.]	Comment noted. The existing community facilities at the site will be protected through the requirements outlined in Local Plan Policy SI1. It is also clear in the site allocation that future developments at the site have to re-provide existing facilities follow the requirements in this policy.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-247	Matt Ponting		Reg19-E-247/009b	Neighbourhoods	N11 Beckton	N11.SA1 East Beckton Town Centre					Yes	Yes						Yes		[Comment provided by a local young person aged 12 – 15 at Beckton Youth Zone]. [I really don't want the youth club to go because this place is the best place for us young people and the library is really fun - so I don't want this place to change and] as for the car park I think it should be a park.	Comment noted. The site allocation will enable the consolidation of the existing car park to deliver the uses as outlined in the development principles for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan's evidence base, which also include open space.
Reg19-E-013	Transport for London		Reg19-E-013/112	Neighbourhoods	N12 East Ham South														[White Horse bus stands on Ranccliffe Road junction with High Street South and Newham Town Hall bus stands on Wellington Road will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/113	Neighbourhoods	N12 East Ham South														[Although there are no current proposals, we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/005	Neighbourhoods	N12 East Ham South														Local Plan Part 2: • N12: support for the provision of Barking Road strategic cycle corridor is welcomed.		Support noted.
Reg-19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/004	Neighbourhoods	N13 East Ham	N13.SA2 East Ham Primark					Blank	No						Blank	Vague statements under Design Principles section – (P55g).		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/114	Neighbourhoods	N13 East Ham	N13.SA2 East Ham Primark													[Ron Leighton Way bus stands on both sides of the highway on west side of N13.SA2 will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/115	Neighbourhoods	N13 East Ham														[Although there are no current proposals we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-014	CPRE		Reg19-E-014/007	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:] 3. Significant new green spaces should be created and existing parks designated as follows. • A major new park in the east: Metropolitan Open Land at Leigh Road Sports Ground N13.SA3 should <u>not</u> be allocated in any part for housing and instead the entire site should be allocated for sports / park / recreation. This should connect to the site to the south – the <u>green site to the east of Burges Rd</u> and it should all be included as a site allocation and given a clear identity as a major new park and nature reserve/habitat. This can become part of a new River Roding Park Edgelands and we urge Newham to work with River Roding Trust and the community to make this a reality for future generations.		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, 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.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/013	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													We would also request to be kept updated on development proposals for the site allocations that border Barking and Dagenham (Former East Ham Gasworks [and Gallions Reach]) so that we can work together to address any cumulative impacts of development across the borough boundary.		Comment noted.
Reg19-E-033	Thames Water		Reg19-E-033/050	Neighbourhoods	N13 East Ham	N13.SA1 East Ham Western Gateway					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/051	Neighbourhoods	N13 East Ham	N13.SA1 East Ham Western Gateway					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/052	Neighbourhoods	N13 East Ham	N13.SA2 East Ham Primark					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/053	Neighbourhoods	N13 East Ham	N13.SA2 East Ham Primark					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/054	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/055	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N13.SA3 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/002	Neighbourhoods	N13 East Ham	New Site													The land at the Lady Trower Trust Playing Fields currently comprises open scrubland. It was historically used as recreational land although this use has not taken place since the mid-20th century. The Site is designated as Metropolitan Open Land (MOL).		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/011	Neighbourhoods	N13 East Ham	New Site													This site comprises 6.08ha of land currently vacant located between East Ham to the west and Barking to the east. The site was historically utilised as a recreational ground, but it is understood that this ceased around the Second World War. It is also understood that at that time, there was development related to this use in the form of a running track, tennis courts and associated pavilion, however this use has long since ceased and this Site now comprises overgrown scrubland and grazing land, with no existing buildings present. The site is not publicly accessible.		Comment noted. A response to the inclusion of this site was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/012	Neighbourhoods	N13 East Ham	New Site													The Site is located to the east of Burges Road which forms part of a large development of early 20th century terraced housing. The North Circular (A406) is located to the immediate east and its junction with the A124 to the south. A line of electricity pylons also runs along the eastern boundary.		Comment noted. A response to the inclusion of this site was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/013	Neighbourhoods	N13 East Ham	New Site													A gap between 295 and 301 Burges Road provides an opportunity for vehicular and pedestrian / cycle access from the west, whilst there is a further opportunity for vehicular and pedestrian / cycle access from Watson Avenue to the north. In terms of wider connectivity, the A406 provides connections to the M11 and wider connections to the M25. In terms of public transport, tube services are available from East Ham station (District, and Hammersmith and City lines) which is located approximately 1km to the west and rail (London Overground, c2c) and tube services (District Line, Hammersmith, and City) are available from Barking Station. Bus stops are present on the A124 approximately 300m to the south. The site is therefore accessible and has good connectivity with the surrounding area through existing roads and public transport.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/014	Neighbourhoods	N13 East Ham	New Site													The Site is identified as being in Flood Zone 3, with the highest risk of fluvial flooding and is designated Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC). 3.5. The Site is not within or adjacent to a Conservation Area and does not contain or lie adjacent to any Listed Buildings or Scheduled Ancient Monuments. 3.6. The Site is located to the south of proposed allocation N13.SA3 Former East Ham Gasworks and shares many similar characteristics including its former recreational use and existing overgrown condition.This allocation includes a removal from the MOL		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 SINC Review (2025) includes an update to amend an error not related to your comment. Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/015	Neighbourhoods	N13 East Ham	New Site													The Site is within the single ownership of Aston Mansfield, which itself provides a significant benefit, ensuring that no additional land assembly is required, and as a locally based charity a commitment to ensure that any scheme upon the Site delivers benefits to the wider community including an enhancement of the Green Space. 3.8. Aston Mansfield would be pleased to work with Newham to develop the most appropriate scheme for the Site, and would welcome the opportunity to meet and discuss the Site’s potential.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/016	Neighbourhoods	N13 East Ham	New Site													This Site could provide circa 200 units including affordable housing. This quantum of development represents around 50% utilisation of the site area with a largely low-density flatted scheme. The remainder of the site would be retained for publicly accessible open space and ecological enhancements. The open space areas would be located on the most accessible and environmentally beneficial areas of the Site.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/017	Neighbourhoods	N13 East Ham	New Site													A significant proportion of the Site could come forward as useable open space providing opportunities to maximise biodiversity net gain, create public open space, incorporate landscaping buffers, SUDS and connect green links to the surrounding areas. The Site is available immediately and as such could be realised as soon as planning permission was granted; it could be delivered quickly.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/018	Neighbourhoods	N13 East Ham	New Site													Historically, the Site has been used for recreational uses, and more recently for the unauthorised grazing of horses. Therefore, the risk of contamination is very low and site remediation would be minimal		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/019	Neighbourhoods	N13 East Ham	New Site													The Milestones Plan (Appendix B Site Milestones Programme) prepared by Aston Mansfield details how the Site could come forward promptly, efficiently, and sustainably, with occupations by 2028.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/020	Neighbourhoods	N13 East Ham	New Site													All aspects of the detailed design of the proposed development would normally be dealt with through the planning application process, although we would welcome a meeting to discuss the options for the Site prior to this. [Figure 3.1. Site Location (See Appendix A Site Location Plan) (Google Maps)]		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/021	Neighbourhoods	N13 East Ham	New Site													Savills, on behalf of Aston Mansfield, has provided a review of the relevant policies within the draft document. The following section is divided into the Local Plan Chapters with observations and comments provided on the draft policies.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/022	Neighbourhoods	N13 East Ham	New Site													London Plan Policy G3 (Metropolitan Open Land) states that “Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.” This is therefore the right time to undertake an MOL review. 4.4. MOL is given the same status and level of protection as the Green Belt, and therefore it is pertinent to refer to the NPPF Section 13, which provides the detail of this. According to Paragraph 147 of the NPPF, “When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.” This is reiterated in Paragraph 148 (a), which is about ensuring consistency with the development plan’s strategy for meeting identified requirements for sustainable development.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/023	Neighbourhoods	N13 East Ham	New Site													The Site at Lady Trower Trust (i.e., the proposed allocation) would result in a highly sustainable proposal that would not only increase the housing numbers, but also improve the environmental conditions of the currently degraded Site. The MOL boundary is therefore inconsistent with other Local Plan strategies in Newham (namely public open space deficiencies and housing need), and contrary to Paragraph 148(a)	The Site at Lady Trower Trust Playing Fields should be, in part, removed from the MOL designation and be given a site allocation for housing.	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.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/024	Neighbourhoods	N13 East Ham	New Site													In addition, the Paragraph 148(b) states that “plans should... not include land which it is unnecessary to keep permanently open”. At present, the Site provides no public benefits and therefore could be vastly improved if removed from the restrictive MOL designation, and instead allocated for housing and public open space		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.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/025	Neighbourhoods	N13 East Ham	New Site													Referring specifically to London Plan policy G3, the criteria for MOL designation is as follows: “1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area. 2) it includes open air facilities, especially for leisure, recreation, sport, the arts, and cultural activities, which serve either the whole or significant parts of London. 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value. 4) it forms part of a strategic corridor, node, or a link in the network of green infrastructure and meets one of the above criteria” 4.8. Dealing with each of the above points in turn, the Site does not possess any of the features that warrants its allocation within the MOL and therefore should be removed from the MOL designation.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/026	Neighbou rhoods	N13 East Ham	New Site													The Site is not clearly distinguishable from the development that surrounds it on all sides; residential to the north, south and west, and the North Circular to the east. The Site is not visually attractive, with electricity pylons across the site, and it can only be seen from very few locations on the surrounding residential streets. It is surrounded by residential development, and therefore is not clearly distinguishable from the built-up area. 4.10. The Site is not accessible to the public and therefore provides no benefits in this regard. 4.11. The Site provides no historical or recreational features. Whilst the Site is identified as a SINC, it is possible to demonstrate through additional studies, that appropriate development could result in net ecological enhancements. 4.12. The Site does not provide part of a Green Chain or link of green infrastructure and is privately owned so the public are not able to access it. The Site is bound by residential development and gas holders beyond to the north (as per site allocation) and an access road to south. As such, there is no continuous green route.	Considering the above, this Site should be removed from the MOL, along with Former East Ham Gasworks (allocation N13.SA3), which has also been removed in part.	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.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/027	Neighbou rhoods	N13 East Ham	New Site													The MOL currently represents a fragmented series of inaccessible green spaces; our Site would be better served by a comprehensive housing and open space masterplan. The benefits of a housing development on this Site alongside enhanced publicly accessible recreational facilities, would outweigh any loss of MOL and therefore the Local Plan has not been positively prepared because this balance has not been considered		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.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/066	Neighbou rhoods	N13 East Ham			N13.1											Object: Supporting development that enhances the neighbourhood’s character should apply across the entire Neighbourhood Area. The policy should seek more than a ‘Moderate uplift’ in density, which limits the potential of sites within locations well served by public transport to deliver new housing.	Suggested revised wording. 1. supporting development in ‘enhance’ areas that enhances the neighbourhood’s character and is sympathetic to and respects the character of its historic terraced streets through ~~form~~ , detailing and materials. ~~Moderate~~ An uplift in density will be supported, particularly in areas of mixed-urban form or fragmented character, where it enhances the character of the area and follows the block structure of the consolidated urban fabric;	This wording change is not supported. We did not consider this change to be appropriate as the Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, large part of the neighbourhood is classified as enhance area. The Council considers that the vision for N13 East Ham supports an appropriate balance between a moderate uplift of enhance areas [N13.1] and the transformation of identified site allocations [N13.2], which have already taken into account the high level of accessibility of the sites. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/067	Neighbourhoods	N13 East Ham			N13.12											Object: Retention of mature trees too broad and could restrict level of development upon otherwise appropriate sites.	Suggested revised wording. retaining existing mature trees as far as is practicably possible and maximising the provision of new open space, green infrastructure and green links and the opportunities to increase biodiversity,	A change to this policy approach has not been made. This wording change 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 remains sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/068	Neighbourhoods	N13 East Ham			N13.11											Support desire to secure public access to green spaces currently inaccessible to public subject to recreational and biodiversity improvements to these spacesThe release of the Site alongside the former East Ham Gasworks which are both currently within private ownership and closed to the public can secure this aim, but this would need to be as part of a development scheme on the site.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/069	Neighbourhoods	N13 East Ham			N13.12											Object: To the protection of playing fields at the site as playing fields no longer exist, and therefore the policy is misleading.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement to protect the playing pitches, albeit currently disused, at Lady Trowers Trust Playing Field has been justified by up to date evidence base. Newham's Playing Pitch Strategy is the evidence used to inform our policy approach to the borough's playing fields and pitches. This evidence was produced in collaboration with Sport England. The Strategy has established that the Lady Trowers Playing Fields are a disused playing pitch site which is needed to be brought back into use to eradicate shortfalls in pitch provision. The Council is satisfied that the plan remains sound without the proposed changes
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/070	Neighbourhoods	N13 East Ham			N13.12											Support: Desire to see enhancements of playing pitches at the Site subject to it forming part of an allocation which will secure enhancements.		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/071	Neighbourhoods	N13 East Ham			N13.15											Comment: Paragraph 186 of the NPPF states "Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. and so far as possible these opportunities should be considered at the plan-making stage. So far as possible these opportunities should be considered at the plan making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications".Policy identifies opportunity for air quality improvement, however, does not set out mitigation measures and leaves uncertainty as to how addressed at planning application stage.		The Council considers that examples of how poor air quality in the borough could be mitigated and improved are set out in the implementation text of policy CE6, the Newham Characterisation Study, as well as in GLA air quality guidance.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/073	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Support Allocation - This Site is located to the immediate north of Lady Trower Trust Playing Fields and as a former recreation ground currently inaccessible to the public shares many similar characteristics within a similar context.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/074	Neighbourhoods	N13 East Ham	New Site													In addition to the above, an additional site allocation should be added to the Local Plan as an independent allocation, namely Lady Trower Trust Playing Fields. Given the different land ownership of the two sites, they should not be under the same allocation, but it is evident that the two sites are closely related as they have similar land use designations.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/075	Neighbourhoods	N13 East Ham	New Site													By including further land to the south of N13.SA3 Former East Ham Gasworks, it will provide the opportunity for a larger more comprehensive redevelopment strategy in this part of the Borough, including improvements to MOL and the provision of a useable and attractive green link, whilst recognising the different private landownership of each site		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.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/076	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													The 1.6 hectares of identified developable land consist of land that formerly consisted of tennis courts, sports pavilion, and a gas holder. As with Lady Trower Trust Playing Fields, which also historically comprised a tennis court, running track and sports pavilion, these uses have long since ceased and the land now comprises overgrown scrubland. The inclusion of Lady Trower Trust Playing Fields as a allocation will further support the provision of a continuous chain of accessible open space within LBNs eastern boundary.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/077	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Support: A similar principle can be applied at Lady Trower Trust Playing Field, creating a chain of highquality recreational land.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/078	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													This Site sits within flood zone 2 and 3. The policy provides an evidence led approach to flood risk management, which could be continued on Lady Trower Trust Playing Fields (located within Flood Zone 3).		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/079	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Support suggested building heights, which can be continued onto Lady Trower Trust Playing fields without any loss of character.		Comment noted. A response to the inclusion of this site was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/080	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													The allocation of Lady Trower Playing fields provides a further opportunity for vehicular connections between Watson Avenue and Burges Road and pedestrian and cycle connections between Watson Avenue and Newham Way (A13).		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/083	Neighbourhoods	N13 East Ham	New Site													The accompanying (WMS) provides further guidance: “large areas of the Green Belt have little ecological value and are inaccessible to the public. Much of this area is better described as ‘grey belt’: land on the edge of existing settlements or roads, and with little aesthetic or environmental value.” 5.6. We would therefore consider the Land at Lady Trower Trust Playing Field to constitute Grey Belt Land.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. In addition, it should be noted that 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, Please note Newham’s MOL Review (2025) includes an update to amend an error not related to your comment.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/084	Neighbourhoods	N13 East Ham	New Site													The WMS proposes a strategic sequential led approach to the release of land, with authorities asked to give consideration first to brownfield land, before moving on to grey belt sites and then to higher performing Green Belt land. It is also clear that whenever Green Belt land is released, it must benefit both communities and nature, including providing accessible green space. 5.8. It is that the Green Belt should not be a barrier to development per se – so long as the land in question is in a sustainable location; provides suitable affordable housing and local infrastructure; is not subject to an existing environmental designation; and does not serve – or significantly undermine – a Green Belt function. 5.9. The amendments to the NPPF and WMS make clear the importance of Planning in effectively delivering the Governments growth agenda		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. In addition, it should be noted that 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, Please note Newham’s MOL Review (2025) includes an update to amend an error not related to your comment.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/088	Neighbourhoods	N13 East Ham	New Site													Lady Trower Trust Playing Fields is currently allocated as MOL and SINC, however, due to the poor quality and ‘wasteland’ nature of the inaccessible site and given that appropriate mitigation measures can be implemented to prevent any adverse environmental impacts, the Site should be reallocated for housing to unlock its true potential and would provide significance benefits, both social and environmental. This includes acting as enabling development to unlock the ability of the land to provide high quality publicly accessible recreational facilities in perpetuity, which as a charity Aston Mansfield would be unable to otherwise provide.		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 SINC Review (2025) includes an update to amend an error not related to your comment. Please note Newham’s MOL Review (2025) includes an update to amend an error not related to your comment.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/089	Neighbourhoods	N13 East Ham	New Site													The singular ownership and lack of delivery constraints alongside the willingness at Aston Mansfield to work with the LBN to improve the Lady Trower Trust Playing Fields presents a significant opportunity for delivery over the plan period in accordance with the aims of the NPPF		Comment noted. A response to the inclusion of this site was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/090	Neighbourhoods	N13 East Ham	New Site													This is a rare opportunity for LBN to unlock a site that can make a significant contribution to the existing community and deliver enhanced quality and accessible open space. Moreover, the Site would also deliver much needed affordable housing in an area that the LBN are focusing on regeneration and renewal given the Site's proximity to the centre of East Ham, as well as delivering new homes that would reduce the Borough's housing delivery deficit, and towards the London housing market as a whole.		Comment noted. A response to the inclusion of this site was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/002	Neighbourhoods	N13 East Ham														Vision and Objectives Primark support London Borough of Newham's ('LBN') Vision and Objectives for the Borough, including the changes proposed within East Ham, for example, East Ham being identified as a Transform Area. Primark seek to work proactively with LBN to help transform the Site in the future.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/011	Neighbourhoods	N13 East Ham	N13.SA2 East Ham Primark					Yes	Yes						Yes	Draft Site Allocation N13.SA2 East Ham Primark The development principles within the draft site allocation for the Site identifies the potential future uses on site as residential, retail and social infrastructure including community facilities. The draft site allocation also seeks the delivery of social infrastructure/community facilities, which has been introduced since the Regulation 18 consultation. In terms of design principles, the draft site allocation seeks for the Site to be designed and developed comprehensively in accordance with draft Policy BFN2 (Co-designed masterplanning), and that the opportunity to include the adjacent car park as part of the comprehensive development of the site should be explored. The design principles also state that: “Mid-rise residential buildings below 21 m (ca. 7 storeys) are the most appropriate form of development, which sensitively integrate with the scale and massing of the existing urban fabric. Development to the rear of the High Street North should be set back from existing buildings and should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, by following the existing building line on High Street North”. The site allocation also seeks for the provision of a pocket park on Pilgrims Way to be explored, which is also a new introduction since the Regulation 18 consultation. Primark supports the site allocation for the Site, and supports the development principles of residential and retail use, however, it requested that the requirements for social infrastructure and community facilities is removed, or sufficient flexibility is introduced into the wording for the site allocation. LBN themselves recognise that there is already an above average number of community facilities in the East Ham neighbourhood (see page 550, paragraph 4.62), therefore, it is queried whether a community facility would be needed within the site allocation. Paragraph 4.62 (page 550) of the Draft Submission local Plan (Regulation 19) document states: “The neighbourhood has 43 community facilities, including a number of civic buildings, higher education facilities, community centres and 28 places of worship. The neighbourhood’s provision of community facilities is above the Newham average number of community facilities per km2”.	While new ‘asks’ are being introduced to the site allocation since Regulation 18 stage, the height parameters within the site allocation have effectively remained the same. In the first instance, it is requested that flexibility is brought into the site allocation regarding the development principles with the wording amended as follows (new text in bold and deletions in ~~strike through~~): “Development principles Residential, and retail. ~~Social~~ infrastructure, including community facilities, should be explored.”	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is positively prepared and justified, aiming to deliver the priority land use needs as identified in various evidences. Policy BFN2 requires applicants to deliver development principles in the site allocations using the masterplanning approach. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-184	Primark Stores Ltd		Reg19-E-184/012	Neighbou rhoods	N13 East Ham	N13.SA2 East Ham Primark					Yes	Yes						Yes	The development principles of social infrastructure and community facilities have been introduced into the site allocation since Regulation 18, and if adopted, would introduce a further viability challenge to the delivery of a redeveloped site. The Site is already expected to deliver housing, affordable housing, public realm improvements, open space and other public benefits, however, the design principles do not acknowledge these further challenges by allowing for a tall building on part of the Site.	Primark acknowledges the prevailing low-rise context across the majority of the East Ham neighbourhood, however, along High Street North and Ron Leighton Way, a new context is emerging with tall buildings, and the site directly opposite Pilgrims Way is designated for tall buildings, including one extending to 50m in height. Therefore, it is requested this context is recognised, and if the site allocation wording is not amended as detailed below, it is requested that sufficient flexibility is introduced into the wording to allow a tall building on the southern part of the Site through adequate justification i.e. high quality design, townscape and visual impact analysis, and ensuring there is no detrimental impact to surrounding residents and businesses. Primark supports the design principle of a sensitive scale of development to the rear of the existing buildings fronting onto High Street North. In terms of the design principles, it is requested that wording of the site allocation is amended as follows (new text in bold and deletions in ~~striketrough~~): “Mid-rise residential buildings below 21 m (ca. 7 storeys) are the most appropriate form of development, with an opportunity for a tall building on the southern part of the site to be explored, which sensitively integrates with the scale and massing of the existing urban fabric. Development to the rear of the High Street North should be set back from existing buildings and should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, by following the existing building line on High Street North Any tall building should be designed and developed comprehensively in accordance with Local Plan Policies BFN2 and D4”.	This wording change is not supported. We did not consider this change to be appropriate as the Council considers the plan to be positively prepared. Location for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets as shown in the Tall Building Annex (2024). The tall buildings assessment fed into the site allocations capacity testing which provide the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Through the tall building assessment, it was concluded that, whilst the site meets some of the criteria to be identified as a suitable location for tall building developments, the constrained nature of the site and its proximity to the low rise context make the site not suitable for a well-designed and deliverable tall building. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-184	Primark Stores Ltd		Reg19-E-184/013	Neighbou rhoods	N13 East Ham	N13.SA2 East Ham Primark					Yes	Yes						Yes	[The development principles of social infrastructure and community facilities have been introduced into the site allocation since Regulation 18, and if adopted, would introduce a further viability challenge to the delivery of a redeveloped site.] The impact of redevelopment of the Site on the trading of the Primark store should also be acknowledged and recognised in the draft site allocation, in terms of the potential viability challenges, to encourage the redevelopment of the Site.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/115a	Neighbourhoods	N13 East Ham														15 Neighbourhood N13 East Ham Adopted Newham Local Plan (2018) 15.1 The adopted local plan identifies the principal areas of previously developed land, and the MOL classification (GS82), replicated below at Figure 15.1. [see pg 44] 15.2 The adopted site allocation broadly reflects the previously developed land at the surface (2.04ha), albeit there are numerous below ground structures as denoted at Figure 15.3. [see figure 15.2 Aerial Image of Site at pg 44, and Figure 15.3 at pg 45]		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/115b	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Regulation 19 Newham Local Plan 15.3 The former East Ham Gasworks comprises a gas holder and associated gas operational equipment located on previously developed land accessed off Leigh Road along the eastern edge of the Borough located within a wider setting of Metropolitan Open Land ('MOL'). The gas holder is a tall building (approximately 52m AOD in height) for the purposes of local plan and London Plan [footnote 1 at pg 45: London Plan Policy D9(A) definition of a tall building and Reg 18 Policy D4 (Tall buildings in Newham are defined as those at or over 21m (roughly seven storeys))] 15.4 There are multiple gas easements and Thames Water structures which cross the site, some of which are underground, as illustrated at Figure 15.1 below [see pg 44]. The site is not permeable, is not, nor has it been, publicly accessible. It is anticipated that remediation works would be required to open up the site for public access. This would require the removal of the top layer of soil from the site. 15.5 The site is located within Policy N13 East Ham (one of 3 site allocations) as Site allocation N13.SA3 Former East Ham Gasworks.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/116	Neighbourhoods	N13 East Ham														15.6 The Regulation 19 proposals map retains the designation of the majority of the site as MOL (except the gas holder frame and previously developed land) but, unlike the adopted proposals map, now allocates the site as open space GWS1 East Ham Sports Ground, albeit recognising that it “not accessible” (except for the gas holder frame itself). It is also important to note that the Site has always been in private ownership and that its historic sport facilities were predominantly used by employees of the various local gasworks and not specifically for wider public use. 15.7 The designation of the MOL remains the same area and the reconfiguration is considered to be minimal. St William remains of the view that a substantial amendment to the MOL allocation and the GSW1 East Ham Sports Ground by designation is necessary to deliver development within the allocation. St William agrees with the Criteria A assessment of the MOL which confirms that the reorganisation of the MOL will form a more coherent parcel whilst protecting its core function. However, it is unclear why an insubstantial quantum of MOL has been removed or why the extent of the changes of the boundary are proposed to be so minimal. 15.8 As identified within the Area 21 assessment, the parcel has weak-moderate recreation and biodiversity value. The previously development land should also not constitute open space, as has been identified. Therefore, it is considered that the site does not meet the tests of MOL. Emerging Policy GWS1: Green spaces protects existing open space to ensure there is no net loss, except where it meets the criteria in part 2 which supports development in exceptional circumstances. We consider that it would not be appropriate to allocate, and require open space reprovision, on land not used as open space, and particularly land that is previously developed. 15.9 A new SINC is proposed and the justification of this will require further assessment, particularly given the likely high levels of contamination across the site and the ‘weak-moderate’ biodiversity value identified within the MOL Review. In St William’s experience, holistic site wide remediation will be required to bring this site forward.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/118	Neighbou rhoods	N13 East Ham														N13 East Ham 15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below. § Point 1: Moderate uplift in density will be supported where it enhances the character of the area, particularly in areas of mixed urban form. We consider that design led optimisation as required by the London Plan and local Policy D3 should be promoted. The scale and volume of the existing gas holder represents a tall building on previously developed land which informs the existing character and appearance of the area.	Appendix 15: N13 East Ham Neighbourhood – Suggested amendments Vision Point 1 supporting development that enhances the neighbourhood’s character and is sympathetic to and respects the character of its historic terraced streets through form, detailing and materials. Moderate uplift in density, when informed by a design led approach , will be supported where it enhances the character of the area, particularly in areas of mixed urban form;	This wording change is not supported. We did not consider this change to be necessary as the Council consider the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, large part of the neighbourhood is classified as enhance area. The Council considers that the vision for N13 East Ham supports an appropriate balance between a moderate uplift of enhance areas [N13.1] and the transformation of identified site allocations [N13.2], which have already taken into account design-led approach considerations in line with London Plan Policy D3. Furthermore, gasholders are metal structures rather than buildings, therefore, we disagree with your view that existing gasholders can be considered justifications for new tall buildings. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/119	Neighbou rhoods	N13 East Ham														[N13 East Ham 15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below.] § Point 4: The East Ham Tall Building Zone should include N13.SA3 owing to the scale of the existing gasholder on site. The proposals map should be amended and Local Policy D4 should be revised to reflect the height of the existing gas holder. LBNs Characterisation Study (June 2024) has omitted the existing tall building on site and unlike the other gasworks in the Borough, is subject to limited reference within the study.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/120	Neighbou rhoods	N13 East Ham														[N13 East Ham 15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below.] § Point 9: Requiring new and improved walking and cycling links to the neighbourhood’s network of green spaces and nature and to and along the River Roding in partnership with London Boroughs of Redbridge and Barking and Dagenham – a major policy objective that we can assist with, but with change to the MOL designation.		Support noted for point 9. Regarding your comment seeking the de-designation of this site from MOL, 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/121	Neighbourhoods	N13 East Ham														[N13 East Ham 15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below.] § Point 11: Securing public access to green and blue spaces currently inaccessible to the public, particularly along the River Roding and at N13.SA3 Former East Ham Gasworks is a policy objective that is supported but will require development to facilitate and fund these improvements.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/122	Neighbourhoods	N13 East Ham														[N13 East Ham 15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below.] § Point 12: In respect of protecting and enhancing the playing pitches and sports courts courts, the previous sports ground did not have wider public access as was in private ownership and the predominant use was by former employees.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/123	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													N13.SA3 Former East Ham Gasworks Development principles § The development principles of residential development and open space are supported.		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/124	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													[Development principles] § We would like to work with the Council to understand the reference to a community facility. We consider that the provision of such a community facility would need to be viable, when considering the wider costs associated with the Site, and the specific proposed use would be subject to a needs-based assessment.	[Appendix 15: N13.SA3 Former East Ham Sports Ground Leigh Road East Ham – Suggested amendments] [Development principles] Residential, open space and community facility, subject to a needs based assessment . [Design principles] [...] The design and layout of the site should establish a connected network of streets and spaces and that connects into the existing street network and should create a street hierarchy. Routes to, from and through the site should improve access and connectivity to and along the River Roding and through the site from Southend Road through to Watson Avenue. ~~The~~ Any community facility provided should be located where there are good connections to the existing street network and in proximity to the open space.	A change to this policy approach has not been made. We did not consider these changes to be necessary as the Community Facilities Needs Assessment (2022) has identified a need for community facilities. As set out in Policy SI2, the Local Plan is not supportive of speculative community facilities. It is for this reason the development principles for the site allocation also states ‘...should it be demonstrated that the needs of the community have already been met there will be no requirement to deliver a community facility...’. The Local Plan is applied in the round. The development principles section of the site allocation duly directs the reader to Local Plan Policy SI2 for the delivery of this element. Policy SI2 clause 1.a sets out that a sufficient supply of community facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/125	Neighbou rhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Design principles § “Mid-rise residential buildings below 21m 9ca. 7 storeys)” does not reflect the character of the existing site, or the presence of a tall building on site. The building heights should be increased. § Framework paragraph 124 gives “substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.” § LP Footnote 59 also recognises that “some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available”.	[Appendix 15: N13.SA3 Former East Ham Sports Ground Leigh Road East Ham – Suggested amendments] The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should follow a design led approach and be in line with Policy D4 and the East Ham Tall Building Zone. ~~Mid-rise residential buildings below 21m (ca. 7 storeys) are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric.~~ Massing should step down towards the east of the site to sensitively integrate with the existing two storey terraces on Leigh Road.	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because the locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, the N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall building developments. Therefore, your proposed modification to extend the TBZ3: East Ham to include the site is not supported. Furthermore, the site allocations requirements result from an evaluation that already addresses design-led approach considerations in line with London Plan policy D3. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/126	Neighbou rhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ Former gasworks sites benefit from specific London Plan policies, and the full weight of the Framework. They represent an opportunity to remediate despoiled, degraded, derelict and contaminated land and are subject to substantial decontamination, enabling and remediation costs. The following wording should therefore be included to the Site Allocation:- “Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gas works [footnote 2 at pg 50: This wording was proposed and adopted in the Tower Hamlets Local Plan review for 3 gasworks site allocations.]”		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is justified, effective and positively planned. All the site allocation policies are consistent and set out the broad parameters for each site regarding development principles, design principles, infrastructure requirements and phasing and implementation. The detail proposed would be considered on a case-by-case basis during the development management process. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/126a	Neighbou rhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ The allocation of the site as SINC does not practically align with the allocation's land use aspirations, including the sports use. Given the previous use of the site, wide-scale remediation is required that will remove all existing biodiversity value. The SINC kdesignation on the site is not supported and should be removed from the allocation.		A change to this policy approach has not been made. We did not consider this change to be necessary as the SINC designation is justified by up to date evidence. 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 or 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: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. 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). Please note that Policy GWS3: Biodiversity, urban greening, and access to nature, part 6 sets out the mitigation hierarchy which should be applied to minimise development impact on Sites of Importance for Nature Conservation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													Opportunities, Public Benefits and Exceptional Circumstances § In weighing the balance of opportunities, public benefits and exceptional circumstances that support an alternative approach to MOL boundaries at N13.SA3 Former East Ham Gasworks, as outlined within the Regulation 18 Representations, we have again set out below three scenarios for the site. § Do nothing scenario – the Site comprises an impermeable contaminated former gasworks site, with operational gas equipment. It does not meet the LP Policy G3 criteria for MOL designation, does not comprise publicly accessible open space and does not currently afford the local community any public benefit. To change this scenario it is necessary to deliver enabling development on site to fund remediation and deliver wider public benefits. § Regulation 19 Policy Scenario – Development of 7 storeys on the undesignated ‘white’ land proposed in the Regulation 19 Plan will not deliver the aims and objectives of N13.SA3 Former East Ham Gasworks. The abnormal costs of bringing forward a gasworks site for residential development are substantial, as would be enhancing the quality and range of uses of MOL in accordance with Policy G3, in addition to opening up the site for public use and benefit which would require significant de-contamination which would likely be require the whole site to be remediated. In its current form the wording of N13.SA3 would deliver around 300 new homes (at 7 storeys) which may give rise to viability challenges of deliverability taking into account other policies of the local plan, including the delivery of affordable housing. § The alternative scenario – To achieve the objectives of the Plan as a whole, and to support enhanced quality and range of uses of MOL, de-designation of the entirety of the MOL (or part of it) for enabling development would generate significant public benefits including the remediation of the whole site for public use, enabling it to be opened up or public access. The Newham Metropolitan Open Land Review (2024) unequivocally does not reconfigure the boundary of the MOL that enables the allocation to deliver enough development to achieve the wider site allocation requirements, specifically the provision of leisure and recreation uses. It is estimated that a significant uplift in homes estimated at 700 homes would be needed, for example, across the southern half, to facilitate MOL improvements to the northern half.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128a	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ We set out below important material considerations which inform the alternative policy approach to the site. § London Plan – Policy H1 of the London Plan designates surplus utility sites as a strategic source of housing supply in London. § Strategic undersupply of homes in London – The London Plan is not able to meet the objectively assessed need for housing in London of 80,000 homes per annum and is currently in deficit for both market housing and affordable homes. § Local undersupply of homes in Newham – To assist LBN in meeting the objectively assessed need for housing locally and to address current deficits for both market housing and affordable homes (and the shortfall of 15,721 homes) the site would be able to make a significant contribution. § Using brownfield land for homes – Paragraph 124 of the Framework gives substantial weight to the value of using suitable brownfield land within settlements for homes. The previously developed land on site, and its curtilage, is significant and can contribute to housing supply. § Using brownfield land for homes – Paragraph 124 of the Framework gives substantial weight to opportunities to remediate despoiled, degraded, derelict and contaminated land. This abnormal and onerous extent of gas sites is significant and recognised by the London Plan. § Proposed housing - High quality new homes would contribute towards the Borough’s increased annual housing target in the London Plan; and its plan to deliver additional homes to meet its minimum housing needs.		A change to this policy approach has not been made. We did not consider a change to be appropriate as the type of development that comes forward will be managed through the design principles in the relevant site allocations as well as Local Plan policy D4 Design-led residential site capacity optimisation, which has been informed by robust evidence base such as the Newham Characterisation Study and Tall Building Annex. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128b	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ Building beautiful – The proposed replacement of the existing gasholder frame, of no aesthetic or heritage value, with high quality buildings that respect the residential character and appearance of the area whilst respecting the industrial spirit of the previous use in a more appropriate form would enhance the character and appearance of the area.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128c	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ Public access and permeability – The site has been inaccessible for decades and forms an impermeable barrier between various communities. This situation is exacerbated by the existing road network. The opening up of the site to the public to create a direct, overlooked, and visually permeable open space for walking, cycling (and sport) is a significant public benefit.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128d	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ MOL function – Proposals to enhance access to the MOL and improve the poor quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL including improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage in accordance with London Plan paragraph 8.3.4 would be a public benefit.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128e	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ Economic – This development will generate improved economic productivity as a result of job creation; resident local net expenditure; council tax; new homes bonus and CIL. The Berkeley Group invest in construction jobs and the delivery of a Local Employment and Skills Plan that offers training and apprenticeship opportunities to local young people during the construction. § Social benefits – The development will support a strong, vibrant and healthy community, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health and social well-being. Improvements to social value to the local community will implement Berkeley’s unique Social Sustainability Assessment.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/128f	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													§ Hazardous Substances Consent – Redevelopment of the site will lead to the revocation of the existing hazardous substances consent. This will reduce the extent to which there might be a public health hazard arising from this site. § Individually and cumulatively, these material considerations are a benefit of redevelopment at N13.SA3, and could only be delivered in the alternative policy scenario. § Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at Appendix 15.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/129	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks														[Appendix 15: N13.SA3 Former East Ham Sports Ground Leigh Road East Ham – Suggested amendments] [Phasing and implementation] Medium ~~to long~~ term	A change to this policy wording has not been made. We did not consider this change to be necessary as the phasing and implementation is justified as it is consistent with the phasing methodology for site allocations set out in the Site Allocation and Housing Trajectory Methodology Note. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-007	David Gilles		Reg19-E-007/040	Neighbou rhoods	N14 Green Street						Blank	Blan k						Blank	N14 Green Street: the R19D sets out a curious retreat from any vision at Queens Road Market. The 2018 Approved Local Plan 2018, at P275 says about the Market in a separate site allocation: “Allocation including tall buildings specifications. Mixed-use redevelopment comprising retail, residential and community uses (notably healthcare) and including retention of a viable market to provide a central focus for the site’s commercial and community role, as well as improvements to the site’s relationship with the wider town centre and adjacent station, where step-free access will be facilitated. Indicative building heights of 8 to 12 storeys with potential for a step-up in height of up to 19 storeys at station and stepping down to the low- rise residential context.” The Draft Regulation 18 Local Plan 2022 at P480 says in a separate site allocation about the Market: “Development principles Option one: Refurbishment and modernisation of Queen’s Market and Hamara Ghar, retail, community facilities and improved public realm. Community facility floorspace should include a health centre designed to meet NHS needs and standards. Option two: Refurbishment and modernisation of Queen’s Market and Hamara Ghar, retail, community facilities, employment and industrial uses and improved public realm and residential development. Community facility floorspace should include a health centre designed to meet NHS needs and standards, library, community centre and childcare facility. Employment and light industrial uses should provide workspace.” The Regulation 19 Draft Local Plan 2024 no longer contains a separate site allocation for Queens Road Market and at P P547 says “The vision for Green Street will be achieved by..... 4. protecting and enhancing the role of Queen’s Market by: a. requiring improvements to the public realm, toilets and market facilities; b. supporting the provision of improved public spaces to support cultural and pop-up activities during the day and into the evening and night-time; c. supporting a range of uses including retail, employment uses, community facilities and a childcare facility; d. exploring opportunities for additional housing in accordance with Green Street Tall Building Zone and Local Plan policy D4, whilst managing the transition to the surrounding low rise context; and e. supporting the conversion of 412 – 416 and 420 Green Street to provide a cultural and wellbeing community space:” A more visionary approach for the Market’s future would be to approach TFL about the possibilities arising from a comprehensive redevelopment of the area which includes Upton Park Station and the Market by eg putting a raft over the station and Queens Road (and/or	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan provides a sustainable and deliverable policy option for Green Street as per the Integrated Impact Assessment. The Local Plan cannot create policy for development land which is not currently available. Policy applies in the round, so if development comes forward and includes major development housing, the affordable housing policy will apply. Policy HS4 will protect the function of the market and support its enhancement, recognising it is already a significant driver of footfall for Green Street Town centre. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			diverting/stopping up Queens Road) to create a new market at ground level with other uses above, which could include 100% genuinely social and affordable homes. One objective might be to increase footfall in the market by it having a wider appeal to Newham residents and others who do not currently consider shopping there. Without such an approach, or another one which changes the current dynamic of the Market, it will inexorably and slowly die as other markets such as Wardour Street or Exmouth Street have done. This must be approached in the context of comments made elsewhere about gentrification, and local concerns about a possible loss of the market for its present client group and significant distrust of the Council and its motives. However, the view of current traders at Queens market cannot be determinant in preventing the provision of affordable homes on this site.		
Reg19-E-013	Transport for London		Reg19-E-013/116	Neighbou rhoods	N14 Green Street														[We support the vision of Green Street to include provision of step-free access at Upton Park station. This would need to be wholly funded through developer contributions or other funding sources because TfL is currently not able to commit funding] We note that there is no mention of development funding for step free access.		A change to this policy approach has not been made. We 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 Report. The Council is satisfied that the plan remains sound without this change.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/056	Neighbou rhoods	N14 Green Street	N14.SA1 Shrewsb ury Road health complex					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/057	Neighbou rhoods	N14 Green Street	N14.SA1 Shrewsb ury Road health complex					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/003	Neighbou rhoods	N14 Green Street						Blank	No						Blank	The Plan claims that the council will ‘retain’ and ‘protect’ the market (see the N14 Green Street Vision). It is therefore necessary that the Plan sets out the facts of the attributes of the existing market as it stands today, as recognised by its users and by the council, if the same market is to be protected. We note that the site allocation for the Market has been withdrawn. Regardless of this, the Plan is unsound because it will not ‘protect’ the Market in the way that is required. Should the site be developed in ways proposed - as seen in the Green Street Vision and a Tall Building Zone in Green Street - the market would not survive in its current form as an affordable market with affordable rents that enable low prices for customers; a place where shoppers in their thousands depend on those low prices for their survival. A council-built scheme is unlikely, so the site would be passed to private developers who would have no reason to retain the low-cost rents for shops and stalls. The Council would forfeit its control of those rents and its provision of the market. We have found no precedent for a street market being able to continue operating in the same way encircled by new development: the common outcome is the alienation and displacement of existing users and traders.		Comments noted. The Local Plan cannot dictate who the operator of a market should be, whether public sector or private sector, as this is not a material planning consideration. The operational model of existing street traders, including the scope of the goods on sale and their prices, are also not material planning considerations. The Council’s objective is to protect the viability and vitality of all existing markets within Newham, including Queen’s Market. Market-specific context will be taken into consideration as and when planning applications are submitted. The policy is positively prepared and proportionally justified by the findings and recommendations of the Retail and Leisure Study (2022), and the approach is supported by Newham’s Markets Team. Market stalls do not provide long term trading stability to individual traders (leases are usually short term, or up to 12 months), and therefore the policy cannot protect existing operators beyond the conditions of their existing trading leases. Instead, policy seeks to ensure that the markets functional/physical capacity is protected and enhanced. It is not clear from your comment what impact you expect the tall building zone allocation to have on the functionality of the market, in the context of the existing tall building on site and the criteria for quality control for tall buildings set out in policy D4 of the Plan. The Council believes that they can continue to co-exist successfully. The Council is satisfied that the plan is sound.
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/004	Neighbou rhoods	N14 Green Street														In the council’s explanation of the withdrawal of the site allocation, reference is made to the Queen’s Market and Hamara Ghar Investment Strategy that began in 2020. In May 2024 the public was presented with only two “options” for a future strategy - reduced from the original five options - both of which involve the demolition of the entire market site (not the Hamara Ghar building) to build housing and a health centre. The public has objected strongly to the threat of loss of the market buildings and the market, such as through a petition of over 6,000 names, and we wait to see whether these objections will be taken into account. NB our letter about the consultation in May can be found here: https://friendsofqueensmarket.org.uk/wp-content/uploads/2024/07/foqm-consultationletter-june2024.pdf		Comment noted. The details of any options scoping for the future of the market are not a material planning consideration until a planning application is put forward, and was previously used for the purpose of demonstrating that land is available and deliverable, in line with the requirements of the NPPF for identifying site allocations. This context has now changed and the site allocation has been removed. The policy is positively prepared and justified by the evidence base, to protect the market and guide the types of interventions that respond to local need. As and when a planning application may come forward affecting Queens Market, the policies of the plan will be used to secure the protection of the market. The Council is satisfied that the policy is sound.

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

Markets:

- Strong community focus, adds vibrancy, colour and variety to urban town centres making them a focus for visitors
- Specialist markets attract a wider catchment which also benefits the surrounding town centre
- Widens the range of goods that might otherwise be available in the town centre
- Supports businesses in immediate vicinity that provide a service to market traders and the public.
- High quality or ‘famous’ markets attract a visitor economy
- Small-scale employment opportunities
- Low cost goods available due to low rents.
- Stimulates fledgling businesses: an opportunity for new traders to test the market for new products and services

Page 178 Key locations for the community (meeting places, local shopping parades, parks, and so on

- Priory Park
- Specialist Asian shopping/leisure destination
- Queens Market
- Various community centres across the area, including youth clubs
- Various pubs (e.g. The Queens, The Duke of Edinburgh, The Boleyn)
- Green Street Local Service Centre/ Library
- Various churches, Islamic centres and temples, and schools.

Strengths

- Asian identity of town centre. Green Street is an international retail destination for Asian clothing, jewellery and accessories, particularly wedding related items.
- Also includes Queens Market, an important retail and community space, and other key retail clusters.

Page 180 Areas of sensitivity to change

- Cultural sensitivity of schemes on Green Street, given its London-wide draw for Asian shoppers and also attractions for international visitors.
- Other important locations for the community (as identified above)

D) Newham Characterisation Study 2024 - Vision neighbourhood principles on pages 250-51 state:

‘The Queen’s Market was specifically noted as a key asset through the engagement process. “I visit three times a week. It is important for socialisation (...) It is essential to my household’s wellbeing because I buy fruit and veg there at the most affordable prices in Newham” according to public engagement findings.

‘Socioeconomic and cultural significance: a focal point highlighted by the local community is Queens Rd Market.

‘The transform area at Upton station should be mindful of the area’s significance for the local community. The area includes the Queens Market, which is very appreciated by the local community.’

E) The Report by Leeds University, Markets4People (2020) is a detailed survey of the Market’s community value, involving in-depth interviews with 500

market users as well as with management and members of the Council and the Mayor. The authors submitted the report to the Council and its findings have been cited (for example in the council's 2020 'commission brief' for the procurement process for the Queen's Market and Hamara Ghar Investment Strategy, then called the 'Capacity and Viability Study, mentioned in our introduction above).
<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf>

From the summary:
The research involved a survey of 500 market users (capturing a representative sample in terms of age, gender and ethnicity), two focus groups with selected user groups and around 10 interviews with key local actors, to contextualise the findings.
Queen's Market is particularly important to Asian and Black ethnic groups, migrants, people on low incomes and older people. Thirty-one percent of market users identify as Asian/Asian British (Indian), 25% Asian/Asian British (Pakistani/Bangladeshi) and 27% Black/Black British. The majority of market users were not born in the UK; 46% have lived in the UK more than 25 years. Sixty-nine percent are over 50 years old and 70% are women.
Queen's Market is a highly successful shopping destination of choice, specialising in quality and affordable fresh foods, clothing and textiles. The vast majority of market users do at least half of their food shopping at Queen's Market, with 21% doing all their food shopping at the market. It also drives footfall and spend in the wider town centre: 89% of users said Queen's Market was their main reason for visiting Green Street that day. Queen's Market is a social, welcoming and supportive community asset. Ninety-two percent of market users strongly agree or agree that it is a community hub. Queen's Market is more important to market users than other community facilities (e.g. libraries, parks) and other retail and food outlets.

F) The Market was listed as an Asset of Community Value in 2015.

G) The GLA report (PDU 1080 01) on the previous planning application for the Market (08/00894/FUL), linked the provision of affordable food to rent levels and specifically to black and ethnic minority businesses. The report stated at para 64:
Policy 3B.I of the London Plan requires that the spatial needs of small and medium sized enterprises (SMEs), and black and minority ethnic businesses be addressed... The Agency therefore welcomes the discussions between the applicant and market traders to agree rent levels... Rent levels should allow existing businesses to trade without proving unviable or requiring substantial costs to be passed onto the consumer. London's Food Strategy states that wide inequalities exist in terms of the

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			proportion of family spending on food, where food spending for high income households accounts for 6% of total spending compared with 26% for low income households... Affordability should also consider the service charges. As set out in the Economic Development Strategy, a major issue for SMEs is the availability of affordable premises.]		
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/018	Neighbou rhoods	N14 Green Street						Blank	No						Blank	3. The Plan cannot protect the market: the Plan is not effective or deliverable In the Main Changes to Neighbourhoods document it is claimed that ‘policies in the Local Plan continue to protect the market’. However we believe the Plan will not protect the market due to the omissions and inaccuracies above. It is therefore not effective or deliverable. The omission of mention of the market’s role or ignificance is not justified or based on credible evidence. A possible redevelopment of the market is not justified by policy. At recent consultations (for the Investment Strategy Study as mentioned above) the proposal to build housing on the site has been offered as a benefit which could outweigh the loss of the market. But the potential loss of the market cannot be weighed against any gains unless there is a correct recognition of its value.	A definition of what the Council means by “the market” or “Queen’s Market” is needed. The words could simply mean a collection of stalls either outside or inside, with new traders and under private management. The Plan should describe the market as: - A covered market - 166 pitches of a size as per existing traders’ licenses - 72 shops of a size as per existing leases - The existing number and size of kiosks - Affordable, low prices due to the current stall and shop rents and leases - The existing amount of storage space - A community space	The policy approach to Queen's Market, including its functional and capacity protection is justified by the Newham Retail and Leisure Study and the Newham Characterisation Study. However, it cannot deliver the changes you have requested as the operational arrangements for Queens Market, including sizes of pitches, rents and lease agreements, are not material planning considerations and will not require planning permission to change. The policy seeks to protect the principle of the market and the overall size of it, including storage arrangements, as set out through the thematic policy HS4. Further, Newham's Markets team do not consider that a covered market is necessarily better than an open one, with trade offs in both cases. All markets held in Newham under its franchise are licenced and operated in accordance with the provisions of the London Local Authorities Act 1990 (as amended). This legislation also includes strict criteria for setting pitch fees, which relates strictly to the costs of operating the market(s) and are agreed annually by the Council following statutory consultation. The council operates a number of markets and is therefore able to operate an economy of scale that allows for reduced operational cost per pitch, translating into lower pitch fees than what a private operator may be able to offer. Nevertheless, policy part HS4.3 requires that a markets management plan is agreed by the Council as part of the application, and the implementation section requires that a vacancy prevention strategy is included as part of the management plan and aligns with criteria set in policy HS2.6, including consideration of discounted rent. The shops framing the market, while operated alongside the market by the Council, are permanent shops and changes to these will be guided by policy the criteria in policy HS2. It would be disproportionate and ineffective for the policy to list all existing aspects of the market. The specific context of Queen's Market will be considered as and when a planning application is put forward, with policies across the plan working together to provide the framework for protecting and enhancing the market. The Council is satisfied that the plan is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/022	Neighbou rhoods	N14 Green Street						Blank	No						Blank	5. Locations for remedies N14 Green Street Neighbourhood Profile N14 Green Street Vision [...] Supporting documents should include: Newham Markets Strategy and Policy Review (as above at 1A) Leeds University Markets4People Study (as above at 1E) GLA Understanding London’s Markets (2017) Remedies summarised below (these appear in the above text with more supporting detail)	[5. Locations for remedies] A definition of what the Council means by “the market” or “Queen’s Market” is needed. The Plan should describe the market as: - A covered market - 166 pitches of a size as per existing traders’ licenses - 72 shops of a size as per existing leases - The existing number and size of kiosks - Affordable, low prices due to the current stall and shop rents and leases - The existing amount of storage space - A community space	The policy approach to Queen's Market is proportionate to the evidence base of the Local Plan and the role of the market as part of Green Street neighbourhood, and is considered to be effective. The further evidence you have suggested are noted. The policy cannot deliver the changes you have requested as the current operational arrangements for Queens Market, including sizes of pitches, rents and lease agreements, are not material planning considerations and will not require planning permission to change. The policy seeks to protect the principle of the market and the overall size of it, including storage arrangements, as set out through the thematic policy HS4. Further, Newham's Markets team do not consider that a covered market is necessarily better than an open one, with trade offs in both cases. All markets held in Newham under its franchise are licenced and operated in accordance with the provisions of the London Local Authorities Act 1990 (as amended). This legislation also includes strict criteria for setting pitch fees, which relates strictly to the costs of operating the market(s) and are agreed annually by the Council following statutory consultation. The council operates a number of markets and is therefore able to operate an economy of scale that allows for reduced operational cost per pitch, translating into lower pitch fees than what a private operator may be able to offer. Nevertheless, policy part HS4.3 requires that a markets management plan is agreed by the Council as part of the application, and the implementation section requires that a vacancy prevention strategy is included as part of the management plan and aligns with criteria set in policy HS2.6, including consideration of discounted rent. The shops framing the market, while operated alongside the market by the Council, are permanent shops and changes to these will be guided by policy the criteria in policy HS2. It would be disproportionate and ineffective for the policy to list all existing aspects of the market. The specific context of Queen's Market will be considered as and when a planning application is put forward, with policies across the plan working together to provide the framework for protecting and enhancing the market. The Council is satisfied that the plan is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/117	Neighbourhoods	N15 Forest Gate														[We welcome support for provision of step-free access at Wanstead Park station, particularly as this offers a short walking route to interchange with the Elizabeth line at Forest Gate. This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding] We note that there is no mention of development funding for step free access		A change to this policy approach has not been made. We 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 Report. The Council is satisfied that the plan remains sound without this change.
Reg19-E-013	Transport for London		Reg19-E-013/118	Neighbourhoods	N15 Forest Gate	N15.SA1 Lord Lister Health Centre													[Wanstead Park station, Woodford Road bus stands on the east of N15.SA1 will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to Local Plan Policy T1 to make specific reference to bus stands. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/058	Neighbourhoods	N15 Forest Gate	N15.SA1 Lord Lister Health Centre					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/059	Neighbourhoods	N15 Forest Gate	N15.SA1 Lord Lister Health Centre					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/060	Neighbourhoods	N15 Forest Gate	N15.SA2 Woodgrange Road West					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/061	Neighbourhoods	N15 Forest Gate	N15.SA2 Woodgrange Road West					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N15.SA2 Phasing and Implementation: ~~Phasing of the site should take account of the likely requirement for wastewater infrastructure upgrade, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.~~ which is included in the modification table.
Reg19-C-042	Parshotam Varu		Reg19-C-042/001	Neighbourhoods	N16 Manor Park and Little Ilford						Yes	No						No	Fails to comply with the duty to co-operate with community. fails to provide toilet facilities in Little Ilford Park.	Include and co-operate with the communities' to provide toilets in little Ilford Park and reopen the closed toilets elsewhere.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of delivering facilities, such as public toilets, in parks through Policy GWS1. However, the Local Plan cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments. The Council is satisfied that the plan remains sound without the proposed change.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/119	Neighbou rhoods	N16 Manor Park and Little Ilford														[We welcome support for provision of step free access at Woodgrange Park station. This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding.] We note that there is no mention of development funding for step free access		A change to this policy approach has not been made. We 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 Report. The Council is satisfied that the plan remains sound without this change.
Reg19-E-013	Transport for London		Reg19-E-013/038	Neighbou rhoods	N17 Gallions Reach														[We suggest that Beckton Riverside is included in the title for clarity.] We note that no change has been made in response to this point		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/039	Neighbou rhoods	N17 Gallions Reach														[We support the provision of a riverside pier which would enable river bus services to be extended to the area. The pier and initial operating costs will need to be fully funded through contributions from developments and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided.] We note that no change has been made in response to this point		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/040	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Any large redevelopment at Gallions Reach, with or without a DLR extension to Thamesmead, would likely result in Gallions Reach station requiring a secondary means of egress (and associated platform extensions). The north ends of the platforms are currently non-compliant. While this derogation is acceptable on the basis that trains usually do not arrive particularly full (because it is one stop before the end of the line), it may not remain so if demand increases. This may need to be addressed as part of the potential Thamesmead extension or as a consequence of proposals being brought forward for Gallions Reach. However, it will require further study and developer contributions will be required to fund and facilitate any works. Regardless of any safety issues, a development of sufficient size would likely lead us to request contributions towards platform extensions to spread out passengers, minimise dwell times and manage peak crowding.] We welcome changes that have been made to N17 and N17.SA1 to reflect this point		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/041	Neighbou rhoods	N17 Gallions Reach														[The second and third sentences of 4.9 should be amended for clarity: ‘The council, Greater London Authority, Transport for London, Homes England, St William, ABRDN, the Thamesmead Waterfront Joint Venture and the London Borough of Greenwich are proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside. The DLR would continue over the river to another new DRL station at Thamesmead Central in the London Borough of Greenwich.’] We welcome changes that have been made to N17 and N17.SA1 to reflect this point	although we note that references should be to the Royal Borough of Greenwich.	Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/042	Neighbou rhoods	N17 Gallions Reach														[We recommend that a potential bus, walking and cycling crossing of the Roding between Beckton and the River Road area in Barking & Dagenham is included. This was identified in the London Riverside Development Infrastructure Funding Study, is included in Figure 8 (page 37) of LBBD’s Local Plan (submission version) and in Table 6 and Figure 34 (both page 31) of the “Borough Wide Transport Policies: 2021-2037” in its transport evidence base. This should also be marked on your proposals map] We note that no change has been made in response to this point despite the Lower Roding crossing being included in the Newham Infrastructure Delivery Plan.	We recommend that this project is included in N17 and on the proposals map for consistency.	Comment noted. Modifications have been made the Local Plan to mention support of the Lower Roding Crossing (including in N17), however the Council considers that it is premature to include the crossing on the proposals map, given that the proposal is at a early stage of development and no specific route has been chosen.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/043	Neighbourhoods	N17 Gallions Reach														[Although there are no current proposals, we encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived. This (may) also affect the eastern edge of Beckton, East Ham South and East Ham neighbourhoods.] We note that no change has been made in response to this point.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/044	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[See comments regarding DLR in N1 which would apply to this site.] We welcome changes that have been made to N17 and N17.SA1 to reflect this point.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/045	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[There is no reference to the circumstances in which safeguarded land would be released, or the principle of its release. We welcome some clarity in the local plan on this.] We welcome clarification regarding the release of safeguarded land.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/046	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[The second paragraph of the Development Principles section states that ‘The development of this site should occur only once the outcome of the Beckton to Thamesmead DLR extension project is known and must reflect the agreed outcome.’ We support this statement in that it seeks to ensure development is linked to new infrastructure provision required to unlock the site and will require developer contributions as part of a wider funding package to support a new DLR station. However, TfL would also support flexibility in the way this is phrased to allow for discussions on limited deadweight development that could take place before a DLR extension was confirmed, as well as the potential sequencing of DLR approval processes and planning applications.] We note and support the updated wording which provides flexibility and greater certainty on phasing of development.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/047	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[The development principles should include a masterplan approach between land owners, the GLA, boroughs and TfL. It is also unclear if the major centre listed is the same as the district centre referred to elsewhere in the local plan.] We welcome clarification of the status of the district centre		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/048	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[The infrastructure requirements should require a joint stakeholder approach between landowners, infrastructure providers and authorities.] We welcome amended wording in the infrastructure requirements.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/006	Neighbou rhoods	N17 Gallions Reach			11.e											• N17: River Roding Crossing – It might be helpful to refer to the River Roding Crossing separate to the other crossings identified under 11e of N17 to reflect on the difference in scale (i.e., a river crossing vs. road crossings).		Comment noted. This comment has been subject to further discussion with London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change which is included in the modification table. N17 11.e: providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding (including the Lower Roding Crossing) to reduce severance, and to improve connectivity to Beckton, the wider network of neighbourhoods and to neighbouring boroughs;
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/007	Neighbou rhoods	N17 Gallions Reach			11											• Point 11: It is noted that the River Roding crossing is proposed in order to reduce severance and improve connectivity to a wider network of neighbourhoods. It could be beneficial to include more specific references to Thames Road and Barking Riverside Developments as nearby neighbourhoods to demonstrate the scale of development, and connectivity between developments, either side of the crossing.		Comment noted. This comment has been subject to further discussion with London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change which is included in the modification table. providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding (including the Lower Roding Crossing) to reduce severance, and to improve connectivity to Beckton, the wider network of neighbourhoods and to neighbouring boroughs;
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/008	Neighbou rhoods	N17 Gallions Reach			11											[• Point 11: It is noted that the River Roding crossing is proposed in order to reduce severance and improve connectivity to a wider network of neighbourhoods. It could be beneficial to include more specific references to Thames Road and Barking Riverside Developments as nearby neighbourhoods to demonstrate the scale of development, and connectivity between developments, either side of the crossing.] The crossing also has potential to benefit LB Newham through the provision of a local heat network via the Beckton Sewage Works – the plan should include a commitment for further joint working to explore this.		Comment noted. This comment has been subject to further discussion with London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change which is included in the modification table. providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding (including the Lower Roding Crossing) to reduce severance, and to improve connectivity to Beckton, the wider network of neighbourhoods and to neighbouring boroughs;

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/009	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside														• p.593 “Development principles ‘release of the land safeguarded for a river crossing ~~crossing~~ (by the Secretary of State, following recommendation by Transport for London and the Mayor of London).”	Typo is noted. This has been rectified by making your wording change: release of the land safeguarded for a river crossing ~~crossing~~ (by the Secretary of State, following recommendation by Transport for London and the Mayor of London). [...] which is included in the modification table.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/014	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													We would also request to be kept updated on development proposals for the site allocations that border Barking and Dagenham ([Former East Ham Gasworks] and Gallions Reach) so that we can work together to address any cumulative impacts of development across the borough boundary.		Comment noted and this has been factored into our ongoing Duty to Cooperate processes.
Reg19-E-033	Thames Water		Reg19-E-033/030	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					Blank	No						Blank	[Land South Of Gallions Reach, Armada Way, Beckton, London E6 7FB] [Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/031	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					Blank	No						Blank	[Land South Of Gallions Reach, Armada Way, Beckton, London E6 7FB] [Waste Response] The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/032	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					Blank	No						Blank	[Land South Of Gallions Reach, Armada Way, Beckton, London E6 7FB] Additional Comments Also see objection to Policy N17 Gallions Reach in relation to odour etc	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted.

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

requirements of P6 6.2 - Water Supply and Wastewater Infrastructure and the London Plan to determine what odour mitigation is feasible.

Despite making consultation responses that an appropriate Odour Impact Assessment should be undertaken for some years, Thames Water only received a draft OIA from a developer in June 2024. However, this OIA was not completed using our approach and methodologies and therefore is not accepted. Also to date no analysis of this OIA has been provided by Newham Council. Therefore points 1 & 2 of the current Local Plan Inspectors Report paragraph 134 have not been complied with.

Also no clarification has been provided to date as to what mitigation is available and who is responsible for this in accordance with point 3 of the current Local Plan Inspectors Report paragraph 134.

As previously mentioned in consultation responses and at RDBROAPF meetings, given the past major odour mitigation works which have already been implemented, future mitigation options at Beckton STW are limited or may not even be feasible. The most odourous parts of the STW process are already covered and odour controlled i.e. the preliminary screening, primary treatment and sludge treatment is already covered and odour controlled.

Mitigation options are therefore very limited at Beckton. The majority of remaining uncontrolled emissions are from the secondary treatment plant which are very large surface area tanks, with low area odour emission rates. Secondary treatment tanks are generally not covered in the water industry due to the odour being so weak that there is no need to control it. Therefore, even if it was affordable and deliverable any reduction in odours is likely to be marginal and not affect the ability to bring forward development within the vicinity of Beckton STW. A technical odour study would be required to demonstrate this and determine whether there are any further odour mitigation options.

In the likely scenario that sufficient mitigation cannot be implemented at the STW to enable the proposed scale of development then a much larger buffer will be required in line with odour contours and which may limit any odour sensitive development. Guidance on odour sensitive developments and less sensitive developments which may be acceptable in an odour buffer can be found in the IAQM document ‘guidance on the assessment of odour for planning’ <https://iaqm.co.uk/guidance/>

For example, it should not be assumed that public open space will be acceptable in an odour buffer, depending on the strength of the odour contours. The proposed allocation should demonstrate how this guidance has been considered in particular we refer the LPA to the IAQM table 2 receptor sensitivity to odours as copied below:

[Table 2: Receptor sensitivity to dours]

The local authority and/or developer should continue to liaise with Thames Water in relation to an appropriate odour

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			impact assessment and odour mitigation options study as part of the promotion of the site and at the earliest stage in advance of any allocation or future planning application submission/s. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers. As currently proposed those new occupiers would be located in closer proximity to a sewage treatment works and Thames Water’s current position in the absence of any further evidence is that the proposed allocation and development would be unacceptable.		
Reg19-E-033	Thames Water		Reg19-E-033/139	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					Blank	No						Blank	The Thames Gateway Bridge Safeguarding Direction (as shown on the adopted Local Plan Policies Map) was made on 4th May 2001 and came into force on 8th May 2001. It has therefore blighted operational land on the western side of Beckton STW for over 20 years and it is understood that there are still no plans for such a bridge. It is understood that TfL are focusing on the Silvertown Tunnel as the top priority road scheme, which is now under construction at the other end of the Royal Docks, and it is planned to open in 2025. We consider that to continue the ongoing retention of the safeguarding in the Local Plan which affects the western side of Beckton STW, evidence to justify the ongoing safeguarding must be provided. To date, we have not seen such evidence in the Local Plan Review consultation document and we would be grateful for any update on progress/new evidence. Unless there are any firm plans/evidence for a new strategic river crossing it is considered that the Safeguarding Direction and designation on the Local Plan policies map should be removed. Policy N17.SA1 sates: “Development proposals within the part of the site safeguarded for the Thames Gateway Bridge must be referred to Transport for London and the Mayor of London for confirmation it will not preclude the delivery of a road crossing, until the safeguarding is removed as directed by the Secretary of State, following recommendation by Transport for London and the Mayor of London” N17 states “10. supporting the removal of the Thames Gateway Bridge Safeguarding (by the Secretary of State, following recommendation by Transport for London and the Mayor of London)”	Remove Thames Gateway Bridge Safeguarding Direction from Policies Map and Beckton STW.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. We did not consider this change appropriate as responsibility for safeguarding of the land for the Thames Gateway Bridge rests with the Secretary of State on the recommendation of Transport for London and Mayor of London. Newham is not the determining authority and cannot remove the safeguarding. Until it is removed, this constraint should be shown on the policies map so that all interested parties are aware of this constraint.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/048	Neighbourhoods	N17 Gallions Reach						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] Characterisation Study – Neighbourhood Design Principles Given that St William has already submitted a planning application for the first phase of Beckton Riverside, the recommendation seems to have been overtaken by events and should be adjusted. As per comments previously, any SPDs for key sites should only be taken forward where there is no current planning consent in place.		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 positively prepared. Newham Characterisation Study depicts a point in time evidence base which has informed the Local Plan's spatial strategy and design policies and provides guidance on how the policies should be implemented. The Council acknowledges that Beckton Riverside has been assessed and submitted under the adopted Local Plan. However, future developments are expected to meet the Local Plan's objectives and site allocations design requirements which have been informed by a more detailed and comprehensive analysis and understanding of the character of the Borough. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/001	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Please refer to the submitted letter of representations dated 20 September 2024, prepared by Montagu Evans LLP on behalf of abrdn.		Comment noted. The letter has been processed.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/003	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	In the interest of ensuring the Local Plan realises the significant potential presented by Gallions Reach and Beckton Riverside, abrdn wishes to highlight a number of areas where the Regulation 19 Draft Submission Local Plan policy as drafted should be amended to provide the appropriate policy framework for development and investment to come forward. In particular, abrdn wants to reach agreement with the London Borough of Newham ("LBN") about how appropriate policy wording can be included in the plan for the asset management of the Gallions Reach Shopping Park ("GRSP") before significant development can take place.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/005	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Context Gallions Reach is identified in the adopted Local Plan as part of a wider site allocation for a significant new urban development, which includes a new Major Town Centre around the existing Shopping Park (Strategic Site S01). The adopted Local Plan states (para 6.64) that any changes in floorspace should be comprehensively masterplanned as part of wider changes to retail, residential and other employment, transport and utilities development in the area. In accordance with Policy S01 the new neighbourhood should include new Strategic Infrastructure including a new station and wider transport hub. That is entirely dependent on the delivery of the DLR extension from the existing Gallions Reach station to Beckton Riverside and thereafter to Thamesmead via a tunnel crossing. abrdn is working with St William, TfL and LBN to prepare the Strategic Business Case for this extension of the DLR to Beckton Riverside and Thamesmead. A critical element of this case is to demonstrate that the planning framework is in place to enable development to come forward at the Site at the appropriate time to create the funding to deliver new infrastructure and ensure the community is there to support it. This is dual purpose because both obligations resulting from development support the funding case, as does the revenue stream resulting from development and the DLR. One of the key principles is that all developments in some way combine to support the business case for Central Government Funding.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/006	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No							Yes	It is also important that the new Local Plan enables the existing GRSP to function, adapt and thrive whilst also providing an appropriate framework for new development, infrastructure and investment to come forward in a timely manner. The ongoing successful operation of the park supporting existing retailers, attracting new ones and also creating new stores and restaurants is essential to providing a platform for the moment when a new town centre can be delivered. Retailers and the general market will have more confidence committing to a new town centre where there is an existing established centre.	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 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, until such time as masterplanning for the strategic sites is at a sufficiently advanced stage and the development trigger point set out in the site allocations are met to enable the transformation into a town centre, before intensifying and diversifying the mix of uses on the overall site. 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 the following wording change to policy HS1.2a, HS1.2 implementation section, which are included in the modification table. HS1.2a 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: a. ~~Not supporting incremental change to the composition of~~Managing the existing out of-centre Gallions Reach Shopping Park as an out-of-centre retail park. HS1.2 Implementation: In the interim, while key masterplanning decisions are outstandingand particularly until commitment to the new DLR station is ~~known~~secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met, changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination. The Council has also drafted the following modification, which will be presented to the Inspector for their consideration, to policy HS3.1: HS3.1 implementation: Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/007	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	ASSET MANAGEMENT Draft Policy HS1 requires development for the provision of main town centre uses within N17.SA1 Beckton Riverside to be accompanied by masterplanning of the new town centre. Whilst abrdn are supportive of the new infrastructure intervention of an extended DLR; it must be acknowledged that uncertainty always surrounds the delivery of such major interventions, this also applies to the potential delivery of the DLR extension. The reality is that such transport infrastructure may never come forward, it is impractical to require all new development within the N17.SA1 site allocation to be accompanied and informed by masterplanning of the new town centre when the triggers (set out later in this letter) do not allow for the delivery of the new town centre until the DLR construction contract has been let or funding is secured for a similarly transformative public transport intervention. There are examples where Government funding for major infrastructure projects has been removed despite having significant costs already committed, the timing of confidence in delivery remains an ongoing risk. There are clear inconsistencies with this draft policy and the triggers for the town centre delivery in N17.SA1, we therefore consider that this part of Draft Policy is unsound.	It is essential to abrdn that the proposed new Local Plan incorporates a policy framework which is flexible and recognises the critical importance of maintaining the ongoing asset management of Gallions Reach Shopping Park, to secure its commercial viability and function until comprehensive development can come forward in an appropriate manner. There should not be an ‘in principle’ objection in policy to any asset management which does not prejudice the delivery of the new Town Centre.	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 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, until such time as masterplanning for the strategic sites is at a sufficiently advanced stage and the development trigger point set out in the site allocations are met to enable the transformation into a town centre, before intensifying and diversifying the mix of uses on the overall site. 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 the following wording change to policy HS1.2a, HS1.2 implementation section, which are included in the modification table: HS1.2a 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: a. ~~Not supporting incremental change to the composition of~~Managing the existing out of centre Gallions Reach Shopping Park as an out-of-centre retail park. HS1.2 Implementation: In the interim, while key masterplanning decisions are outstandingand particularly until commitment to the new DLR station is ~~known~~secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met, changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination. The Council has also drafted the following modification, which will be presented to the Inspector for their consideration, to policy HS3.1: HS3.1 implementation: Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/008	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													No	No																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					development opportunity of the site should be optimised in line with Local Plan Policy D3, unless directed otherwise by policies in this Plan. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/009	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	REDEVELOPMENT OF BECKTON RIVERSIDE Key principles in the Local Plan 1) 15-minute neighbourhood abrdn continues to support the Council's proposed spatial strategy (BFN1), underpinned by the 15-minute neighbourhood concept, to provide an accessible and inclusive neighbourhood for all residents and to distribute the benefits of growth. This is consistent with the way GRSP currently trades – serving local residents as well as the strategic shopping role it also plays.		Comment noted.

Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/010	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	2) Consistent approach to masterplanning – not being applied abrdn notes the requirements set out within the proposed spatial strategy (BFN2) for major applications and applications on site allocations to undertake co-designed site masterplanning, through engagement with different stakeholders. This supports the aspirations of the adopted Newham Local Plan, in particular Spatial Policy S1 for the comprehensive development and masterplanning of strategic sites. We are aware of pre-application discussions for the proposed redevelopment of approximately 12 hectares of land comprising the eastern portion of the former Beckton Gasworks for substantial mixed-use development including 2,800 dwellings and 8,000 sqm of non-residential floorspace. A response to the EIA scoping request (ref. 23/02472/SCOPE) was issued on 9 April 2024, we understand that the submission of a planning application has followed (yet to be validated). abrdn would like to put it on record that they were not involved with the masterplanning of or consulted upon as part of the emerging proposals set out above. We consider that this is contrary to Policy S1 of the Newham Local Plan and draft policy BFN2 of the Draft Submission Local Plan given that abrdn are considered to be a major landowner of the Strategic Site N17.SA1 along with the applicant St William. In contrast, this was one of the principal reasons for the refusal of application reference 23/00319/FUL because LBN considered the proposals in that case failed to demonstrate that the provision of new floorspace would not prejudice the aspirations of the site allocation in part due to a lack of justification of appropriate masterplanning in the context of the wider redevelopment aspirations of the strategic site. In that case, the proposals were considered to fail in meeting the expectations of adopted Policy S1 (the aspirations of which are retained in draft Policy BFN2) and Policy INF5 because they did not appropriately demonstrate through coordination with private and stakeholders and comprehensive development design that the proposals had been considered as part of the indicative wider comprehensive masterplan. In light of the above, abrdn questions whether the application of adopted Policy S1 and draft Policy BFN2 is being applied consistently by LBN and if not whether it should continue to be part of policy going forward. If this policy is applied, then LBN should not have engaged in the pre-application process because there would have been an in-principle conflict with this requirement for joint masterplanning which has not been applied.		Comment noted. This comment primarily relates to a live planning application which has not yet been determined. We would welcome ABRDN's comments on this application, which at the time of writing (March 2025), have not yet been received.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/011	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	The proposed core policies in respect of design, tall buildings, high street and community uses, night-time economy, open space and connectivity are all supported and would be applied at Gallions Reach / Beckton Riverside	We propose that the N17.SA1 Beckton Riverside site allocation explicitly references that the location of the new proposed future DLR station and track alignment has now been	This wording change is not supported. We did not consider this change to be necessary as LB Newham considers that the proposed approach in the Plan balances making use of available evidence while ensuring sufficient flexibility to enable future delivery. While a single preferred

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			(N17.SA1). abrdn proposes that these core policies provide a sufficient and appropriate framework to ensure that LBN's objectives for the development of Beckton Riverside are met. This is because there has been a material change in circumstances compared with previous versions of the plan. That change is the future location of Beckton Riverside DLR station is now essentially fixed with a single preferred option agreed upon. This is because the alignment of the DLR, where the crossing under the Thames will be located and the geometry of the tracks is now essentially fixed through the engineering feasibility work that has been undertaken by the jointly commissioned team. With this fix on the station location and track alignment there can be no uncertainty that development on GRSP would prejudice the delivery of that key component.	fixed within the 'Development Principles' section at pages 593-596.	option has been agreed on, there is still feasibility and detailed design work to be undertaken which is likely to influence the land required. Therefore until the DLR construction contract is confirmed, explicitly referencing an exact site for the station is considered premature. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/012	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	The future location of the station makes it clear that the southern end of GRSP closest to Armada Way will be closest to the new transport node if delivered. It is helpful that Armada Way also provides bus access to aid public transport accessibility and a future interchange.		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/013	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	abrdn supports the Council's assessment of the scale and type of centre designation in the Town Centres hierarchy. The Site has been identified as a location for a new Town Centre (in line with the London Plan Policy SD7 (2021)).		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/014	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	abrdn is also supportive of the inclusion of Gallions Reach as a strategic Neighbourhood Policy.		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/015	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	abrdn notes that the Regulation 19 Plan and its Policies Map provides further clarity on the height parameters at the various parts of the Beckton Riverside site and welcomes that at the northern part of the site (including Gallions Reach Shopping Park) building heights should range between 21-32m (7-10 storeys) with taller elements up to 50m (16 storeys) in locations near the new town centre and DLR station now its location is known.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/016a	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Further clarification should be provided within the draft policy in respect of potential quantum of development (in terms of unit numbers), retail floorspace, housing mix... It is unclear how these Regulation 19 Neighbourhood Policies will be used to maximise the development potential of the site without delaying delivery through layers of policy, masterplanning and phasing.		A response to this comment was provided in the Regulation 18 Local Plan Consultation report. The Council's response has not changed. The neighbourhood policy, including its vision, sets out the overall approach to how the neighbourhood will change and develop up to 2038. This includes design principles for how sites should be optimised for housing as well as requirements for different types of use. The neighbourhood policy is supported by the site allocation for N17.SA1 which provides further detail on the requirements for different phases of development on the site. The borough-wide housing mix policies will apply to the site. The Council is satisfied that the plan is sound without further clarifications.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/016b	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Further clarification should be provided within the draft policy in respect of [potential quantum of development (in terms of unit numbers), retail floorspace, housing mix] and the more detailed distribution of land uses most notably the inconsistencies between the Draft Submission Local Plan and OAPF relating to the provision of green space and industrial buffering at GRSP. [It is unclear how these Regulation 19 Neighbourhood Policies will be used to maximise the development potential of the site without delaying delivery through layers of policy, masterplanning and phasing.]		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is aligned with the guidance set out in the OAPF. While the site allocation map is indicative, the broad location of the industrial buffering and green space are aligned with the figure 4.49 on page 197 which is the detailed 'place' vision for Beckton Riverside. The guidance regarding the provision of industrial buffering and green space outlined in the OAPF (points 3 and 5, page 197) are also aligned with the site allocation principals on these points. We acknowledge some further detail is provided in the site allocation, as is appropriate for a more detailed policy document. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/017	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Policy N17: Gallions Reach - Site Allocation N17.SA1 (Beckton Riverside) The policy as currently drafted identifies a broad vision for the site, with 21 separate vision principles. There are two indicative development maps and three pages of policy which set out the Council's thoughts on development principles, design principles, infrastructure requirements and phasing for the site. Subject to viability (please also refer to representations on Green Space and Industrial Buffering at the end of this letter), abrdn supports the overall vision to transform Gallions Reach into a new neighbourhood community with a new DLR line and station at the heart of the Town Centre, homes, employment, public transport, green space, community and cultural facilities. We do not comment upon all 21 of the vision principles, however abrdn supports the principle of integrating and protecting heritage assets, improving Armada Way, enhancing walking, cycling and public transport and public access to green and blue spaces. The vision as identified should be flexible to enable the development to come forward through appropriate masterplanning following detailed assessment of the site opportunities and constraints.		Comment noted. It is considered that the allocation is suitably flexible and considers the range of opportunities and constraints relevant to this site over the Plan period, to ensure deliverability.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/018	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside												No	No																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/019	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	3) DLR project trigger If and when the DLR construction contract is let (as is currently drafted) then the presumption against significant development and redesign would fall away.	abrdn request further clarification as to what constitutes a “similarly transformative (as confirmed by Transport for London) public transport intervention”, including what this might look like, any associated timescales for delivery and why this has now been included within the draft policy.	Comment noted. The Council, TfL and Homes England are committed to pursuing the DLR extension. However it was acknowledged at the point of drafting the Regulation 19 Plan, that as the project was developed, other options may need to be considered to ensure best value use of public money. The policy was therefore changed to reflect this and ensure flexibility to enable deliverability. Following the publication of the Regulation 19 Local Plan, TfL published the result of their consultation on the Beckton Riverside DLR extension which confirmed the DLR extension was their preferred option. This option is the only transport option now being actively pursued. To reflect this progress in the project, this flexibility is considered to no longer be required and therefore the Council has drafted the following modification, which will be presented to the Inspector for their consideration: : ~~or a similarly transformative (as confirmed by Transport for London) public transport intervention~~

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/020	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	4) Criteria for significant development if DLR does not progress What has become clear with the DLR extension project is that there is no firm timetable and no certainty about funding to its completion.	In these circumstances, abrdn requests that criteria are agreed and set in policy which would trigger discussions for significant development of GRSP, but which would be of a smaller scale than the ‘transformative’ scale sought to be captured by the current drafting and at appropriate locations. This would be a ‘medium term’ position. These criteria would cover: - the construction contract not being let; - Funding being withdrawn/ being insufficient to allow the DLR feasibility to progress; - Withdrawal of political support from the GLA/TfL or LBN; - The DLR business case showing that the DLR scheme is unfundable; - Other criteria to be defined. It is essential that any future Local Plan policy enables some development to come forward at the northern part of the site in advance of a DLR construction contract being let or funding is secured for a similarly transformative public transport intervention. The DLR Business Case is strengthened substantially by the ability for early delivery on the site(s) of all major landowners before the DLR proceeds. abrdn is aware that having a supportive planning policy and outline planning permission in place will demonstrate commitment of the Council and developers as discussions relating to the DLR extension continue to progress. It is essential to the current business case that housing is delivered and functional at the point the DLR opens – the prevention of developing coming forward at the northern part of the strategic site until the DLR construction contract is let poses a significant risk to the business case. The policy should therefore be amended to reflect joint working and allow for an early phase of delivery before any DLR construction contract is let or funding is secured for a similarly transformative public transport intervention. The development of this site should be seen in phases, to maximise the chance of delivery, viability of appropriate infrastructure and funding support. This would comprise an ‘early phase’ delivery which is not predicated on a DLR construction contract being let, and then a broader masterplan which is likely to split across multiple phases but enables development before the DLR construction is complete, and final phases once the infrastructure is in place.	A change to this policy approach has not been made. We did not consider this change to be necessary 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. It is considered there will be sufficient time for phases of development to occur during the works to build out the DLR and enable the development of a sense of place and activation, especially if a masterplan, suitably conditioned to acknowledge the range of potential transport outcomes and related development options for the site, is pursued by both landowners in advance. 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. It is also considered that the letting of the DLR construction contract remains the most appropriate trigger for the more transformational stage of development. This trigger has been accepted in other similar transport-led redevelopments, including the Old Kent Road Area Action Plan. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/021	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Height and Design Principles abrdn is supportive of the Gallions Reach Tall Building Zone (Draft Policy D4), including that Gallions Reach Shopping Park and the parcel of land to its southeast has been designated as being able to accommodate maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys). [[Images inserted - Figure 1: GRSP Tall Building Zone (Up to 50m) and Figure 2: GRSP Tall Building Zone (Prevailing heights of 21m-32m)]]		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/022	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	As currently drafted, the proposed design principles set out a range of indicative building heights which are dependent upon the DLR construction being let or until a similarly transformative public transport intervention has confirmed funding. Whilst abrdn is supportive of the Tall Building Zone designation, as set out above, the trigger for allowing development of this scale cannot be predicated upon the DLR construction being let or until a similarly transformative public transport intervention has confirmed funding. Should there be any delays on the DLR decision making process and therefore the construction contract not being let for any reason (or other transport intervention) the policy as currently drafted does not allow for any phases of development to proceed at the northern part of the site and in such an instance no range of indicative building heights are applied.	abrdn consider that there is the opportunity to identify a suitable area for early ‘significant’ but not ‘transformative’ development at a suitable location which would contribute towards the funding and appetite for the DLR extension project. This ‘suitable area’ (likely to be near to the proposed town centre / DLR station) would allow some development of increased density. abrdn would like to discuss with LBN how this could be defined in plan form.	A change to this policy approach has not been made. We did not consider this change to be necessary 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. It is considered there will be sufficient time for phases of development to occur during the works to build out the DLR and enable the development of a sense of place and activation, especially if a masterplan, suitably conditioned to acknowledge the range of potential transport outcomes and related development options for the site, is pursued by both landowners in advance. 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. It is also considered that the letting of the DLR construction contract remains the most appropriate trigger for the more transformational stage of development. This trigger has been accepted in other similar transport-led redevelopments, including the Old Kent Road Area Action Plan. 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) and as such would not be a suitable location for tall buildings until transport improvements are secured. TfL are in agreement on this point and the Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/023	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	The proposed vision for N17 includes a number of design principles to encourage improved connectivity between sites, improved cycling and walking and active access to green space and the River Thames.	abrdn supports these principles in the vision, to be developed through appropriate masterplanning and design guidance but this should be clarified as to only be required with significant or transformative development. In particular, improvements to Armada Way are critical to the success of the proposed new community. abrdn wish to reiterate these improvements to Armada Way should not restrict the continued function of the existing Shopping Park.	A change to this policy approach has not been made. We did not consider this change to be necessary as it is considered clear that some of the design principals cannot be delivered until transformative development occurs. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/024	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	The policy identifies a requirement for a new community development to provide bicycle parking and e-bike charging as well as improvements to bus services. Similarly, we would support the principle of reducing car parking across the site in combination with these other sustainable public transport initiatives.	However, any such requirements should be appropriately phased for the masterplan area as a whole, to ensure the continued and co-existing operation of GRSP (an assumption of the DLR business case) which given its wider catchment area when compared to other nearby town centres will continue in part to be used by car borne customers as it does not have the highly localised catchments of other new town, district and local centres.	Comment noted. The Transport policies within the Draft Local Plan are in line with the London Plan 2021, with contributions towards transport improvements sought as per the scale of the development. The exact contributions towards transport improvements would be determined at application stage. In addition, the site allocation wording is clear regarding which requirements relate to development in advance of the letting of the DLR contract and which relate to after its letting. It is not clear what you are referring to in relation to 'a new community development'. The site allocation requirement to increase accessibility by public transport and walking and cycle routes explicitly relate to the design of the new town centre which can only be delivered after the letting of the DLR contract and as such parking standards should reflect the change in nature of this location from an inaccessible out of town centre retail park to an accessible town centre. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/025	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	New Town Centre The development of a new Town Centre – to meet District level as defined in the London Plan is important and should be carefully planned subject to demand at the appropriate time. abrdn supports the District level town centre designation, which subject to demand could expand to a Major centre designation in the future and notes that this designation suggests that emerging policy recognises the risk of no DLR (or a similarly transformative public transport intervention) coming forward.	As above, this should therefore be reflected in policy to allow the ongoing unhindered asset management of GRSP in such an instance that the public transport infrastructure is not delivered.	Support noted. Please note that the demand for a future Town Centre has been assessed with the growth associated with delivery of the DLR extension and is considered likely to require a town centre of a district scale only. As is clear in the High Street policies and site allocation, no Town Centre of any scale is suitable in this location until the DLR is delivered.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/026	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	The new Town Centre should encourage a mix of uses, to meet local catchment needs for retail, leisure, services and community uses. Beckton Riverside is currently identified as a ‘Future Major Town Centre’ in the London Plan Town Centre Network Table A1.1. This reflects that Gallions Reach Shopping Park operates as a strategic shopping destination overlapping the catchment areas of both district and local centres in the Borough, as reflected in the Policy. The Shopping Park retains that unique ability to serve other Newham communities. The London Plan should be the appropriate way of changing the designation of centres in the town centre hierarchy, not the Local Plan which should be consistent with it.		A change to this policy approach has not been made. We did not consider this change to be necessary as while it is acknowledged that policy SD8 in the London Plan preserves the ability to classify town centres of a major scale or above, policy SD7 in the London Plan requires Development Plan documents to assess need for main town centre uses and set out policies, boundaries and site allocations for future potential town centres to accommodate identified deficiencies in capacity (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1). Having undertaken this assessment in the Retail and Leisure Study to ensure the Plan is positively prepared, the Council consider that the demand for a future town centre at Gallions Reach is likely to require a town centre of a district scale only, and we will bring our evidence into the future London Plan review. Irrespective of the above, the Local Plan still retains the possibility of a major scale town centre being delivered here and no representations from the GLA have been received regarding a lack of conformity on this point. The Council is satisfied that the plan is/remains sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/027	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	abrdn would like further clarity on the exact location of the proposed new town centre. When considering the maps found within both the Draft Submission Local Plan and the Royal Docks and Beckton Riverside OAPF, due to inconsistencies across both documents it is currently unclear as to the proposed location of the new town centre.	For the avoidance of doubt, the new town centre should be appropriately positioned for the new public transport infrastructure. This should be in the southern part of GRSP closest to Armada Way as is indicated on figures 1.23 and 2.29 of the OAPF – the indicative location shown on Figure 3 below (Newham Draft Submission Local Plan Interactive Policies Map) and at Figure 4 below should be repositioned to the northeast on abrdn owned land to ensure the appropriate delivery of the town centre. [Image inserted - Figure 3: Indicative location of new town centre (purple dot) in Interactive Policies Map of Draft Submission Local Plan]	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. 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. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/028	Neighbourhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	As set out above, the delivery of the New Town should recognise the critical importance of maintaining the ongoing asset management of Gallions Reach Shopping Park, to secure its commercial viability and function until comprehensive development comes forward in an appropriate manner.	Given the realities and timescales associated with bringing forward large scale transformative development such as this there should not be an ‘in principle’ objection in policy to asset management which does not prejudice the delivery of the new Town Centre.	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 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, until such time as masterplanning for the strategic sites is at a sufficiently advanced stage and the development trigger point set out in the site allocations are met to enable the transformation into a town centre, before intensifying and diversifying the mix of uses on the overall site. 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 the following wording change to policy HS1.2a, HS1.2 implementation section, which are included in the modification table. HS1.2a 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: a. ~~Not supporting incremental change to the composition of~~Managing the existing out of centre Gallions Reach Shopping Park as an out-of-centre retail park. HS1.2 Implementation: In the interim, while key masterplanning decisions are outstanding and particularly until commitment to the new DLR station is ~~known~~secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met, changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination. The Council has also drafted the following modification to policy HS3.1, which will be presented to the Inspector for their consideration: HS3.1 implementation: Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/029	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	Green Space [and Industrial Buffering] abrdn supports the principle of providing opportunities for green space [and industrial buffering], as shown at Figure 4 below. However, abrdn consider that the extent of the proposed opportunity for green space [and industrial] is too large, most notably at GRSP. abrdn notes this area encompasses a significant portion of the Tall Building Zone (maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys)) and that the extent of green space [and industrial buffering] currently proposed would severely impact the quantum of development at the strategic development. This development is key to funding the DLR extension. [Image inserted - Figure 4: N17.SA1 Beckton Riverside indicative proposals map]	In light of this, abrdn proposes that the extent of the opportunity for [industrial buffering] and green space is reduced – especially given that any plots that come forward will each be required to meet their own environmental and biodiversity net gain requirements. An area of land for the purposes of [industrial buffering] and green space to the extent currently proposed within the Draft Submission Local Plan would have a major impact on housing numbers, result in a severely limited development footprint and a potentially unviable masterplanned scheme at GRSP – thus potentially compromising the DLR business case. The extent and scale of opportunity for green space and [industrial buffering] should be more consistent with that proposed within the adopted Royal Docks and Beckton Riverside OAPF (Figure 2.29 of the OAPF), this is shown below at Figure 5. [Image inserted - Figure 5: Strategic Vision - Royal Docks and Beckton Riverside Beckton Riverside OAPF]	A change to this policy approach has not been made. 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. The quantity of open space is informed by the Newham Green and Water Infrastructure Strategy. 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 reference 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 remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/030	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	[Green Space and] Industrial Buffering abrdn supports the principle of providing opportunities for [green space] and industrial buffering, as shown at Figure 4 below. However, abrdn consider that the extent of the proposed opportunity for [green space] and industrial is too large, most notably at GRSP. abrdn notes this area encompasses a significant portion of the Tall Building Zone (maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys)) and that the extent of [green space] and industrial buffering currently proposed would severely impact the quantum of development at the strategic development. This development is key to funding the DLR extension. [Image inserted - Figure 4: N17.SA1 Beckton Riverside indicative proposals map]	In light of this, abrdn proposes that the extent of the opportunity for industrial buffering and [green space] is reduced – especially given that any plots that come forward will each be required to meet their own environmental and biodiversity net gain requirements. An area of land for the purposes of industrial buffering and [green space] to the extent currently proposed within the Draft Submission Local Plan would have a major impact on housing numbers, result in a severely limited development footprint and a potentially unviable masterplanned scheme at GRSP – thus potentially compromising the DLR business case. The extent and scale of opportunity for [green space] and industrial buffering should be more consistent with that proposed within the adopted Royal Docks and Beckton Riverside OAPF (Figure 2.29 of the OAPF), this is shown below at Figure 5. [Image inserted - Figure 5: Strategic Vision - Royal Docks and Beckton Riverside Beckton Riverside OAPF]	A change to this policy approach has not been made. 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. The level of industrial buffering should be delivered through comprehensive masterplanning and will be assessed through the development management process. 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 reference 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 remains sound without the proposed changes.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/031	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside					No	No						Yes	SUMMARY abrdn supports Neighbourhood Policy N17 and the inclusion of Site Allocation N17.SA1 within the Regulation 19 consultation document. As set out within these representations, there are a number of errors and further clarification required in the draft policy as currently prepared. In particular, the proposed approach to the phasing of development and the reliance upon the outcome of the DLR decision making process is not an appropriate or viable approach to the development of the strategic site.		Comment noted.

Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/032	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside						No	No						Yes	It is also essential that emerging planning policy more explicitly supports the asset management of the existing Gallions Reach Shopping Park and provides a positive framework for its successful management so that it can continue to serve its important role to residents in Newham.	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 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, until such time as masterplanning for the strategic sites is at a sufficiently advanced stage and the development trigger point set out in the site allocations are met to enable the transformation into a town centre, before intensifying and diversifying the mix of uses on the overall site. 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 the following wording change to policy HS1.2a, HS1.2 implementation section, which are included in the modification table. HS1.2a 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: a. ~~Not supporting incremental change to the composition of~~Managing the existing out of-centre Gallions Reach Shopping Park as an out-of-centre retail park. HS1.2 Implementation: In the interim, while key masterplanning decisions are outstandingand particularly until commitment to the new DLR station is ~~known~~secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met, changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination. The Council has also drafted the following modification to policy HS3.1, which will be presented to the Inspector for their consideration: HS3.1 implementation: Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. 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: • 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 • Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/130	Neighbou rhoods	N17 Gallions Reach														16 Neighbourhood N17 Gallions Reach 16.1 St William continues to support LBN (and the GLA) in seeking to transform Gallions Reach into a new neighbourhood. 16.2 St William actively supports the delivery of an extended DLR line and new station in achieving this but welcomes the acknowledgment in the Regulation 19 draft that similar transformative (as confirmed by Transport for London) public transport intervention measures could also assist or achieve this. This revised wording helps to make clear that the DLR line extension and new station is the preferred policy approach; however, in the event the DLR improvements do not come forward (or do not come forward for some time), the regeneration and development of this part of London should not be precluded.	Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments Introductory text Gallions Reach will be transformed into a new neighbourhood through phased delivery, supported by transformative transport measures and local infrastructure improvements which could include the proposed DLR line extension and new station. ~~through the delivery of an extended DLR line and new DLR station at N1-SA1 Beckton Riverside.~~ The new neighbourhood will include a large number of homes, new and intensified employment uses and 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. To align with the delivery of a new DLR station or a similarly transformative (as confirmed by Transport for London) public transport intervention, 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. The sewage works will be retained and any environmental impacts will be mitigated through appropriate buffering and design responses. The remaining industrial land will be intensified and continue to attract industrial, utilities, storage and distribution uses utilising the good accessibility to the strategic road network as well as identifying where industrial intensification might be able to take place alongside mixed use development including residential.	The comment you have 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. However this policy approach also received comments regarding certainty of the DLR extension following submission of the business case by TfL. In light of these comments, the Council recognises the importance of ensuring the Plan is justified and has therefore drafted the following modification to policy which will be presented to the Inspector for their consideration:

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/131	Neighbou rhoods	N17 Gallions Reach														Vision 16.3 St William wishes to make a number of specific comments on the vision, as follows: § The vision for Gallions Reach states that it will be achieved through the extension of the DLR and creation of a new DLR station or a similarly transformative (as confirmed by TfL) public transport intervention, along with improved capacity at Gallions Reach station. St William are in the process of discussing the capacity of Gallions Reach station with TfL as part of the proposals for the first phase of development at Beckton Riverside. Their assessments confirm that there is sufficient capacity at Gallions Reach station. St William consider that the vision text should therefore be amended to reference a phased approach to development and seek improved connections and access to Gallions Reach station rather than improved capacity.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] The vision for Gallions Reach will be achieved through the extension of the DLR and the creation of a new DLR station to enable the phased delivery of a housing at a density which is capable of supporting the creation of a new neighbourhood uplift in housing density and the creation of a new Town Centre, supported by transformative transport measures and local infrastructure improvements which could include the DLR line extension and new station. The vision for Gallions Reach will be achieved by:	The comment you have 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. However this policy approach also received comments regarding certainty of the DLR extension following submission of the business case by TfL. In light of these comments, the Council recognises the importance of ensuring the Plan is justified and has therefore drafted the following modification to policy which will be presented to the Inspector for their consideration:
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/132	Neighbou rhoods	N17 Gallions Reach														[Vision] § In line with the above comments, the vision still makes clear that it is the proposed transport interventions that will enable an uplift in housing density at Beckton Riverside. This wording does not reflect the text set out within the OAPF which refers to Beckton Riverside evolving and intensifying to become a Major Town Centre and that a cohesive masterplan should be developed for the variety of the sites within the site allocation to realise the opportunity which will be supported by a DLR extension (or similar transformative public transport intervention). St William consider that the vision should be updated to align with the text in the OAPF for continuity but also to reflect the reality of how large regeneration areas such as Beckton Riverside come forward. The first phase of development at Beckton Riverside will act as a catalyst for growth enabling the wider site allocation to evolve or come forward in phases which will be supported by a DLR extension or other similar transformative public transport intervention.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments]	Comment noted. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/133	Neighbourhoods	N17 Gallions Reach														[Vision] § In addition, and in line with our previous comments, we do consider there should be reference to a ‘significant’ uplift in housing density rather than just an uplift in housing density to reflect the Site’s location in an opportunity area and its strategic role in housing delivery not just for Beckton and the Borough, but London more widely. LBNs significant short fall in housing (only being able to demonstrate a 2.69 year housing land supply) and recent NPPF consultation placing greater emphasis on the role of brownfield land demonstrates the need for brownfield sites in growth areas to maximise their contribution which can only be achieved through a step change in density.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments]	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan's approach to density is positively prepared and justified. 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 transformation of N17.SA1 Beckton Riverside. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/134	Neighbourhoods	N17 Gallions Reach														[Vision] § Reference to the Site’s location within the Gallions Reach Tall Building Zone is welcomed. Specific comments on the Tall Building Zone policy and the prescribed heights within the Gallions Reach Tall Building Zone can be found in relation to draft Policy D4, which note that as currently drafted the maximum heights (32m-50m) are not considered tall enough for a strategic site of this nature nor do they fully reflect the heights proposed as part of the Phase 1 proposals which have been subject to extensive pre-application discussion with LBN (including LBN’s Design Review Panel) and the GLA. Where heights are prescribed these should also acknowledge that a design led approach should be taken to optimising housing delivery.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments]	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because the site allocations requirements result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. In line with London Plan policies D9 and D3, 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 pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by 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 for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Furthermore, your suggested wording on airport constraints it is not considered appropriate because engagement on the safeguarding controls associated with the Airport’s operations will be undertaken with the London City Airport at pre-application stage. Council is satisfied that the plan is sound without the proposed changes. A response to your suggested wording modification in relation to the DLR contingencies was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to support suitably scaled and located deadweight development to enable early phased development in proximity to Gallions Reach DLR station. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/135	Neighbou rhoods	N17 Gallions Reach			N17.2											§ N17 Part 2 encourages development to integrate and reflect the historic uses of the site such as the former gasholders and Victorian river piers, as features of the neighbourhood’s character. Whilst the principle of reflecting the previous use of the Site in any future development proposal is supported, and an approach that St William are familiar with from the redevelopment of their former gasworks sites, as previously noted the former gasholders no longer exist on site (and have never been subject to a formal or local heritage designation). It is also pertinent to acknowledge within the policy wording that the Victorian river piers are not within the ownership or control of St William and therefore any development, restoration or refurbishment would be subject to a third party. This should be made clearer at Part 2 and the approach to reflecting the previous use within development proposals should be proportionate to the existing position on site.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] encouraging development to integrate and reflect the historic uses of the site such as the former gasholders and Victorian river piers, as features of the neighbourhood’s character. Any works carried out on the Victorian river piers would be subject to a third party involvement.	This wording addition is not supported. We did not consider this wording to be necessary as it is understood that the Victorian river piers are not under St William Homes ownership and therefore it is anticipated that any works would be subject to third party involvement. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/136	Neighbou rhoods	N17 Gallions Reach			N17.9											§ Part 9 outlines policy support for the extension of the DLR depot (which we assume aligns with the proposed extension to the SIL in this location should the DLR not come forward). We previously raised concern over the size of this proposed extension and the potential for any further extension to the SIL (which applies to the DLR depot) in such close proximity to the existing Gallions Reach DLR station which would encroach on St William owned land. Any encroachment onto St William’s land has the potential to significantly reduce any future developable area which is not supported especially owing to the exceptional abnormal circumstances of this former gasworks site and various other site constraints including the existing safeguarded land. It should also be noted that there may be future opportunities to masterplan a future mixed-use build over the depot. To this end, St William has suggested some additional text for Part 9 which seeks to ensure that any future extension of the DLR depot is well considered in collaboration with other stakeholders at Beckton Riverside.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] supporting the future extension of the DLR depot, which is well considered in collaboration with other stakeholders at Beckton Riverside	This wording change is not supported. We did not consider this change to be necessary as LB Newham has not been made aware of the need for further expansion of the DLR depot that would encroach upon St William land. Part 9 of the policy supports the extension of the existing DLR depot to the north and south, which is currently under construction. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/137	Neighbou rhoods	N17 Gallions Reach			N17.11											§ Part 11 in relation to improving conditions for walking, cycling and public transport seeks the provision of new bridges for walking and cycling to help mitigate severance caused by new train tracks, including through the provision of new bridges for walking and cycling (Part 10) as well as the provision of new crossings at Royal Docks Road, Gallions Reach roundabout, Alfred’s Way and across the River Roding to reduce severance and to improve connectivity to Beckton and the wider network of neighbourhoods (Part 11e). In both of these cases, we still consider that these requirements should be subject to the feasibility and viability of doing so. Bridges in particular are usually subject to multiple land ownerships which can present a challenge in the delivery of a new connection. Furthermore, they clearly come at a significant cost which must be considered in the round of other development costs and considered as part of the viability of the development. § Part 11c also outlines its support for the provision of a Thames Clipper Pier. Again, whilst St William support the principle of a Thames Clipper Pier at Beckton Riverside it comes with a number of considerations including demand, cost, siting and process for its delivery. The requirement for a Thames Clipper Pier should not place additional burden on the delivery of development at Beckton Riverside as it is not considered an essential piece of infrastructure to enable development. The Phase 1 proposals at Beckton Riverside would not prejudice the provision of a new Thames Clipper Pier and it is considered that the policy wording should be updated to reflect this.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] ---Regulation 19 policy wording--- improving conditions for walking, cycling and public transport by: c. supporting the provision of a Thames Clipper Pier, where feasible and viable; e. providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding to reduce severance and to improve connectivity to Beckton and the wider network of neighbourhoods, where feasible and viable; [...] Vision Point 15 providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding to reduce severance and to improve connectivity to Beckton and the wider network of neighbourhoods, where feasible and viable;	A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements are justified as this part of the policy sets the overall vision of the neighbourhood. Requirements for particular sites will be assessed against any site allocation requirements and the neighbourhood policy. Development of the strategy involved using modelling to understand walking, cycling, public transport and highway improvements that would be required to support future development. The outcomes of the strategy informed the neighbourhood policies and site allocations and will guide the delivery of sustainable transport schemes by the Council’s Highways and Sustainable Transport team in the future. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/138	Neighbou rhoods	N17 Gallions Reach			N17.12											§ As noted previously, securing public access to green and blue spaces and nature that are currently inaccessible to the public, including opportunities for water-related and water-dependent activities (Part 12) should also be subject to feasibility. There may be technical reasons or reasons of flood risk mitigation that may preclude this in particular public access.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] securing public access to green and water spaces and nature that are currently inaccessible to the public, including opportunities for water-related and waterdependent activities, subject to feasibility;	A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements are justified by up to date evidence base. Newham’s Green and Water Infrastructure Strategy and Newham’s Built Leisure Needs Assessment which inform our policy approach to the borough’s access to water spaces and water-related sport and recreation facilities. Increasing public access to green and water spaces across the neighbourhood a key part of the neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GWS2 and GWS3 which provide further detail on access to green space and access to and along the water. The extent to which improvements are made to public access to these spaces will be determined during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/139	Neighbou rhoods	N17 Gallions Reach			N17.13											§ As noted previously, the retention of existing mature trees on the former gasworks site will be dependent on the extent of remediation required to enable redevelopment which will result in the need for all vegetation including trees to be removed (Part 13). This would also include any Site of Importance for Nature Conservation, which is currently a proposed designation for the Site rather than an existing designation. Whilst it is understood there is a clear desire to increase the provision of open space and areas with biodiversity value across the Borough, the provision of a new SINC on a site that is earmarked for significant regeneration and growth and that is dependent on extensive remediation means that there is a strong likelihood that any SINC designation would need to be removed as soon as the Site is permitted for redevelopment. The proposed SINC designation should therefore be removed in the context of the wider site allocation and site specific characteristics of the former gasworks site.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] retaining existing mature trees and maximising the provision of new open space, green infrastructure and green links, including through new parks and an active, landscaped edge along the water at N17.SA1 Beckton Riverside where feasible, and the use of street trees on Alfred’s Way and opportunities to increase biodiversity ~~and improve existing Sites of Importance for Nature Conservation, particularly along Royal Docks Road and the River Roding in partnership with London Boroughs of Redbridge and Barking and Dagenham;~~	A change to this policy approach has not been made. We did not consider this change to be necessary as the SINC designation is justified by up to date evidence. 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 or 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: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. 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). Newham's SINC Review identified a two new SINC citations in this site allocation, Beckton Riverside and the Thames Gateway Bridge Safeguarded Land SINC. To ensure the Local Plan is clear and easy to use, it was decided that all site allocations should reference the SINC designations in their boundary. Please note Newham’s SINC Review (2025) includes an update to amend an error in the mapping layer for the Royal Docks SINC and to make the Greenway SINC mapping more legible to the reader. Please note that Policy GWS3: Biodiversity, urban greening, and access to nature, part 6 sets out the mitigation hierarchy which should be applied to minimise development impact on Sites of Importance for Nature Conservation. The Council is satisfied that the plan remains sound without the proposed changes. However, this site allocation is missing the named citation for the two SINC's which fall within its boundary. To ensure the ease of use of the Plan the Council had made the following wording change which is included in the modification table: In an area of deficiency of access to all parks. Site contains the Thames Gateway Bridge Safeguarded Land and Beckton Riverside two Sites of Importance for Nature Conservation (SINC's) and is adjacent to the River Thames and tidal tributaries SINC. Air Quality Management Area
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/140	Neighbou rhoods	N17 Gallions Reach														[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] Vision Point 15 providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred’s Way and across the River Roding to reduce severance and to improve connectivity to Beckton and the wider network of neighbourhoods, where feasible and viable;	This wording has not been made. We did not consider this change to be appropriate as improving connectivity with the wider area is a key principle for the neighbourhood, particularly considering the existing road network.. Development of the strategy involved using modelling to understand walking, cycling, public transport and highway improvements that would be required to support future development. The outcomes of the strategy informed the neighbourhood policies and will guide the delivery of sustainable transport	

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					schemes by the Council’s Highways and Sustainable Transport team in the future. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/141	Neighbourhoods	N17 Gallions Reach			N17.17											§ Part 17 requires the provision of a new electricity substation. It should be noted that a new UKPN substation is being delivered on land to the west of Gallions Reach DLR station, just outside the neighbourhood boundary. On this basis, it is requested that this policy wording is updated to reflect the fact that a new electricity substation could be delivered in or close to the new neighbourhood.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] providing a new electricity substation, that can be delivered in/close to the new neighbourhood.	This wording change is not supported. We did not consider this change to be necessary as the policy approach align with the latest proposal of the electricity substation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/142	Neighbourhoods	N17 Gallions Reach			N17.18											§ Part 18 supports the provision of new community facilities when in conformity with draft Local Plan Policy SI2, including a leisure centre and faith facilities. Draft Policy SI2 makes clear that the delivery of new community facilities on identified site allocations should be subject to a needs based assessment at the time of delivery, which is supported but should also be set out within Part 18 of the site allocation for consistency and clarity. The same text should apply to Parts 20 and 21, which require education and health centre provision both of which are also subject to needs based assessment in draft Policy SI2.	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] Vision Point 18 supporting new community facilities when in conformity with Local Plan Policy SI2, including a leisure centre and faith facilities, subject to a needs based assessment at the time of delivery; Vision Point 20 providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way, subject to a needs based assessment at the time of delivery and feasibility; Vision Point 21 requiring a new health centre to provide a wide range of health services, subject to a needs based assessment at the time of delivery;	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. The development principles for site allocation N17.SA1 sets out the need to deliver new community facilities, a leisure centre and faith facilities. The development principles section duly directs the reader to Local Plan Policies SI2 and SI3 for the delivery of these elements. 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. Policy SI3 clause 3 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. The Council is satisfied that the plan remains sound without the proposed changes. However, for consistency and to ensure clarity, the Council has made the following wording change, which is included in the modification table: 18. supporting new community facilities when in conformity with Local Plan ~~Policies~~ Policy -SI2 and SI3 , including a leisure centre and faith facilities at N17.SA1 Beckton Riverside;

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/142a	Neighbou rhoods	N17 Gallions Reach			N17.20											[§ Part 18 supports the provision of new community facilities when in conformity with draft Local Plan Policy SI2, including a leisure centre and faith facilities. Draft Policy SI2 makes clear that the delivery of new community facilities on identified site allocations should be subject to a needs based assessment at the time of delivery, which is supported but should also be set out within Part 18 of the site allocation for consistency and clarity. The same text should apply to Parts 20 and 21, which require education and health centre provision both of which are also subject to needs based assessment in draft Policy SI2.]	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] Vision Point 20 providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way, subject to a needs based assessment at the time of delivery and feasibility;	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. The infrastructure requirements for site allocation N17.SA1 sets out the need to deliver a secondary school and primary school. The infrastructure requirements section duly directs the reader to Local Plan Policy SI4. Policy SI4 clause 1.a sets out that a sufficient supply of primary and secondary schools to meet local need, will be achieved through the delivery of new schools and childcare facilities on identified site allocations, of the scale required to meet the projected need for school places. The implementation text for Policy SI4 goes on to clarify that the planned delivery of primary and secondary schools on site allocations is based on the findings from the pupil forecast (Places for All, London Borough of Newham (2022)). These forecasts identify where facilities are needed based on increased levels of population resulting from residential developments and socio-economic trends. Clause 3 of Policy SI4 seeks to ensure the timely delivery of new education facilities to meet changing pupil place needs. This is clarified in the supporting implementation text. It sets out that the delivery of new education facilities should be flexible in terms of both timescale and design to meet fluctuating pupil place needs. The phasing of education facilities should take place in a timely and coherent manner, delivering the facility at an appropriate phase based on anticipated pupil demand as per the revised pupil forecast. Additionally, 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. The Council is satisfied that the plan remains sound without the proposed changes. However, for consistency and to ensure clarity, the Council has made the following wording changes, which are included in the modification table: 20. providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way at N17.SA1 Beckton Riverside; In addition the following modification to the infrastructure requirements for site allocation N17.SA1 Beckton Riverside: • A secondary school of the scale required to meet projected need for school places in accordance with Local Plan Policy SI4 . 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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/142b	Neighbou rhoods	N17 Gallions Reach			N17.21											[§ Part 18 supports the provision of new community facilities when in conformity with draft Local Plan Policy SI2, including a leisure centre and faith facilities. Draft Policy SI2 makes clear that the delivery of new community facilities on identified site allocations should be subject to a needs based assessment at the time of delivery, which is supported but should also be set out within Part 18 of the site allocation for consistency and clarity. The same text should apply to Parts 20 and 21, which require education and health centre provision both of which are also subject to needs based assessment in draft Policy SI2.]	[Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments] Vision Point 21 requiring a new health centre to provide a wide range of health services, subject to a needs based assessment at the time of delivery ;	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. The development principles for site allocation N17.SA1 sets out the need to deliver a health centre. The infrastructure requirements section duly directs the reader to Local Plan Policy SI2 for the delivery of this element of the allocation and further states the health centre should be designed to meet NHS needs and standards and that it should be subjects to a needs based assessment at the time of delivery. Policy SI2 clause 1.b sets out that a sufficient supply of community facilities and health facilities will be achieved the delivery of new health facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The Council is satisfied that the plan remains sound without the proposed changes. However, for consistency and to ensure clarity, the Council has made the following wording change, which is included in the modification table: 21. requiring a new health centre ~~to provide a wide range of health services at N17.SA1 Beckton Riverside~~
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/143	Neighbou rhoods	N17 Gallions Reach			N17.20											§ With regards to the requirement for a secondary and primary school in close proximity to Atlantis Avenue and Armada Way (Part 20), as currently drafted the prescribed locations for the proposed schools do not account for various different development scenarios and/or design of the masterplan and is insufficiently flexible. Notwithstanding this, if flexibility cannot be incorporated into this policy then St William requests that it makes clear that a secondary school is sought in the north of the neighbourhood and the primary school is sought close to Atlantis Avenue. § Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at Appendix 16.		As previously stated, the Council is satisfied that the plan remains sound without the proposed changes. However, for consistency and to ensure clarity, the Council has made the following wording changes, which are included in the modification table: 20. providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way at N17.SA1 Beckton Riverside ; In addition the following modification to the infrastructure requirements for site allocation N17.SA1 Beckton Riverside: • A secondary school of the scale required to meet projected need for school places in accordance with Local Plan Policy SI4 . 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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/144	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													Site allocation N17.SA1 Beckton Riverside 16.4 Overall, St William welcome the general approach to the Beckton Riverside site allocation N17.SA1 which seeks to encourage the transformation of this site through the delivery of a mixed use neighbourhood including residential development, industrial and employment uses, community and education uses, leisure uses, open space and town centres uses. 16.5 St William welcomes the amendments made to this site allocation which acknowledges that the scale and nature of development on this site is contingent on the proposed changes to transport infrastructure on this site including a new DLR station and track and/or delivery of a river crossing or the release of the safeguarded land for a river crossing. 16.6 St William is pleased that the site allocation is structured in a manner that acknowledges an early phase of development can come forward in advance of the DLR construction contract being let or a similarly transformative public transport intervention has confirmed funding. St William consider this to be a sound approach and will ensure that policy is deliverable over the plan period and regeneration and development at Beckton Riverside can come forward and meet its development potential as set out in the Royal Docks and Becton Riverside Opportunity Area. 16.7 Notwithstanding the above, St William still have a number of specific comments on the site allocation which are provided below.	N1.SA1 Beckton Riverside site allocation – Suggested amendments Existing Public Transport Accessibility [Heritage Designations] Within site allocation: Beckton Archaeological Priority Area (Tier 3) Royal Docks Archaeological Priority Area (Tier3) In proximity of: Gallions Hotel (Grade II* listed) The Royal Standard (Locally listed) Pumping Station Gallions Roundabout, Royal Albert Way, Beckton, London, Newham, E6 6FZ (Locally listed) The Ferndale Public House (Locally listed) 2-100 Winsor Terrace, Beckton, London (Locally listed)	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is effective. Where the PTAL rating is changing to a know figure during the plan period this has already been indicated in the site allocations and is consistent across all site allocations in the Local Plan. For heritage designations, the wording 'in the vicinity of' has been used which is considered to be effective and is consistent across all site allocations. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/145	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													N17.SA1 Beckton Riverside § Existing uses: the updated description of existing uses now makes reference to the SINC designation, which as noted previously is a proposed designation rather than an existing designation and St William considers this to conflict with the overall objective of the site allocation.	N1.SA1 Beckton Riverside site allocation – Suggested amendments The site contains remnants of the former Beckton gas works, the Gallions Reach shopping park and associated car parking and the Beckton DLR depot, which sits to the south of the former Beckon Gas works site, within retained Strategic Industrial Land. The site contains a range of industrial uses in the south west corner of the site also designated as a Strategic Industrial Location. The site also contains larger areas of open space adjacent to the River Thames and the A1020, ~~including an area designated as SINC, which includes an attenuation pond serving Gallions Reach.~~	A change to this policy approach has not been made. We did not consider this change to be necessary as SINC designation is justified by up to date evidence. 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 or 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: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. 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). Newham's SINC Review identified a two new SINC citations in this site allocation, Beckton Riverside and the Thames Gateway Bridge Safeguarded Land SINC. To ensure the Local Plan is clear and easy to use, it was decided that all site allocations should reference the SINC designations in their boundary. Please note Newham's SINC Review (2025) includes an update to amend an error in the mapping layer for the Royal Docks SINC and to make the Greenway SINC mapping more legible to the reader. However, this site allocation is missing the named citation for the two SINC's which fall within its boundary. To ensure the ease of use of the Plan the Council had made the following wording change which is included in the modification table: In an area of deficiency of access to all parks. Site contains ~~the Thames Gateway Bridge Safeguarded Land and Beckton Riverside two~~ Sites of Importance for Nature Conservation (SINC's) and is adjacent to the River Thames and tidal tributaries SINC. Air Quality Management Area Please note that Policy GWS3: Biodiversity, urban greening, and access to nature, part 6 sets out the mitigation hierarchy which should be applied to minimise development impact on Sites of Importance for Nature Conservation.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/146	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside														N1.SA1 Beckton Riverside site allocation – Suggested amendments [full extract of the allocation text at pg 141-143] [...] The scale and nature of development on this site is contingent on the proposed changes to transport infrastructure on this site, including: • a new DLR station and track; and/or • delivery of a river crossing; or • release of the land safeguarded for a river crossing ~~crossing~~ (by the Secretary of State, following recommendation by Transport for London and the Mayor of London). [...]	Typo is noted. This has been rectified by making your wording change: release of the land safeguarded for a river crossing ~~crossing~~ (by the Secretary of State, following recommendation by Transport for London and the Mayor of London). [...] which is included in the modification table.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/147	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													§ Development principles: § Employment uses outside of the SIL should not be limited to light industrial but could support local employment spaces such as makers space or other employment generating uses which could include the full range of town centre uses.	N1.SA1 Beckton Riverside site allocation – Suggested amendments [full extract of the allocation text at pg 141-143] Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding: [...] • The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, in particular transport and utilities infrastructure and large scale industrial uses with a focus on logistics and warehousing and clean, green and low carbon industries. Employment uses outside of the Strategic Industrial Locations should not be limited to for light industrial uses but can also support spaces such as makers space and/or other employment generating uses.	This wording change is not supported. We did not consider this change to be necessary as while the development principle of the site allocation outlines the priority employment needs based on the Employment Land Review 2022, the site allocation wording would not preclude other employment uses being delivered, provided they meet the policy requirements set out in the relevant Local Plan policies. Light industrial use is identified as an appropriate scale and nature of industrial uses at the site, outside the SIL, to ensure compatibility with residential developments. Makers space can also be delivered in form of light industrial floorspace. Any main town centre uses proposed at the site should apply town centre first principle according to the High Street Policy. Furthermore, the term 'employment generating uses' is not consistent with how employment uses are referred to across the Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/148	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Development principles] § As noted earlier in these representations, the requirement for a new health centre should be subject to an up to date needs assessment at the time of delivery as well as being subject to NHS requirements. Newham should be aware that the NHS do not typically require smaller facilities now and instead focus their efforts on delivering larger facilities in this instance in the future town centre. The provision of a small health centre in the neighbourhood parade should therefore be subject to a needs based assessment and discussion with the NHS. The provision of an expanded health hub close to the town centre should be not be assumed to be an expanded health hub and policy wording should incorporate a scenario where this could be a new health centre provision depending on the outcome of discussions with the NHS.	N1.SA17 Beckton Riverside site allocation – Suggested amendments [full extract of the allocation text at pg 141-143] Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding: [...] • The health centre should be located in the neighbourhood parade and the primary school and associated early years’ provision should be located in the southern part of the site, in close proximity to the new developments to the south of site, subject to an up to date needs assessment at the time of delivery as well as being subject to NHS requirements.	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. In addition, we did not consider this change to be necessary as the Local Plan is applied in the round and further guidance regarding a needs based assessment is provide in policy SI2. 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 draft site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024). This work has identified the need for site allocation N17.SA1 to provide a health centre designed to meet NHS needs and standards. The infrastructure requirements for this site allocation already state that the provision of health facilities should be subject to a needs based assessment at the time of delivery and meet the requirements of Local Plan Policy SI2. Policy SI2 clause 1.b sets out that a sufficient supply of community facilities and health facilities will be achieved the delivery of new health facilities on identified site allocations, subject to a needs-based assessment at the time of delivery The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/149	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Development principles] § S William supports the principle of improved links to the Greenway; however, it is pertinent to acknowledge in policy wording that this will require third party involvement as all land between the site allocation and the Greenway is not within St William’s ownership and therefore cannot to commit to the delivery as written. Therefore, policy wording should be caveated to state that this should be delivered ‘where deliverable’.	N1.SA1 Beckton Riverside site allocation – Suggested amendments [full extract of the allocation text at pg 141-143] Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding: [...] • Development should deliver the Local Park, the continuation of the Thames Path through the site, an enhanced route to Gallions Reach DLR station and the extension of the Greenway into the site at the earliest opportunity, where deliverable.	This wording change is not supported. We did not consider this change to be necessary as the delivery of the site allocation will be by a range of landowners, infrastructure providers and public sector bodies. It is also noted that this was a key proposal in the RD and BR OAPF. This is why the masterplanning process outlined in policy BFN2 is so important as it enables coordination between landowners to deliver the principals outlined in the site allocation and ensure sustainable development. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/150	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Development principles] § Finally, St William wish to reiterate previous comments and suggestions that the site allocation should acknowledge the exceptional circumstances associated with former gasworks sites, which require substantial remediation to enable the redevelopment of these sites. National Planning Policy Framework paragraph 124 gives “substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.” London Plan footnote 59 recognises that “some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available”. Former gasworks sites benefit from London Plan policies, and the full weight of the Framework. They represent an opportunity to remediate despoiled, degraded, derelict and contaminated land and are subject to substantial decontamination, enabling and remediation costs.	N1.SA1 Beckton Riverside site allocation – Suggested amendments [...] All development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023). Development should acknowledge the associated costs of decommissioning and redeveloping a former gasworks site and the relocation of any significant equipment, including the need to address any environmental pollution and on-site decontamination requirements caused by the gas works.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is justified, effective and positively planned. All the site allocation policies are consistent and set out the broad parameters for each site regarding development principles, design principles, infrastructure requirements and phasing and implementation. The detail proposed would be considered on a case-by-case basis during the development management process. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/151	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													§ Design principles: § With reference to building height references within the site allocation, St William maintain that the site allocation should make clear that the Site is located within the Gallions Reach Tall Building Zone (TBZ5 as outlined in Policy D4). § In line with our comments on draft Policy D4 on Tall Building Zone 5 Gallions Reach, the heights cited do not fully reflect the heights proposed within the Phase 1 Beckton Riverside application and which have been subject to extensive preapplication engagement and design review. The maximum heights cited are also not considered to be reflective of the Site’s location within an opportunity area, alongside the river or to reflect the lack of sensitivities in this area i.e. no heritage assets, no existing residential, proximity of industrial uses follow a design led approach in line with Policy D3 of the London Plan. § St William requests that building heights are adjusted to extend to between 17 and 27 storeys (rather than up to 16 storeys as drafted) with building heights stepping down in areas which are controlled by CAA height restrictions. § All design principles should follow a design led approach that optimises delivery in line with the London Plan.	N1.SA1 Beckton Riverside site allocation – Suggested amendments The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. The masterplan must demonstrate that the proposed development is designed with suitable flexibility to accommodate the full range of transport options under consideration by Transport for London at the time of application and is phased to ensure sufficient transport infrastructure will be in place to support the development as it is occupied. Tall buildings should be delivered in line with the building heights outlined within Policy D4 and the guidance for Tall Building Zone 5: Gallions Reach, with building hegiths ranging between 17 and 27 storeys with building heights stepping down in areas controlled by CAA height restrictions. ~~In the southern part of the site, building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to 40m (ca.13 storeys) in limited locations~~To be located within the areas closest to Gallions Reach DLR station and alongside the riverside, with consideration given to marking the neighbourhood parade, and should follow a design led approach. With Buildings being should set back from the watercourse to avoid overshadowing impact. ~~In the northern part of the site, and once the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding, building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to 50m (ca.16 storeys) in limited locations at the new town centre and DLR station.~~	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because the site allocations requirements result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. In line with London Plan policies D9 and D3, 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 pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by 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 for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Furthermore, your suggested wording on airport constraints it is not considered appropriate because engagement on the safeguarding controls associated with the Airport’s operations will be undertaken with the London City Airport at pre-application stage. Council is satisfied that the plan is sound without the proposed changes. A response to your suggested wording modification in relation to the DLR contingencies was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to support suitably scaled and located deadweight development to enable early phased development in proximity to Gallions Reach DLR station. The Council’s response has not changed.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/152	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													§ Infrastructure requirements: § In line with earlier comments in these representations references to improving capacity at Gallions Reach DLR should be adjusted to refer to improved access and connections to Gallions Reach DLR on the basis that recent analysis has demonstrated that there is sufficient surplus capacity at Gallions Reach DLR.		A change to this policy has not been made. We did not consider this change to be necessary as this requirement has been justified in the sustainable transport strategy and in discussions with TfL. As part of their Regulation 19 consultation response, TfL reaffirm that improvements to Gallions Reach station will be required, and therefore no changes to the policy have been made. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/153	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Infrastructure requirements] § St William raises concern with the new requirement for an automated vacuum collection system on the Beckton Riverside site. Whilst the N17 Gallions Reach neighbourhood and associated site allocation relates to the entire Beckton Riverside area, at this stage and in advance of any transformative public transport intervention only an early phase of delivery is proposed to come forward. The proposed quantum of development within this first phase is not of a sufficient scale to be able to support the upfront costs of an automated vacuum collection system which has to date only been implemented at two strategic development sites in London – Wembley and Barking Riverside. Furthermore, the proposals for Beckton Riverside Phase 1 have been developed ahead of this requirement in draft policy wording. On this basis, St William request that this requirement is removed or made clear that it is to be considered as part of a feasibility and viability study.	N1.SA1 Beckton Riverside site allocation – Suggested amendments [Infrastructure requirements] ~~Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8, and subject to feasibility and viability studies.~~	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.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/154	Neighbou rhoods	N17 Gallions Reach	N17.SA1 Beckton Riverside													[Infrastructure requirements] § The requirement for an expanded health hub (on the basis and assumption that a new health centre has been provided within an earlier phase of development) should be updated to state that it is either a new or expanded health hub on the basis that the provision of a health centre in the early phase of development may not meet NHS requirements because of its scale.	N1.SA17 Beckton Riverside site allocation – Suggested amendments [infrastructure requirements] Once the DLR construction contract is let, or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding, development should deliver: [...] • An expanded health hub (designed to meet NHS needs and standards for the projected population on the basis that it is either a new or expanded health hub on the basis that the provision of a health centre in the early phase of development may not meet NHS requirements due to its scale; and	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. In addition, we did not consider this change to be necessary as the Local Plan is applied in the round and further guidance regarding a needs based assessment is provide in policy SI2. 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 draft site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024). This work has identified the need for site allocation N17.SA1 to provide a health centre designed to meet NHS needs and standards. The infrastructure requirements for this site allocation already state that the provision of health facilities should be subject to a needs based assessment at the time of delivery and meet the requirements of Local Plan Policy SI2. Policy SI2 clause 1.b sets out that a sufficient supply of community facilities and health facilities will be achieved by the delivery of new health facilities on identified site allocations, subject to a needs-based assessment at the time of delivery The site allocation clearly sets out the need for health facilities on this site prior to a future DLR extension. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/155	Neighbours	N17 Gallions Reach	N17.SA1 Beckton Riverside													§ Phasing and implementation: § Phasing should be early, medium and long term.	N1.SA1 Beckton Riverside site allocation – Suggested amendments [Phasing and implementation] Short to Medium to long term	A change to this policy approach has not been made. We did not consider this change to be necessary as our approach to trajectory phasing is consistent with national planning policy and justified. Sites without planning permission are not included within the short term phase of the plan period. Full details of the methodology for site phasing are set out in the Site Allocation and Housing Trajectory Methodology. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/034-k	Design	N17 Gallions Reach			Table 1 Tall Building Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N17 Area: Gallions Reach Height Limit: Up to 50m Comment: Acceptable development height but must also be subject to a further IFP/ILS analysis. Proposed Mitigation: Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ5: Gallions Reach] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/055	Neighbourhoods	N17 Gallions Reach			Up to 50m											Acceptable development height but must also be subject to a further IFP/ILS analysis	Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [22. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.
Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/002	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					No	No						Blank	Representations N2.SA2 Lyle Park West The draft plan and site allocation allocates the wider site for mixed use redevelopment, which is consistent with the existing Local Plan. The draft site allocation includes an indicative map that allocates my client’s site (Land west of 1 Knights Road) as an ‘opportunity for neighbourhood parade’. My client welcomes the revisions to the masterplan following the Regulation 18 consultation that allocated their site to be within ‘opportunity for open space’. Our client made representations to the previous consultation, and it is welcomed that these have been considered.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/003	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					No	No						Blank	[Representations N2.SA2 Lyle Park West The draft plan and site allocation allocates the wider site for mixed use redevelopment, which is consistent with the existing Local Plan. The draft site allocation includes an indicative map that allocates my client’s site (Land west of 1 Knights Road) as an ‘opportunity for neighbourhood parade’. My client welcomes the revisions to the masterplan following the Regulation 18 consultation that allocated their site to be within ‘opportunity for open space’. Our client made representations to the previous consultation, and it is welcomed that these have been considered.] However, my client still has concerns around the soundness of some of the detail within the site allocation as set out below.		Comment noted. Separate responses have been provided to Hagley Ltd regarding the comments raised on site allocation N2.SA2.

Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/003a	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West						No	No						Blank	Building Heights The draft site allocation and draft Policy D4 states building heights should range between 21m-32m (7-10 storeys) with taller buildings up to 40m (13 storeys) towards the south of the site fronting the river and around the station as part of the Lyle Park Neighbourhood Parade. Whilst it is welcomed the site falls within a Tall Building Zone, my client objects to a restriction on building heights at this height, that are lower than the existing Local Plan and prevailing character of the area. It is considered this restriction and reduction in building heights is unsound and unjustified for the following reasons: Lack of Justification for Change to Existing Local Plan position on Building Heights The existing Local Plan sets indicative heights for the same site allocation of 10-12 storeys and up to 18 storeys at key locations. There is no justification for a downward move on prescribed heights set out in this draft plan. The evidence base for the Local Plan, relevant to tall buildings includes the Tall Building Assessment and Characterisation Study. These inform the tall building policy. For this site allocation it considers the site is ‘not sensitive to change’, in a ‘high opportunity for growth area’ and a designated area for ‘transform’. The site is in a very sustainable location next to West Silvertown DLR Station. There is nothing within the supporting evidence base that justifies imposing a cap on building heights that is lower than the existing Local Plan position. Existing Local Plan Inspector’s Comments on Building Heights The Inspector’s report into the Newham Local Plan Review (2018) (para 40), assessed the proposed building heights for the Strategic Sites, including Lyle Park West at paras 45-49. The Inspector found it unjustified for previously proposed building heights to be restricted and ultimately required taller building heights for Lyle Park West to make the allocation and plan sound. Relevent extract below. “However, within the Strategic Sites at Thames Wharf (S08), Silvertown Landing (S09), Lyle Park West (S20) and Minoco Wharf (S22), the PTAL scores are higher than those further east or closer to the Docks, with the prospect of further improvements through new stations and overall better access arrangements due to station proximity and connections to other stations/services. Consequently, within these areas, there is scope and justification to increase the indicative heights of tall buildings on these sites, but not those elsewhere in the area where heritage considerations are also more significant. As it stands, the restriction of building heights in these Strategic Sites is	A change to this policy approach has not been made. Whilst we acknowledge greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the adopted Local Plan has been informed by a different evidence base. Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in a transform area with low sensitivity to change and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, TBZ11: Lyle Park West has been identified as a suitable area for tall buildings. The referenced Inspector’s report into the Newham Local Plan Review (2018) considered the site suitable for greater height based on Public Transport Accessibility Level (PTAL) consideration. However, the more detailed townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), has taken into account, not only the proximity to public transport, but also the agent of change principles raised at regulation 18 consultation from the adjacent Strategic Industrial Location (SIL) industrial operator. Therefore, the maximum height parameter on TBZ11: Lyle Park West and N2.SA2 Lyle Park West has decreased at regulation 19 to ensure the existing adjacent SIL is protected and enhanced in line with Policy J1. More details on the methodology could be found in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

unjustified, as it fails to reflect their role and function as key regeneration sites in accessible locations, contrary to both the Framework’s core planning principles outlined in paragraph 17 (especially supporting sustainable economic development; encouraging the effective use of land; promoting mixed use developments; and making the fullest possible use of public transport) and the need to respond effectively to the demographic and economic needs of London. 50. To this end MM 36, 37, 42 & 55 increase the indicative building heights to 10-12 storeys and up to 18 storeys at key locations within these four Strategic Sites. The provision for even higher buildings generally reflects their very accessible locations in relation to public transport provision.

Whilst there have been changes to the NPPF since 2018, these changes have not resulted in a requirement for lower buildings. Indeed, the current NPPF places a greater emphasis on making effective use of land and building at higher densities. Paragraph 129 requires plans to,

“contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.”

Paragraph 130 continues to explain where this would not be appropriate and clarifies this to be where the resulting built form would be wholly out of character with the existing area. The surrounding character of Knights Road is tall buildings of 10-12+ storeys. Lyle Park West development immediately adjacent to our client’s site and part of the site allocation includes building heights from 12-20 storeys. Deanston Wharf to the east of this site comprises buildings of 10-17 storeys and the recently developed scheme on the opposite side of Knights Road comprises 12 storeys. The surrounding context is therefore high density, tall buildings. Given the NPPF’s requirement to increase density and height in areas well served by public transport such as at Lyle Park West, there is no scope or justification for reducing the prescribed height of buildings.

It is therefore considered the proposed restrictive cap on indicative building heights for this Strategic Site Location is unjustified and unsound, and should revert to the current Local Plan range of heights at a minimum of 10-12 storeys and 18 at key locations. These should be indicative and minimum to allow flexibility and sites to be optimised in accordance with the NPPF.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/004	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					No	No						Blank	[Representations N2.SA2 Lyle Park West The draft plan and site allocation allocates the wider site for mixed use redevelopment, which is consistent with the existing Local Plan. The draft site allocation includes an indicative map that allocates my client’s site (Land west of 1 Knights Road) as an ‘opportunity for neighbourhood parade’. My client welcomes the revisions to the masterplan following the Regulation 18 consultation that allocated their site to be within ‘opportunity for open space’. Our client made representations to the previous consultation, and it is welcomed that these have been considered. However, my client still has concerns around the soundness of some of the detail within the site allocation as set out below.] Comprehensive Development The allocation requires the site to be designed and developed comprehensively. Whilst a coordinated approach is sensible, the reality is there are a number of different landowners that represent various sites within the site allocation. The landowners have different aspirations for bringing forward development on their sites. Therefore, it is unrealistic to require the development to come forward comprehensively together. The main site to the southwest of my client’s site has an extant planning permission that we understand has been implemented. Therefore, this cannot be redesigned and is now a fixed parameter for development especially for sites bordering it such as my client’s site to the north. In addition, my client’s previous efforts to engage with L&Q regarding a comprehensive masterplan were met with a complete unwillingness to engage. To ensure successful delivery of development within the Site Allocation it is therefore suggested the wording of comprehensive development requirement is changed to be more flexible and realistic is supporting land parcels coming forward, recognizing fixed parameters such as extant planning permissions and different land ownership.	Suggested changed wording is below: Design principles ~~The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2~~ New text inserted “the site should be designed and developed to consider existing uses, extant permissions and the principles set out in Site Allocation N2.SA2. Proposed development should not jeopardise development coming forward on adjacent sites”.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/052	Neighbourhoods	N2 Royal Victoria														[We support the provision of a riverside pier at or near Thames Wharf which would enable river bus services to serve the area. This pier and pump primed operating costs will need to be fully funded through developer contributions and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided] We note that safeguarding of land for a river pier and river pier facilities has now been added to site allocation N2.SA4 but there is no requirement for development to fund its provision.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Sustainable Transport Strategy found that riverside piers weren't necessary to enable development and as such were not prioritised for investment where resources are limited. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/053	Neighbourhoods	N2 Royal Victoria														[We support a new DLR station at Thames Wharf and bridge links to Trinity Buoy Wharf and Leamouth Peninsula crossing. These will need to be fully funded through development contributions or other funding sources because TfL is not able to commit funding at the current time.] We note that there is no requirement for development to fully fund provision of the DLR station or the bridge links although the DLR station is an infrastructure requirement for site and land for the two bridge links is safeguarded.		Comment noted. N2.SA4 Thameside West states that "Development should provide a new DLR station" and "Development should safeguard space for a River Pier Landing Facilities and a River Pier". The implementation text of Policy T1.1 details that transport projects are set out in the Infrastructure Delivery Plan. The approach taken to all obligations in the Plan 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.
Reg19-E-013	Transport for London		Reg19-E-013/054	Neighbourhoods	N2 Royal Victoria														[The Custom House and Prince Regent DLR Station bus stands sit within the neighbourhood boundary and will need to be retained but are outside any site allocations. The agent of change principle should be applied to any nearby development.] Although no change has been made to the infrastructure requirements we note that Policy T1 now explicitly mentions bus stands.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/055	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays													[Under 'Infrastructure requirements', the need for significant funding for transport improvements is needed to mitigate the impacts of trip generation. The 2016 permission (14/01605/OUT) included developer funding for a Pontoon Dock station upgrade, cycle hire docking stations and public transport capacity improvements. With an increased quantum of development and changes now proposed, the contributions should be increased to reflect this, subsequent cost increases and changes in standards/context since 2016. Grampian conditions or obligations must be applied as before, with significant funding sought for the station in particular]	We welcome inclusion of the following in the Infrastructure Requirements with the minor correction as shown: 'Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.'	Support noted. The Council notes the proposed modification to clarify that escalators are not currently present at the station. This is not considered necessary for soundness. However, the Council recognises the importance of ensuring the Plan is factually accurate, and therefore made the following wording change which is included in the modification table. Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/056	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays													[The scheme should contribute to green infrastructure as set out in the Public Realm Framework and draft Royal Docks and Beckton Riverside Opportunity Area Planning Framework. Streets should play a role in enhancing the green estate in the area, including the delivery of sustainable urban drainage systems that also enhance the public realm.] We welcome the new wording in the design principles of N2.SA1 which has updated the green infrastructure requirements.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/057	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													[Developer funding for active and sustainable transport improvements will be required. Grampian conditions or obligations should be applied to enable delivery and mitigation of development impact in line with London Plan policy. Assessment of the capacity of West Silvertown station will be necessary, and a contribution secured from developers to mitigate impacts. Permeability for people walking and cycling will be expected to/from the riverside and throughout the area.] We welcome inclusion of the following in the Infrastructure Requirements: ‘Development should contribute to active and public transport upgrades as well as an assessment of the capacity of West Silvertown Station and potential mitigation measures.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/058	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West						No								The northern boundary of the site includes land and airspace occupied by DLR West Silvertown Station and viaducts. To ensure soundness the following wording should be added as an infrastructure requirement: ‘ The potential constraint of the DLR station and structures on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection. ’	A change to this policy approach has not been made. We did not consider this change to be necessary as 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.
Reg19-E-013	Transport for London		Reg19-E-013/059	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													[As with Silvertown Quays, developer funding for a Pontoon Dock station upgrade and other active and sustainable transport improvements are required. Grampian conditions or obligations should be applied to enable delivery and mitigation of development impact in line with London Plan policy. Permeability for people walking and cycling will be expected to/from the riverside and throughout the area] We welcome inclusion of the following in the Infrastructure Requirements: ‘Development should provide an upgrade of Pontoon Dock Station, including escalators to improve access to the station.’		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/060	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside						No								The DLR viaduct passes diagonally across the north end of the site. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the DLR structures on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.
Reg19-E-013	Transport for London		Reg19-E-013/061	Neighbourhoods	N2 Royal Victoria	N2.SA4 Thameside West													[We support the principles outlined and, in respect of the 2020 permission (18/03557/OUT), consider the site-specific opportunities available to promote sustainable transport modes have been taken up. We also agree that safe and suitable access to site will be achieved for all users, and significant capacity and safety impacts from development will be mitigated to an acceptable degree. However, delivery funding, especially of the new station, remains an issue.] We note that no changes have been made in response to this point		A change to this policy approach has not been made. We did not consider this change to be necessary 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. 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 Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/062	Neighbourhoods	N2 Royal Victoria	N2.SA4 Thameside West						No								We attach plans in appendix B showing approximate locations of LU Jubilee line tunnels under site as red dashed lines, DLR surface lines shaded purple, Cable car air space above site hatched purple and land acquired for Silvertown Tunnel surface works and tunnels shaded green. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the London Underground and Silvertown Tunnel assets below ground, the DLR and Silvertown Tunnel assets at ground level and the Cable Car airspace on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	Comment noted. This comment has been subject to further discussion with Transport for London 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. However, the Council recognises the importance of ensuring the Plan is consistent and has therefore made the following wording change which is included in the modification table. i. Radar stations and sightline ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots iii. Buses – priority measures, stands (including drivers’ facilities), stations and depots/ garages iv. Protected mooring points, public river access points and piers v. Bridges and tunnels vi. Safeguarded wharves and their access requirements vii. Rail heads and their access requirements viii. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements) ix. London Cable Car

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/062	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/063	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N2.SA2 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/064	Neighbou rhoods	N2 Royal Victoria	N2.SA4 Thamesid e West					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/065	Neighbou rhoods	N2 Royal Victoria	N2.SA4 Thamesid e West					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N2.SA4 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/066	Neighbourhoods	N2 Royal Victoria	N2.SA4 Thameside West					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/067	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance					Blank	No						Blank	[Water Response] No water supply requirements identified at this stage	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted.
Reg19-E-033	Thames Water		Reg19-E-033/068	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/133	Neighbou rhoods	N2 Royal Victoria	N2.SA1 Silvertow n Quays					Blank	No						Blank	[Silvertown Quays Bounded By Royal Victoria Dock Connaught Bridge Mill Rd, LONDON (APPROVED)] [Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/134	Neighbou rhoods	N2 Royal Victoria	N2.SA1 Silvertow n Quays					Blank	No						Blank	[Silvertown Quays Bounded By Royal Victoria Dock Connaught Bridge Mill Rd, LONDON (APPROVED)] [Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N2.SA1 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, which will need to reflect the cumulative impact of significant quantities of development in this location. This requires early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

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

																	structures; the erection of buildings, including tall buildings, comprising a new local centre; a primary school (Use Class D1); residential units (Use Class C3); flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted) and B8); flexible employment floorspace (Use Classes B1c, B2 and B8); flexible retail floorspace (Use Classes A1-A4); community and leisure floorspace (Use Classes D1 and D2); the construction of a new flood defence wall and delivery of ecological habitat adjacent to the River Thames and associated infrastructure; streets, open spaces, landscaping and public realm (including new park and SINC improvements); car, motorcycle and bicycle parking spaces and servicing spaces; utilities including energy centre and electricity substations; and other works incidental to the proposed development .” The Detailed Component of the planning permission was commenced by demolishing the Vision Centre annexe of the Silver Building in May 2024. The Council granted a Certificate of Lawfulness of Existing Use or Development (‘CLEUD’) in July 2024 confirming that the demolition works lawfully implemented the Detailed Component of the Hybrid Planning Permission in accordance with Condition 3 (LBN ref. 24/1244/CLE). In September 2024, the Council validated the first Reserved Matters Application relating to the Outline Component of the Hybrid Planning Permission (ref. 24/01507/REM). The RMA was submitted before the 4th of October 2024 – i.e., no later than three years after the grant of planning permission – in accordance with condition 4. All pre-commencement planning conditions relating to the Detailed Component (Phase 1 – Buildings A and B) of the Hybrid Planning Permission were discharged prior to the commencement of demolition works to implement the consent. Relevant Section 106 planning obligations were also discharged prior to the demolition works and approved under reference 24/00763/S106. Representations submitted by SHL in response to the Regulation 18 Consultation (February 2023) raised concern that the Site Allocation text for Land at Thameside West did not accurately reflect the sites planning history, including the status of the Operational Works Permission or the Hybrid Planning Permission. Concern was also raised that the associated illustrative site layout drawing did not reflect the approved development and that the Site Allocation text sought to limit building heights to 50m (circa 16 storeys) when the Hybrid Planning Permission permits buildings up to 98m (circa 26 storeys). Clarity was also sought with regards to how the infrastructure required for the development would be delivered, including the DLR Station and potential bridge connections. It was suggested that the supporting text relating to		between ~~51,425 and 53,784~~53,194 and 54,976 quality residential units between 2023 and 2038. [...] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~53,194 and 54,976 additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~2,957 Medium term; 2028/29 – 2032/33; ~~3,836~~3,966 Long term; 2033/34 – 2037/38; ~~3,475~~3,716

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			development phasing should be amended to explicitly allow phases to come forward under different ownerships. In response to the representations submitted at Regulation 18 stage it is acknowledged that the Council have made the following updates to the Site Allocation text and associated diagrams: • the Site Allocation text referring to the site’s planning history has been removed. • The illustrative site layout plan has been replaced by an opportunities and constraints diagram (the removal of the illustrative plan addresses wider concerns such as not showing the Silvertown Tunnel Safeguarding Area and other plan inconsistencies) • The infrastructure requirements section of the site allocation has been updated to clarity that land should be safeguarded for the two bridge connections (Trinity Buoy to Thames Wharf Bridge and the land to the south of the Lower Lea Crossing to Good Luck Hope bridge) rather than requiring those connections to be provided/delivered as part of the development proposals. The Site Allocation text has not been updated provide clarity on how the DLR station will be delivered. However, no changes have been made to supporting text under the ‘Design Principles’ in relation to buildings heights, which are still limited to a maximum height of 50m. The updates to the Site Allocation text and associated visual material have therefore only partly addressed the concerns that were raised by SHL in response to Regulation 18 Consultation. SHL are concerned that the building heights referred to in the Site Allocation text are lower than what has been approved under the Hybrid Planning Permission. The NPPF required Local Plans to be positively prepared by providing a strategy which as a minimum seeks to meet the objectively assessed needs of the area. Limiting the building heights has the effect of significantly reducing the sites housing capacity and does not reflect the development consented by the Hybrid Planning Permission.		

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

[illegible]

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					between ~~51,425 and 53,784~~ 53,194 and 54,976 quality residential units between 2023 and 2038. [...] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~ 53,194 and 54,976 additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~ 2,957 Medium term; 2028/29 – 2032/33; ~~3,836~~ 3,966 Long term; 2033/34 – 2037/38; ~~3,475~~ 3,716
Reg19-E-173	L&Q		Reg19-E-173/034	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													As set out in national planning practice guidance, where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development (Reference ID: 61-002-20190315). The NPPF at Paragraph 132 also states that ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.’ The draft allocation N2.SA2 clearly fails to achieve these requirements by virtue of the fact that aspects of the draft allocation are incompatible with an extant planning permission, which is a material planning consideration.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/035	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													In January 2021 planning permission was granted in respect of the north western part of the allocation site (L&Q’s ownership) for ‘Comprehensive redevelopment of site to provide residential-led, mixed-use development of 3no. blocks ranging from 12 to 20 storeys in height comprising 252 residential units (Use Class C3), and new local centre at ground level comprising 1,078sqm (GIA) of flexible commercial floorspace (Use Class A1/A2/A3/D1/D2) with associated new public realm, landscaping, car parking, cycle parking and associated works.’ (LPA ref: 19/01791/FUL). The implementation of the planning permission was confirmed in application LPA ref: 23/02432/CLE.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/036	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The draft allocation states that building heights should range between 21 – 32m (ca. 7 – 10 storeys) with taller buildings up to 40m (ca. 13 storeys) in certain areas including around the station as part of the Lyle Park Neighbourhood Parade. This aligns with draft policy D4 (TBZ11), however, this conflicts with the implemented planning permission for heights of 12 to 20 storeys (41 to 66 metres) on the L&Q site. It also represents a reduction of development potential against the adopted site allocation S20, which highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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 site 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/037	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The committee report for the planning permission 19/01791/FUL (at paragraph 7.2.80) makes clear that the consented heights were appropriate cognisant of the 2018 allocation and the policies of the 2021 London Plan. Paragraph 7.6.7 to 7.6.9 provides further detail, notably stating that ‘The height is appropriate in relation to the existing and emerging context and in relation to the spatial hierarchy of the area and the borough, and in relation to the scale of the street and the adjacent public space and DLR infrastructure.’		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/038	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The reduction of the development potential of the allocation site is perverse given the worsening housing need, and is contrary to London Plan Policy D3, which seeks the design-led optimisation of development sites.		Comment noted. . 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.
Reg19-E-173	L&Q		Reg19-E-173/039	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology: • Firstly, Figure 12 seeks to show tall buildings under construction in Newham, however this does not include the L&Q development at LPW, despite the fact that the scheme has been implemented in planning terms (LPA ref: 23/02432/CLE). This fundamentally means that the approach taken to assessing TBZ11 is flawed. In any case, a logical approach would be to identify any extant planning permissions (rather than only sites under construction). This does not appear to have been done		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 positively prepared and justified. Although we acknowledge that the scheme has been implemented in planning terms, it is not built yet. Therefore, permitted heights have not been considered suitable parameters to define the emerging context at this point in time. More details on the methodology could be found in the Tall Building Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/040	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													[The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:] • Secondly, adopted site allocation S20 highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station. Adopted site allocations are identified at Figures 34 and 37, however no detail is provided in respect of established heights for those site allocations, and it is unclear how the existence of existing allocations has informed the study.		Site allocations and areas identified suitable for tall buildings in the adopted Local Plan were part of the criteria for the high-level assessment of suitability for tall buildings in the borough. Whilst adopted site allocations have been considered suitable for tall buildings, the height parameters have been considered on the basis of the local centre hierarchy, the level of accessibility and the prevailing height of the context. More details on the methodology could be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).
Reg19-E-173	L&Q		Reg19-E-173/041	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													[The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:] • Thirdly, TBZ11 is treated differently than the land to the west which is identified as appropriate for heights of up to 50m (with TBZ11 as suitable for 21 – 32m (7 – 10 storeys)), as shown at Figure 42 on Page 61. This approach appears to derive from Figure 26 which shows a different sensitivity rating to TBZ11 compared to the land to the west, although there does not appear to be any justification to support this. Significantly, both areas are identified at Figure 36 as having low sensitivity to change, and in the Townscape Assessment (June 2024) at Page 78 as areas ‘not sensitive to change’.		The Council acknowledges that the land within the TBZ11: Lyle Park West boundary has been identified as low sensitive to change area, and therefore it has been considered suitable for Tall Buildings allocation. However, due to other representations on 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.
Reg19-E-173	L&Q		Reg19-E-173/042	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The draft allocation states that development should address the need for community facilities in the area by delivering new community facilities in Lyle Park Neighbourhood Parade to meet local need, and the Map on Page 381 shows that this would relate to the L&Q site. However, this is incompatible with extant and implemented planning permission 19/01791/FUL, which includes did not include any community facilities, but did include a condition requiring community access to nonresidential floorspace.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/043	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													The layout shown in the Map on Page 381 is not marked as illustrative or diagrammatic, and so it is assumed that the intention is for any development proposals to closely align with these layout principles. This causes issues, as the layout principles shown are incompatible with extant and implemented planning permission 19/01791/FUL, notably areas of green space along the south western site boundary.	It is suggested that the layout shown in the Map on Page 381 is amended to reflect the extant permission at the L&Q site.	A change to this policy approach has not been made. We did not consider this change to be necessary as 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. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/044	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West						No							For the reasons set out above, it is considered that draft allocation is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.	Fundamentally, the evidence base which supports the tall buildings assessment should be reviewed to address the comments raised. As a minimum, the site allocation should enable compatibility with extant consent on the L&Q site. Suggested amended wording: 'Building heights should range between 21 – 32m (ca. 7 – 10 storeys) with taller buildings up to 40 66m (ca. 13 20 storeys) towards the south of the site fronting the river and around the station as part of the Lyle Park Neighbourhood Parade.'	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 positively prepared, justified and effective. Whilst we acknowledge greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the more detailed townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/044a	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West						No								Reference to providing community uses as part of the Neighbourhood Parade should be amended to be compatible with the extant consent on the L&Q site: 'Development should address the need for community facilities in the area by enabling community access to delivering new community facilities in Lyle Park Neighbourhood Parade to meet local need, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies S12 and S13.' The layout shown in the Map on Page 381 should be amended to reflect the extant permission at the L&Q site	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes
Reg19-E-173	L&Q		Reg19-E-173/045	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West						No							L&Q is a major investor and provider of homes in Newham, and notably, we hold new development opportunity at Lyle Park West (within draft site allocation N2.SA2). For the reasons set out in the form, we have significant concerns with the soundness of the draft allocation which warrant discussion.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/014	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					Blank	Blank						Blank	N2.SA2 Lyle Park West site map (page 381) must specifically highlight the adjacent safeguarded Royal Primrose Wharf. In addition, it is noted that the site map shows a key route adjacent to the safeguarded wharf. It is also important to note that there may be a particular challenge in finding the best route for the Thames Path near operational wharves and terminals, and given that to the west of this allocation there is a dedicated industrial area with the two safeguarded wharves, it may not be appropriate for the Thames Path extension to directly come through this area.		Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Newham Sustainable Transport Strategy 2024 recognises the challenges in connecting the Thames Path due to the presence of industrial sites, however, is included to show the aspirations of the council to link the existing Thames Path where possible. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/015	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside					Blank	Blank						Blank	N2.SA3 Connaught Riverside design and layout of the site should take into consideration amenity impacts of, and access to, the Thames Refinery Wharf to ensure development does not compromise its operation.		A change to this policy approach has not been made. We did not consider this change to be necessary as this is a requirement of the site allocation design requirements, and will therefore be effective at controlling amenity impacts. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-178	Royal Docks		Reg19-E-178/003	Neighbourhoods	N2 Royal Victoria	N2.SA4 Thameside West					Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft. However, there are a number of strategic points which we wish to make so I have summarised these below for ease:] <u>Existing Planning Permissions:</u> In some instances, policies on GLAP land (and potentially on other sites) do not reference or mirror the consented, and in some cases implemented, planning permissions. This is particularly the case for Thameside West. This seems problematic to us, especially when some key points already agreed (building heights, land uses, open space, etc) are different in the Plan as compared to the consents.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/004	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays					Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft. However, there are a number of strategic points which we wish to make so I have summarised these below for ease: Existing Planning Permissions:] We strongly urge that the Plan conforms to consented permissions or, in the example of Silvertown Quays (N2.SA1), reflects the current Hybrid Planning Application on which our respective teams (and The Silvertown Partnership) have been working together for nearly two years. It seems to us to be incongruous to have two visions for the same site, both endorsed by the Council.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/006	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance					Blank	Blank						Blank	<u>[Open Space:</u> The Spatial Strategy (BFN1) sets a minimum 2ha Local Parks on the majority of site allocations and there are a series of plans showing indicative locations and arrangement of these spaces. Whilst we accept that the Royal Docks requires more open space, our strong view is that setting arbitrary targets for the open space does not meet the requirements for masterplan-led development (as required in BFN2(1)) as well as creating a risk that the policy hinders a design-led approach. To set a borough-wide minimum without assessing the site specifics could undermine delivery.] This is particularly the case for the Excel Western Entrance site, where the Local Plan allocates then site as a Strategic Site (which is welcomed), but then protects the majority of the site as Green Space, to the extent that the site allocation becomes undeliverable.		A change to this policy approach has not been made. We did not consider a change to be necessary as the need for green space is justified in 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. 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. Newham's Green and Water Infrastructure Study has identified a need for the allocation, N2.SA5 Excel Western Entrance, to deliver a consolidated green space to service nearby residential neighbourhoods. The green space provision should prioritise community growing opportunities. This will be of benefit to residents on the site allocation and the wider neighbourhood. The infrastructure requirements for each allocation set out the green space requirement that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The delivery of the green space will be subject to further masterplanning. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-178	Royal Docks		Reg19-E-178/046	Neighbourhoods	N2 Royal Victoria						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] Characterisation Study – Neighbourhood Design Principles The report says "from 2022, a branch of Crossrail will open". This suggests that the content is over two years old and may not properly reflect the current context. In particular the reference to poor PTAL levels may not be correct.		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 positively prepared. Newham Characterisation Study depicts a point in time evidence base which has informed the Local Plan's spatial strategy and design policies and provides guidance on how the policies should be implemented. Whilst the baseline analysis is based on Public Transport Accessibility Level (PTAL) data available between 2021 and 2022 - when the study has been commissioned - each site allocation provides the base year and the 2031 forecast PTAL data, acknowledging the impact public transport improvement will have on accessibility within the sites. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/047	Neighbourhoods	N2 Royal Victoria						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] Characterisation Study – Neighbourhood Design Principles The report fails to reference the consented and implemented Thameside West and Silvertown Quays developments (8,000 homes consented) despite the changes proposed under the planning permissions. It also incorrectly shows SIL designation on part of the Thameside West site despite the change consented in the Thameside West permission. The evidence base should reflect the reality of consented and implemented projects.		A change to this policy approach has not been made. We did not consider this change to be necessary as while we acknowledge that the site benefits from this planning permission (which can still be built out), the permission does not alter the SIL boundary. The site continues to be designated as Strategic Industrial Location for industrial intensification to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham. More details on the approach taken can be found in the Proposed New Employment Land Designations and Boundary Amendments (2024). The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/002	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance												Background - ExCeL’s Commitment to Newham The proposed redevelopment of the Western Entrance of ExCeL is a pivotal moment in the ExCeL’s aspirations to be the No.1 conference and convention centre in Europe and to be at the forefront of the global events industry. The imminent opening of the 250,000 sq.ft. Phase Three development and the launch of the 160,000 sq.ft Immerse LDN dockside experience, at a cost of £300m, highlights the continued appetite of ExCeL’s owners to invest in the Royal Docks and remain a long time partner of the London Borough of Newham. ExCeL are also extremely supportive of Newham’s need for new housing, showcased by the Joint Venture with Mount Anvil at Royal Eden Dock, where the construction of 854 new homes (including 40% affordable housing) is now scheduled for completion in 2027. We are delighted that the Western Entrance has been acknowledged as a Strategic Site in the Reg 19 draft Local Plan. However, whilst new housing has been identified as a suitable future use, this allocation to also needs to acknowledge our requirement for a new events building and visitor accommodation, within the allocation. Without these additional facilities, internationally significant events would potentially be lost to other national and international venues. The Phase Three development and Immerse LDN are projected to increase visitors numbers by 2.5 million once fully operational, as well as generating hundreds of new jobs. MSOA data suggests that 41% of operational employment in will come from the London Borough of Newham and overall 88% (inc LBN) will go to residents of London. Based on previous research, each visitor spends between £97 and £530 each day when visiting an event. However, the majority of this spend occurs outside the venue. ExCeL’s ability to offer additional visitor accommodation and entertainment opportunities will contribute directly to the objective to retain visitor spend within the Royal Docks locality to further support the Newham economy, in addition to the delivery of new homes and enhanced public realm. The Local Plan Site Allocation has the ability to fully unlock the potential of the Western entrance site and delivery wide ranging public benefits. However, it is important for LBN to understand that the seriously prejudicial wording of the proposed Site Allocation significantly constrains the development potential of the Site to the extent that the intent of	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 outlined in the development principles, namely residential development, community facility and green space, for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan's evidence base. The wording of the site allocation would not preclude other land uses such as cultural uses, main town centre uses and visitor accommodations being delivered but the acceptability of these uses on site allocations will be dependent on whether they meet relevant policy requirements in the Plan. The spatial criteria of visitor accommodation in supporting the ongoing economic function of the Excel Centre is recognised in Policy HS9. Nevertheless, further quality criteria and proof of demand to demonstrate the suitability of the scale of a hotel proposal would also need to be considered at application stage.

LB Newham Response																	Proposed modifications and explanation	
Representor Comment																	the allocation is undeliverable, meaning our clients have halted all pre-application work on the scheme. We have set out below our comments on the Draft Submission Local Plan (Regulation 19) accordingly.	
Complies with Duty to Cooperate?																		
Consistent with the London Plan?																		
Consistent with the NPPF?																		
Effective?																		
Justified?																		
Positively prepared?																		
Sound?																		
Legally Compliant?																		
Implementation text																		
Justification																		
Clause																		
Introduction																		
Site allocation																		
Policy																		
Chapter																		
Comment Reference																		
Agent																		
Representor																		
Representation Reference																		

Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/03	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance												1. Principle of Site Allocation We fully support the principle of the site being given Site Allocation status in the new Local Plan. As set out in the pre-application document dated April 2024 [Appendix 1], the site is at the heart of the regeneration of the Royal Docks and is in a highly accessible location. With the Elizabeth Line and future Silvertown Footbridge, it forms an important node between the Custom House and Silvertown communities. The site also frames ExCeL London’s front entrance and visitor experience. Reimagining the site with a high quality and considered proposal will promote its function as a nodal point connecting neighbouring development and multiplying their success, as well as delivering a number of clear benefits that align directly with the objectives of the new Local Plan, including the following: * Enhancing the existing central arrival point to the Royal Docks that has been unlocked by the Elizabeth Line, creating an environment befitting this important role and furthering its reputation as a world class cultural destination * Beautifully bold and bespoke public realm which is reconfigured and enhanced, focused on a varied & engaging programme of spaces for the existing community, new communities and visitors, celebrating nature and biodiversity. * Improving connectivity between existing and new communities at Custom House & Silvertown, promoting broader community cohesion and equality. * Local opportunity for growth, providing new jobs and training in the heart of Newham, with the potential for continuity of employment and skills impacts linked to the ongoing Royal Eden Docks development. * Improved connectivity with the water to connect users with Royal Victoria Dock, the newly transformed ExCeL London waterfront and surrounding developments * A range of land uses providing activated public spaces throughout the whole day with diverse land uses. Incorporating residential, apart/hotel, entertainment and F&B * Up to c.375 new high quality and energy efficient homes on a major LBN public transport node, including the provision of much-needed low cost affordable housing. * Entertainment and apart/hotel accommodation aligned with the visitor designation objectives for the Royal Docks and supporting ExCeL’s strategic role as London’s largest exhibition venue. Please refer to the pre-application	Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			document in [Appendix 1] for further details of the vision and initial proposals.		
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/04	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													2. Site Allocation: Development Principles – Land Uses The Site has the unique potential to build on the long term success of ExCeL and to further embed the Royal Docks as a visitor destination. It is the right location for ExCeL’s role, function and visitor offer to expand, to ensure continued investment and the ability to attract the best global events and exhibitors. The proposed events building will supplement ExCeL’s existing offer by providing a unique venue for potential immersive experiences and cutting edge exhibitions, for which there is considerable market demand. Likewise, the proposed visitor accommodation allow visitors to the venue to stay locally, spending more time in the Royal Docks resulting in increased local expenditure. These uses are fundamental to maintaining ExCeL’s position as a world leading venue. In turn, these proposed land uses would result in wide ranging planning and public benefits. Likewise, the residential proposals would build on the quality and success of Royal Eden Docks and help the Borough meet it’s housing delivery numbers. From a design perspective, as demonstrated in the pre-application material, these land uses can be delivered alongside a consolidated, reconfigured and improved open space. One that is activated and reflective of it’s function defining the entrance to the ExCeL London venue. Taking the above into account, we consider that the Site Allocation ‘Development Principles’ wording should better reflect the scale of the opportunity, emphasising how the allocation can contribute directly towards the wider Local Plan policy and vision objectives regarding housing delivery, employment, public realm, the Royal Docks as a visitor and cultural destination, and the importance of ExCeL’s strategically important role in achieving this as a major cultural anchor in the Borough.	As a minimum, we consider that the ‘Development Principles’ wording should be amended to reflect the broader range of land uses that can be achieved as part of the Site Allocation, specifically referring to visitor accommodation, cultural/exhibition and food and beverage uses, in addition to residential, as follows (blue = our suggested wording): Residential development, visitor accommodation, cultural/exhibition, food and beverage,community facility and open space.	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 outlined in the development principles, namely residential development, community facility and green space, for the reasons set out within the Site Allocation and Housing Trajectory Methodology 2024 published as part of the Plan's evidence base. The wording of the site allocation would not preclude other land uses such as cultural uses, main town centre uses and visitor accommodations being delivered but the acceptability of these uses on site allocations will be dependent on whether they meet relevant policy requirements in the Plan. The spatial criteria of visitor accommodation in supporting the ongoing economic function of the Excel Centre is recognised in Policy HS9. Nevertheless, further quality criteria and proof of demand to demonstrate the suitability of the scale of a hotel proposal would also need to be considered at application stage.

Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/05	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance		Infrastructure requirements - open space										3. Site Allocation: Development Principles / Infrastructure Requirements – Open space The previous Call for Sites submission (Dec 2021) and the Pre-application document (April 2024) explained 1) the shortcomings of the existing public realm, which is generally underutilised and lacking in legibility and activation; and 2) the opportunities for providing new improved public realm with greater functionality. Expanding on the above, the existing open space has many shortcomings, including: - A lack of activation; - No clear function or programme of uses; - Poorly defined and illegible routes; - Limited biodiversity; - A poor use of space considering it’s size and location; Ultimately the existing space is underutilised and offers little in the way of usable defined amenity for local residents, visitors or the wider community. Whilst we appreciate the space was award winning when originally conceived, the locality has undergone significant change in the last 20 years, meaning the space is now not fit for purpose. There is the opportunity for the redevelopment of the wider site to achieve a much improved and contextually relevant approach to public realm and place making, facilitated by the other land uses proposed. Ultimately the approach to public realm needs to be reflective of ExCel’s function as a major visitor destination and the site location as a key nodal point at the heart of the Royal Docks. Accordingly, we recognise and support the principle of providing enhanced and reconfigured public realm as part of the Site Allocation. However, as drafted the Site Allocation wording is inconsistent and therefore the desired objectives of the public realm design are unclear. The Development Principles state “Development should retain and enhance the existing open space along the waterfront edge. Royal Victoria Square to be reconfigured at the east of the site creating an inviting entrance to the Excel conference centre site”, whilst the Infrastructure Requirements states “Development should protect existing open space and address open space deficiency by re-providing and enhancing Royal Victoria Square Civic Space as a consolidated open space”. Given the contradictions between ‘retain’, ‘protect’, ‘reprovide’, ‘reconfigure’ and ‘consolidate’, the wording as drafted is unclear, with competing objectives which creates uncertainty regarding the development potential of the site and its ability to deliver the broader aspirations of the site allocation. To provide clarity, we suggest the wording should focus on the key objective to reconfigure, consolidate and enhance the open space.	The Council's objective for this policy approach is to deliver green space to address the need as justified in Newham's Green and Water Infrastructure Strategy. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N2.SA5 Excel Western Entrance, to deliver a consolidated green space to service nearby residential neighbourhoods. The green space provision should prioritise community growing opportunities. This will be of benefit to residents on the site allocation and the wider neighbourhood. In addition, the site should provide publicly accessible play space, in the form of a Locally Equipped Area for Play as well as well as a Local Area for Play, which should be playable public realm. The infrastructure requirements for each allocation set out the green space requirement that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The delivery of the green space will be subject to further masterplanning. However, the Council recognises the importance of ensuring the Plan is positively prepared and effective with better clarity on the requirements to protect the quantum and the flexibility of Victoria Square and enhance its function alongside with future development. Therefore, we made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. N2.SA5 Infrastructure Requirements: Development should protect existing open space and address open space deficiency by re-providing and enhancing Royal Victoria Square Civic Space as a consolidated and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

	LB Newham Response	Proposed modifications and explanation	Representor Comment	Complies with Duty to Cooperate?	Consistent with the London Plan?	Consistent with the NPPF?	Effective?	Justified?	Positively prepared?	Sound?	Legally Compliant?	Implementation text	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Agent	Representor	Representation Reference
			Significant design feasibility work has been undertaken over the last two years, as reflected in the pre-application proposals, which indicates that a reconfigured and consolidated open space located towards at the heart of the masterplan, flanked by the proposed new exhibition and residential uses, will maximise the function and design benefits of the space in terms of legibility, activation and connectivity.																			

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/07	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													In addition, we question the compatibility of the various competing functions stated for the open space, which currently include prioritising community growing, as well as publicly accessible play space in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play. We note that the play space is also stated to be ‘in addition to the open space provision’. These stated functions appear to be used generically across the Reg 19 Local Plan when describing the objectives for open spaces. This creates uncertainty regarding the overall quantum of open space that is sought and consequently uncertainty regarding the extent of potentially developable space and the principle of the other land uses sought. Whilst we support the principle of the reconfigured open space accommodating an element of playable public realm, given the unique nature of the site at the entrance to ExCeL London and the gateway to the Royal Docks from the Elizabeth Line at Custom House, we do not think it is appropriate in place making terms for the open space to be dominated by play space and community growing. We suggest that the role and function of this open space is better focussed on the public realm that responds to movement, legibility, places to sit and dwell, for informal food and beverage, biodiversity and landscaping, in addition to informal place. We are concerned that large formal play space would compromise these prioritise and is not appropriate in this context at the entrance to the ExCeL venue.	Taking the above comments into account, we suggest the following amended wording to the ‘Development Principles’ and ‘Infrastructure Requirements’ sections of the Site Allocation: Development Principles ~~Development should retain and enhance the existing open space along the waterfront edge.~~ Royal Victoria Square to be reconfigured at the east heart of the site creating an inviting entrance to the Excel conference centre site. Infrastructure Requirements <del>Development should protect existing open space and address open space deficiency by</del>~~reproviding~~ reconfiguring and enhancing Royal Victoria Square Civic Space as a consolidated open space to the east of the site. The open space provision should prioritise community growing opportunities. ~~In addition to the~~ The open space provision, ~~development should~~ include publicly accessible play space ~~in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play,~~ which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.	The Council's objective for this policy approach is to deliver green space to address the need as justified in Newham's Green and Water Infrastructure Strategy. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N2.SA5 Excel Western Entrance, to deliver a consolidated green space to service nearby residential neighbourhoods. The green space provision should prioritise community growing opportunities. This will be of benefit to residents on the site allocation and the wider neighbourhood. In addition, the site should provide publicly accessible play space, in the form of a Locally Equipped Area for Play as well as well as a Local Area for Play, which should be playable public realm. The infrastructure requirements for each allocation set out the green space requirement that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The delivery of the green space will be subject to further masterplanning. However, the Council recognises the importance of ensuring the Plan is positively prepared and effective with better clarity on the requirements to protect the quantum and the flexibility of Victoria Square and enhance its function alongside with future development. Therefore, we made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. 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 and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/10	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance		Site allocati on map											4. Site Allocation Map – Opportunity for Green Space Taking the above into account, we are very concerned that the graphic representation of the ‘Opportunity for Green Space’ on the Site Allocation Map (page 394) is too extensive and is inconsistent with the wording of the draft Site Allocation which currently states “ <i>Royal Victoria Square to be reconfigured at the east of the site</i> ” ... “ <i>as a consolidated open space</i> ”. Whilst we appreciate that the Site Allocation Map is illustrative and suggests ‘opportunities’ for green space, there is a risk that when interpreted literally the Map would have the effect of preventing and significantly constraining the development potential of the Site Allocation and the other land uses sought, rendering the allocation itself unviable and unable to deliver the actual objectives of the allocation.		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. However, the Council recognises the importance of ensuring the Plan is clear and therefore made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. 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 and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/11	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													The terminology 'Opportunity for Green Space' is also inconsistent with the primary objectives for the reconfiguration, consolidation and enhancement of the space proposed in the Site Allocation,.		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. However, the Council recognises the importance of ensuring the Plan is clear and therefore made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. 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 and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/12	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													We also note that the extent of the ‘Opportunity for Green Space’ is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren’t then identified for any protection/allocation on the Reg 18 Local Plan Policies Map.	We consequently propose that the Site Allocation Map is redrawn based on the alternative version prepared by HTA Architects in [Appendix 2] , which proposes to graphically represent an opportunity for green space that aligns with the intent of the actual Site Allocation wording to locate a reconfigured and consolidated green space and reflects the design rationale underpinning the preapplication proposals. This approach would also be more consistent with that taken on other site allocations, where the scale and location of ‘Opportunities for Green Space’ appear to be better defined.	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. However, the Council recognises the importance of ensuring the Plan is clear and therefore made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. 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 and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/13	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance	Policies Map												Reg 19 Policies Map – Green Space The Reg 19 Policies Map also seeks to designate the majority of the Site Allocation as Green Space. As with the Site Allocation map, the extent of Green Space on the Policies Map is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren’t then identified for any protection/allocation on the Reg 18 Local Plan Policies Map. Given the Site Allocation proposes the reconfiguration and consolidation of the open space, we do not think it is then appropriate for the Policies Map to then designate and protect the entirety of the existing open space as ‘Green Space’. This creates a direct conflict with the intent of the Site Allocation, prejudicing the ability to bring the site forwards for development at all.	As such, we recommend that the Policies Map is updated to the remove the Green Space allocation from the Site in its entirety, consistent with the approach at Reg 18 stage, as the Site Allocation map better serves the purpose of identifying the potential location for the reconfigured and consolidated open space (subject to the amendments we have recommended above).	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. However, the Council recognises the importance of ensuring the Plan is clear and therefore made the following wording changes: N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge-, and reconfigure Royal Victoria Square ~~to be reconfigured~~ at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1. 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 and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/14	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													5. Building Heights The draft Site Allocation currently prescribes building heights ranging between 21-32m (ca. 7-10 storeys) with a taller building up to 40m (ca. 13 storeys) to the west. Please refer to the enclosed Townscape and Heritage Assessment prepared by The Townscape Consultancy in [Appendix 3 - this has been entered into the reps -]. In summary, TTC’s assessment is that the general approach in the Site Allocation, of reinforcing the legibility of the existing street hierarchy and active frontages, locating lower massing towards the designated heritage assets and increasing height to the west of the Site, is sound. However, from a heritage and townscape perspective, there is potential for greater capacity within the Site boundary and additional height beyond that proposed in the Site Allocation. A taller building could result in a more elegant form and better integrate with the immediate and surrounding context, as the pre-application design studies undertaken by HTA suggest. This approach has the potential to ensure that the tallest building can successfully act as a way finder and gateway, optimise the use of the site, and contribute positively to the setting and significance of nearby heritage assets. The assessment identifies that prevailing building heights along Western Gateway have shoulder height buildings of between 7-13 storeys – not limited to 10 storeys - with taller buildings up to 22 storeys – significantly higher than 13 storeys.	Based on an analysis of townscape, building hierarchy and heritage, it is considered that more appropriate building heights for the Site Allocation would be as follows: Building heights should range between ~~21-32m (ca. 7-10 storeys)~~ 21-40m (ca. 13 storeys) with a taller buildings up to 40m (ca. 13 storeys) 60m (ca. 19 storeys) towards the western part of the site . Massing should generally step down towards the east of the site to sensitively integrate with the prevailing height of the context and with the heritage assets.	A change to this policy approach has not been made. We did not consider this change to be necessary as, based on the sieving exercise to identify tall building locations and maximum heights, due to its sensitive location in proximity to heritage asset, this Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights and design principles seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Furthermore, the design principles for N2.SA5 Excel Western Entrance already identifies the western part of the site as suitable location for the tallest element. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/21	Neighbourhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													The Townscape Consultancy has prepared the following representations in response to the consultation being undertaken on the Regulation 19 version of the draft Newham Local Plan. The representations have been prepared with a focus on the potential heritage, townscape and visual impact implications of the emerging policy in relation to the development potential of the Site at Royal Docks Gateway. The Royal Docks Gateway is largely open and consists of hard landscape, a water feature and green space. It is bounded to the north by the grade II listed Warehouse W and Western Gateway, to the east by the ExCel Centre, the south by the waterfront of the Royal Victoria Dock and west by large scale hotel development. The Site is also located within the immediate setting of the grade II listed Warehouse K, as well as four grade II listed cranes to the south along the waterfront. The Site falls within the newly added 'N2.SA5 Excel Western Entrance' site allocation within the Royal Docks character area. In a wider context, it is also located within the Royal Docks and Beckton Riverside Opportunity Area. It is noted within the Newham Characterisation Study (Updated June 2024) that the Royal Docks character area is rapidly changing from its past industrial character to a mixed-use residential one. The allocation has been informed by the findings of the Newham Characterisation Study, and the recently published Tall Buildings Annex (July 2024) by LBN. The Townscape Consultancy has considered the emerging proposals prepared by our clients' architects. Based on our analysis of the Site's townscape and heritage context our findings deviate from the approach considered by LBN to be appropriate. We consider that the Site has greater capacity for height and volume than illustrated in the LBN Local Plan and evidence base, primarily the Newham Characterisation Study and Tall Buildings Annex.	Comment noted.	

Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/22	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance												Overview of the Site context The building of the Royal Docks followed the arrival of the railways in 1846-7. Royal Victoria Dock, which once formed part of the Site, was constructed between 1850 and 1855; the Royal Albert Dock, further to the east, between 1875 and 1880; and King George V Dock, to the south of that, in 1912. They were built to accommodate large cargo ships and liners and were connected by railway. Warehouse structures started to appear in the area during the 1850s and 1860s. The Site and its immediate surroundings at this time formed part of the dock itself as well as two warehouses, H and C, built out on jetties. By the 1950’s most of the historic warehouses had been demolished and the waterfront replaced with modern large scale warehouse buildings. A map from the 1960’s depicts the modern warehouses as extant with railways crossing between them. It also shows one such large scale modern warehouse within the Site boundary and in front of Warehouse W, demonstrating that the site did not feature open space at this time. In recent decades, the character of the wider area around the Site has changed considerably. The Royal Docks, which had been in decline from the 1960s, began to be acquired by the London Docklands Development Corporation (LDDC) from 1981. The quaysides were gradually cleared, and new buildings constructed. It was during this period that the warehouse within the Site was also demolished as part of the wider development of Royal Victoria Docks. In 1998 permission was granted for the ExCel Exhibition Centre, adjacent to the Site, which opened in 2000 and stimulated further growth in the area. The extension of the DLR to the Royal Docks area between 1992 and 1994 (Beckton line) and 2004-2009 (City Airport/ Woolwich lines) were also key catalysts for its development. Large-scale modern residential schemes have been recently constructed on former industrial sites, particularly to the west of the Site. Immediate Townscape The townscape within the vicinity of the Site is varied but includes primarily modern built form of a large scale . The existing building uses include industrial, commercial and residential with buildings ranging from 1 to 22 storeys. To the east of the Site lies the ExCel Centre with a notably large footprint and more dense development to the west of the Site where modern hotel and residential accommodation has been constructed. To the north and south, the remnants of the historic dock yard are situated with the grade II listed Warehouses K and W to the north and cranes to the south along the waterfront. Further to the north, the Railway and Victoria Dock Road serve as a hard barrier between the immediate townscape and the low scale mid-20th century development beyond in Silvertown. Western Gateway is the closest street to the Site and is a secondary street lined with bulky and robust historic warehouse	Comment noted

structures on both sides towards the eastern end. From a public realm perspective, the area is not particularly accessible with rail lines and large roads to the north. Most footpaths are designed to lead pedestrians solely to the ExCel Centre and there is little green space overall.

There are a number of large footprint modern buildings to the north and west, which have residential, and hotel uses. These larger buildings tend to be higher rise. The most prominent include the modern residential development along ExCel Marina, which features a group of buildings ranging from 7-19 storeys and the under construction Western Gateway Phased Development. This building group includes two 14 storey blocks and a taller element of 22 storeys.

Heritage Assets
The Site is within close proximity to a number of grade II listed buildings. To the immediate north of the Site lies Warehouse K and W. Warehouse K is one of the original Tobacco Warehouses Constructed from 1850-55 while Warehouse W was constructed later in the 1860's. Warehouse S, to the west of K, retains its façade however was reconstructed internally to accommodate a hotel and residential use and is not listed. The listed buildings are constructed in stock brick with hipped slate roofs and segmented arch windows. Internally, they retain large open floor areas and aspects of their original structure. Their significance is derived from their architectural and historic interest as they have retained original features and are the last remaining Victorian warehouses of the Royal Victoria Dock. They also derive group value from their proximity, use and age.

Our assessment is that the setting of Warehouse K and W is considered to contribute very little to their significance due to the redevelopment of the surrounding area. The historic setting of the buildings, in close proximity to warehouse structures of a similar use and style, has been largely lost including their relationship to the waterfront, due to the infill of the dock in the 1940's and subsequent closing of the docks in the 1960's. This lack of contribution should be given greater consideration within the site allocation and the subsequent potential for increased capacity of height and volume.

The closing of the docks paved the way for the late 20th century and more recent large-scale developments of the ExCel Centre to the east, associated open/landscaped space which now constitutes the Site, and development to the west all of which are not considered to contribute to the setting of the warehouses. However, the relationship between the remaining Victorian buildings and structures is considered to contribute to the significance of the warehouses where they reveal the historic context of the area and is exemplified by their group value.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			The grade II listed Stothert and Pitt Cranes to the south of the site range in date from 1920-1962 and are constructed in tubular steel. The Historic England list description sets out the significance of the group of cranes as: • This is the most concentrated ensemble of cranes surviving in London's Docklands and the group represents the swansong of the docklands as an industrial area in the 1960s, poignantly redolent of this vanished industry; • Twelve of the cranes are innovative DD2s of 1962, a strikingly modern design in welded tubular steel; • All fourteen are by Stothert & Pitt, the most famous makers of cranes in the world; • Both types are impressive in scale and form and the group has an almost sublime quality, particularly in silhouette. The immediate setting of the cranes to the south along the waterfront is considered to contribute positively to their significance as a direct indication of their use and design within the dockyard. Similarly to the warehouses, the relationship between the remaining Victorian buildings and structures is also considered to contribute to the significance of the assets, where they reveal the historic context of the area, and is exemplified by their group value. However, in other directions their setting is not considered to contribute to their significance due to the infilling of the dock and subsequent modern developments which are at odds with the historic industrial setting of the cranes.		

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

significance. In addition, with regards to green spaces where taller heights are permissible the design should be carefully considered, and height should step down to avoid overshadowing impact.

Within the suitability scoping assessment, the site is identified within three of the seven subheadings including: Areas with buildings consistently above the tall building threshold, Transform areas and strategic sites and Opportunity Areas. The first subheading details that these areas feature emerging residential developments of 7-10 storeys, establishing a new height datum and areas of consistent building heights over 21m are considered in principle suitable for tall building developments. Importantly, within the context of the Excel Western Entrance site allocation, this section states that further analysis is required in each location to establish suitable heights and to ensure a coherent townscape and skyline, indicating that there is flexibility in the assessment conclusions.

Consideration of the emerging policy
While the building heights set out in the N2.SA5 Excel Western Entrance site allocation may sit comfortably within this context, there is insufficient evidence included within the Characterisation Study or the Tall Buildings Annex to preclude other approaches or heights which are based on a more in-depth and bespoke analysis of the Site than these borough wide studies can provide. In particular, the Characterisation Study and Tall Buildings Annex sets out the prescribed heights range based on the proximity and sensitivity of the green space and heritage assets without consideration or assessment of the setting and significance derived from the setting of heritage assets in the nearby vicinity which may be affected by development on the Site, as the NPPF (2023) requires; and there is inevitably no assessment of the design quality of a proposal on the Site. This is a considerable flaw in the Council's analysis.

Paragraphs 200 and 201 of the NPPF (2023) highlight the importance of significance and any contribution of setting in understanding the potential impact of a proposal on that significance. However, as demonstrated above, the setting of the listed warehouse buildings is considered to contribute very little to their significance and has not been identified or explained within the reasoning for the site allocation, demonstrating a contradiction to the existing approach.

In these circumstances, the weight that can be placed on the proposed maximum height of 40m is very limited. It is likely that alternative approaches to height, volume and building form, could be equally or more appropriate in the context of townscape views and the setting/significance of heritage assets, and the emerging policy should be formulated to allow testing of such alternative approaches and site specific analysis.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/24	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													The listed Warehouse K and W are currently experienced in kinetic views along Western Gateway, with tall buildings within their immediate and wider vicinity, including those to the immediate west. The taller massing considered by HTA would step back and away from Western Gateway and the listed buildings to ensure that it would not compete with the historic frontages and immediate settings of the listed buildings. The setting of Warehouse K and W is already defined in part by tall buildings that make a negligible impact upon their significance. The redevelopment of the Site would allow the potential to positively contribute to the setting of Warehouse K and W, in addition to the setting of the adjacent cranes within the vicinity of the Site through a high-quality development which activates and improves upon the existing open space and edges, particularly along Western Gateway.		A change to this policy approach has not been made. We did not consider this change to be necessary as, while we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the N2.SA5 Excel Western Entrance site is not considered appropriate for greater height. The maximum permissible height and design principles seek to preserve the borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/25	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													As mentioned in the overview section of this note, this area of the former Royal Victoria Docks was once dense with large scale warehouses, even after the infilling of much of the dock and replacement with modern buildings in the mid-20th century. In this way, the layout and scale of the adjacent buildings within the site boundary could reinstate a more historic layout. In particular, the addition of a lower rise building to the north could result in a positive addition to the townscape which has the potential to enhance the setting of the Grade II listed Warehouses.		A change to this policy approach has not been made. We did not consider this change to be necessary as, while we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the N2.SA5 Excel Western Entrance site is not considered appropriate for greater height. The proposed prevailing heights and the maximum permissible heights within TBZ21: Excel West designation are considered in line with the prevailing heights of the immediate context and the plan’s aspiration to preserve the spatial hierarchy and a gradual and sensitive transition to the surrounding context, including the designated heritage assets. The impact on heritage assets and their setting will be assessed in detail during the masterplanning and the planning application process. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/26	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													In addition, the HTA design approach has the potential to improve the existing green space and increase permeability through the Site by introducing more active frontages along the waterfront, Western Gateway and the entrance to the ExCel Centre to the east.		Comment noted. The design principles for each allocation set out the requirement that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The detail design of the green space will be subject to further masterplanning.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/27	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													The proposed tallest elements of the emerging proposals would be located to the southwest along the waterfront and would therefore mark the proposed new gateway to the Site. This is in line with the proposed location of a tall building within the N2.SA5 Excel Western Entrance site allocation. The lower elements of the proposal could be located toward the designated heritage assets, ensuring that their sensitive context is preserved and or enhanced. The emerging policy does not include any comparable assessment in setting its arbitrary cap on height at 40m.		A change to this policy approach has not been made. We did not consider this change to be necessary as, while we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the N2.SA5 Excel Western Entrance site is not considered appropriate for greater height. The proposed prevailing heights and the maximum permissible heights within TBZ21: Excel West designation are considered in line with the prevailing height of the immediate context and the plan’s aspiration to preserve the spatial hierarchy and a gradual and sensitive transition to the surrounding context, including the designated heritage assets. As highlighted in the site allocation development principles, proposals on the site are expected to retain the quantity and the functionality of the green space, therefore the most sustainable location for the tallest element is the western part of the site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/28	Neighbou rhoods	N2 Royal Victoria	N2.SA5 Excel Western Entrance													Conclusion TTC’s assessment is that the N2.SA5 Excel Western Entrance site allocation, which includes the Site and encompasses the broad principles set out in LBN’s evidence base is sound. However, from a heritage and townscape perspective, there is potential for greater capacity within the Site boundary and additional height beyond that proposed in the allocation.	A taller building could result in a more elegant form and better integrate with the immediate and surrounding context, as early design studies undertaken by HTA suggest. This approach has the potential to ensure that the tallest building can successfully act as a way finder and gateway, optimise the use of the site, and contribute positively to the setting and significance of nearby heritage assets. The emerging policy should therefore be reviewed and updated to accommodate more appropriate building heights (21-40m (ca. 13 storeys) with taller buildings up to 60m (ca. 19 storeys) as set out in this note.	A change to this policy approach has not been made. We did not consider this change to be necessary as, while we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the N2.SA5 Excel Western Entrance site is not considered appropriate for greater height. The proposed prevailing heights and the maximum permissible heights within TBZ21: Excel West designation are considered in line with the prevailing heights of the immediate context and the plan’s aspiration to preserve the spatial hierarchy and a gradual and sensitive transition to the surrounding context, including the designated heritage assets. The impact on heritage assets and their setting will be assessed in detail during the masterplanning and the planning application process. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/051	Neighbourhoods	N2 Royal Victoria			Up to 50 (depending on precinct)											Buildings or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right-hand column. Developments above ground level may need to be subject to an independent IFP assessment.	Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: • N2.SA1 Silvertown Quays: Any development • N2.SA2 Lyle Park West: 40m AGL • N2.SA4 Thameside West: Above 40m AGL • N2.SA5 Excel West: Above 27m AGL • Royal Victoria: Above 50m AGL	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [18. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/006	Neighbourhoods	N2 Royal Victoria														TSP welcomes the retention of a site allocation for Silvertown which has featured in all drafts of the emerging Local Plan. The allocation confirms its status as a strategically important development site in the Borough. TSP generally supports the updates made to the Vision (N2) for Royal Victoria to provide stronger references to the delivery of a Local Centre at Silvertown. The changes to make the vision for the Local Centre less prescriptive in terms of floorspace is supported. There remains reference to Impact Assessments for retail uses in the wording of the Vision. As part of the HPA, TSP have undertaken Impact Assessments to support the application which are considered to have fulfilled this expectation. In summary TSP supports the Vision for Royal Victoria contained in the draft Local Plan. Detailed representations on the emerging Site Allocation are set out as follows, aligned to each section of it.		Support noted. Individual responses are provided to the more detailed representations made on the emerging site allocation.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/007	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays													The Map is not aligned with the longstanding HPA Illustrative Masterplan for Silvertown in respect of the location of the Local Centre and the layout of open spaces. The HPA proposals for Silvertown have been subject to several years of engagement with LBN, including its Design Review Panel, the GLA, and wider specialists including Urban Shape. The focus of town uses within the Silvertown proposals covers a larger area than shown, expanding west (to Silvertown Avenue in the Masterplan) and north to Mills Quarter. Much of these town centre uses already have full Planning Permission and could be implemented under the OPP.	To be accurate, the Site Allocation map should reflect the Illustrative Masterplan for Silvertown, which it currently does not do. It is essential that the Map is amended to align it to the HPA proposals.	A change to this policy approach has not been made. We did not consider this change to be necessary as 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. Silvertown Local Centre’s boundary extension has been reviewed at Reg 19 in light of progressing development and further masterplanning work as shown in the Town Centre Network Review Methodology Paper Update (2024), p.9-10. As stated in the evidence base document, we recognise that negotiations on the quantity, type and location of the town centre are still ongoing and that the boundary of the local centre could be subject to further review during the masterplanning process. The site allocation map and the policies map reflect the location of the local centre extension broadly in the location proposed at that point in time in the design process and it recognises the benefit of the pedestrian and cycle link proposed in the planning application (22/03046/FUL) in the delivery of the site. The size of the local centre extension area reflects a proportional approach to apportionment of the retail need in the area as identified by the Retail and Leisure Study (2022). The Council believes that the placemaking and activation objectives of the site’s key routes can be achieved by other means than just through main town centre uses, and this is set out in the site allocation principles. The amount of green space is informed by the Newham Green and Water Infrastructure Strategy. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/008	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Development Principles												TSP agrees with the broad messaging of the Development principles of the Site Allocation in terms of the land uses that should be delivered on Site, in that the HPA is aligned to the expectation to provide residential, employment uses, main town centre uses and social infrastructure, including community facilities, sports and recreation facilities, education, and open space. The latest draft development principles include new wording which requires proposals to “prioritise industrial floorspace” on site. The current Local Plan site allocation does not include this requirement, and nor did the Regulation 18 drafts of the Local Plan. The Illustrative Masterplan for Silvertown includes industrial floorspace in the proposed ‘Silverworks’ district to the east of the Site. This proposal supports the delivery of a balance of uses across the site and is important to the placemaking principles for Silvertown.	However, in the absence of any supporting justification for the inclusion of wording that requires proposals to prioritise industrial floorspace on site, we do not consider that it is necessary for there to be a specific requirement to prioritise industrial floorspace over other uses, and propose that this wording is removed while retaining industrial use as one of several employment uses that are welcome on site as part of a balance of uses across it. This request is reflected in our proposed amendments to the site allocation contained at Appendix A. It is a key need for the project to maintain flexibility of permissible land uses in order to maintain momentum of delivery as market cycles change. The HPA enables this with its proposed minimum and maximum parameters to be controlled by condition, and the site allocation should align to the proposed HPA area schedule, which does not advocate a minimum industrial floorspace allowance.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations identify the priority employment floorspace needs for industrial use to address the borough’s needs on industrial floorspace as identified in the Employment Land Review (2022). The wording of the site allocation would not preclude employment uses other than the priority uses being delivered. However, proposed use deviated from the priority uses will need to be sufficiently justified by economic evidence in the submission as required in Policy J1. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/009	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Development Principles												The reference to a need for the new Silvertown Local Centre to provide a food store is supported, and it is noted that an impact assessment for this food store forms part of the HPA documentation.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/010	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Development Principles												The reference to support for community facilities is welcomed.	It is considered that should not solely relate to the Local Centre as community facilities are not always 'town centre uses' and are proposed across the Silvertown site, as part of the placemaking strategy for it. For example, the proposed Primary School location in the Illustrative Masterplan is not within the Local Centre on site.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides a range of flexibilities in the location of social infrastructure across its policies, and the Plan applies in the round. Social Infrastructure is defined under the respective chapter, and recognises that not all such uses would fall under the main town centre uses definition of the NPPF. For example, Policy SI4.5, which directs the location of new schools, does not make reference to the town centres network specifically, yet the accessibility criteria may in certain circumstances align with a high street location. Similarly, policies HS1.3 and HS2 support diversification of Local Centres to include uses that are not within Use Class E or otherwise a main town centre uses, where need is identified and the vitality and viability of the centre is not affected.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/011	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Development Principles												The reference to support for the delivery of sport and recreation facilities is also welcomed.	should not be restricted to only water-related uses because there is a benefit to delivering a range of sport and leisure uses on site for future residents and the wider Royal Docks community. An example of this is the proposed sports pitches within the Illustrative Masterplan. The support for food and beverage uses around the water is welcomed.	Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation N2.SA1 has not been identified as a location which needs to deliver general sporting facilities. However, its location adjacent to the Royal Victoria Dock means that, as identified in Newham's Built Leisure Needs Assessment, sports and recreation facilities in the form of water-related and water-dependent activities will be supported in this location. These uses may be supported by small-scale ancillary uses such as food and drink uses around the water and your support for this element is noted. Policy GWS1 addresses the need to protect and deliver playing pitches. Implementation text GWS1.1, explains that Newham's Playing Pitch Strategy sets out the need for playing pitches over the plan period. We will have regard to Sport England's Sports Pitch Calculator and the findings of the Playing Pitch Strategy to determine an appropriate amount and type of contribution or provision of playing pitches with new residential development. For large-scale residential development, it may be considered appropriate to seek on-site provision of sports pitches. The implementation text goes on to state that where new pitches are determined as being required, consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing facilities. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for the relevant sports. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/012	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Design Principles												The policy text states that building heights should range between 21-32m (ca 7-10 storeys) with some buildings being as tall as 50m in height (c. 16 storeys). It is assumed that these heights are measured by reference to Above Ordnance Datum (AOD) but this should be confirmed.	It is necessary to include the word “generally” prior to the height range, to acknowledge that there will be some buildings that fall outside of this range, such as Plot 6 (under construction) and the three storey townhouses in Plot 2D (part of the detailed component of the HPA), which are all below 18m in height, and taller buildings which are expected by the design principles. The maximum height should be increased to 55.9m AOD as this is the maximum height of the approved proposals for Millennium Mills, which will be the tallest building on Site.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. However, the Council acknowledges that consents have been granted to buildings at a greater heights of the maximum permissible heights, and that those buildings can still benefit from existing consent. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and the Tall Buildings Topic Paper (2025). In relation to height measurement, the maximum height parameters are measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements) as per policy D4.1. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/013	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Design Principles												References to the location of Main Town Centre uses should continue to refer to North Woolwich Road.	Reference should also be added to expanding up to Millennium Mills across the west of the Site, which is in accordance with the longstanding proposals for Silvertown which have been subject to extensive consultation as part of the development of the HPA. There should be no reference to industrial workspace or creative production maker space uses being located towards Millennium Mills. This has never been part of the proposals for the Site, which includes industrial uses to the east in ‘Silverworks’ in the Illustrative Masterplan, and there is no evidence to support this requirement. Millennium Mills is proposed to be used as a flexible workspace with ancillary active uses, but not for industrial purposes.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations identify the priority employment floorspace needs for industrial use to address the borough’s needs on industrial floorspace as identified in the Employment Land Review (2022). The wording of the site allocation would not preclude employment uses other than the priority uses being delivered. However, proposed use deviated from the priority uses will need to be sufficiently justified by economic evidence in the submission as required in Policy J1. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/015	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Infrastructure Requirements												The HPA commits to providing 10sqm of playspace per child resident on site as part of the open space provision, but the details of this will be subject to detailed design and the site allocation should not refer to specific types of play space as the current draft site allocation does (Locally Equipped Area for Play / Local Area for Play).		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/016	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Infrastructure Requirements												[Referencing emerging policy W3 in the context of the site allocation] With regard to the proposed requirement for a vacuum waste collection system, emerging policy W3 Part 8 states that vacuum waste collection systems should be discussed at an early stage of design with the waste and recycling team and is not a requirement. This has not occurred at Silvertown Quays in respect of the HPA, which does not have a proposal for a vacuum waste collection system, and therefore references to this should be removed.		This wording change is not supported. We did not consider this change to be necessary as 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 scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/017	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Infrastructure Requirements												The HPA proposes land for the delivery of a Primary School of up to four forms of entry, in accordance with the emerging Site Allocation. Likewise, a significant allowance for early years childcare forms part of the HPA.		Comment noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/018	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays	Infrastructure Requirements												TSP supports the expectation that a contribution is made towards the upgrade of Pontoon Dock Station, and has expressed its desires that any financial contributions made to Transport for London as part of a future Section 106 Agreement prioritise this project. At Appendix A, we have included a track changed version of the proposed site allocation reflecting the above comments.		Support noted. A separate response has been provided to The Silvertown Partnership LLP regarding the suggestions in Appendix A for site allocation N2.SA1.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/075	Neighbourhoods	N2 Royal Victoria	N2.SA1 Silvertown Quays														
																		The main representations address TSP’s key strategic comments on the proposed site allocation. These result in the following proposed track changes to the development principles, design principles, infrastructure requirements and phasing and implementation text:	Development principles Residential, employment uses, main town centre uses and social infrastructure, including community facilities, sports and recreation facilities, education, and open space. The employment uses should be consistent with Local Plan Policy J1 ~~and prioritise industrial floorspace in the form of workspace for cultural and creative production maker space and warehousing and distribution uses.~~ The type and quantity of main town centre uses should extend and complement existing provision at Silvertown Local Centre, and should remain consistent with a local centre designation and Local Plan Policy HS1. The site should also provide a small to medium sized food store to meet local need, subject to passing the Impact Assessment. Development should address the need for community facilities in the area by delivering new community facilities ~~in Silvertown Local Centre~~, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3. Sports and recreation facilities including in the form of water-related and water-dependent activities will be supported. These uses may be supported by small-scale ancillary uses such as food and drink uses around the water. Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023). Design principles The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should generally range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to ~~50m-55.9m AOD (ca. 16 storeys).~~ Massing should step down towards the south west of the site to sensitively integrate with the low rise context on Mill Road. The location of frontages and public realm as part of the extension to Silvertown Local Centre should help create a continuous centre by connecting to the existing designated Primary Shopping Area at Admiralty Avenue, via Pontoon Dock DLR Station and surrounding public realm on North Woolwich Road to the River Thames. Main town centre uses should be located towards the west of the Site between Millennium Mills and North Woolwich Road ~~with the industrial workspace for cultural and creative production maker space located towards Millennium Mills.~~ Development should conserve and enhance the locally listed Millennium Mills and Grade II Silo D, which is on the Heritage at Risk Register, and their	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations identify the priority employment floorspace needs for industrial use to address the borough’s needs on industrial floorspace as identified in the Employment Land Review (2022). The wording of the site allocation would not preclude employment uses other than the priority uses being delivered. However, proposed use deviated from the priority uses will need to be sufficiently justified by economic evidence in the submission as required in Policy J1. The Council is satisfied that the plan remains sound without the proposed changes.

settings, in accordance with Local Plan Policy D9.

The layout of the site should increase access to the water, create high quality, green public realm along the dock edge and maintain the open character of the water and protect the Site of Importance for Nature Conservation. Water-related and water-dependent activities should activate the water at Pontoon Dock.

The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Routes through, and to and from, the site should improve access and connectivity across the dock, along the dock edge, to the DLR station and to Royal Wharf. Separate HGVs and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the employment uses. Greenspace provision should enhance connectivity north to south and connect the site to Thames Barrier Park.

Design measures should minimise exposure to poor air quality on North Woolwich Road and Connaught Bridge.

The layout of the site should take account of the noise contours across the site, the Public Safety Zone and the Operational Limitation Surfaces from London City Airport and design measures should minimise exposure from the airport. The design and layout of the site should take into account the existing on-site sewer.

The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.

Infrastructure requirements

Development should address open space deficiency by providing ~~a consolidated local park~~ **publicly accessible open spaces** with a minimum combined area of 2 hectares to service nearby residential neighbourhoods. ~~The open space provision should prioritise community growing opportunities.~~

~~In addition to~~ **As part of** the open space provision, development should provide publicly accessible play space ~~in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play~~, which should ~~be~~ include playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.

Development should provide a new bridge connection across the dock to Custom House.

~~Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8.~~

Development should provide **land for the delivery of** a primary school with early years childcare provision in accordance

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				with Local Plan Policy S14. Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access. Phasing and implementation Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades, which will need to reflect the cumulative impact of significant quantities of development in this location. This requires early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. Impact from the existing on-site sewer on design and layout should be taken into account at the preapplication stage through early engagement with Thames Water. Short to long term. In addition, the following detailed amendments are requested in relation to the factual tables (p.376): •Site area – the site area should be amended to align with the area of the red line boundary for the current hybrid planning application, which is 28.8ha. •Public transport accessibility level – per the Transport Assessment submitted with the hybrid planning application, the future PTAL for the site is expected to be 3-4 and therefore we would advocate the inclusion of “(projected increase to PTAL 3-4)” for context.	
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/21	Neighbou rhoods	N2 Royal Victoria			Part 1											Draft Neighbourhood Policy N2 (Royal Victoria) includes a proposed requirement at Part 1 for development “to be of a finer urban grain, with smaller block sizes allowing for more routes though”. This should be amended to confirm that it refers to residential or residential mixed use development only. This is to reflect the coarser grain of industrial development and the particular security requirements for data centre development, which would preclude the same level of permeability.	Recommendation 7: Amend draft Policy N2 Part 1 to add confirm this only applies to residential or residential mixed use development. Suggested track changes to policies: N2 1: requiring residential or residential mixed use development to be of a finer urban grain, with smaller block sizes allowing for more routes though;	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is justified. The Newham Characterisation Study identifies that this neighbourhood has poor pedestrian and cycling environments, largely resulting from the urban morphology of the area. The Council is satisfied that the Local Plan remains sound without this change.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-218	IXDS	RPS	Reg19-E-218/050	Neighbou rhoods	N2 Royal Victoria		Vision				Yes	No						Yes	As per representations made by IXDS Ltd on other policies, to ensure consistency with the emerging requirements of the draft NPPF (2024) and in recognition of the ‘Critical National Infrastructure’ (CNI) classification that now applies to data centres in the UK (as per the press release [see hyperlink in representation document] from the Department for Science, Innovation and Technology on the 12th September 2024), land for data centres should be identified or safeguarded through spatial designations within the Local Plan. As such, the vision for the Royal Victoria neighbourhood (at pages 374 - 375 of the Local Plan) should include the safeguarding of the Former Paint Factory and Central Thameside West site where a data centre development was approved under planning application reference 23/01967/OUT.	Key to modifications: Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N2: Royal Victoria Vision Royal Victoria will be transformed into a unique, cohesive and lively city neighbourhood and will benefit from a high level of growth, delivered through the transformation of key sites at N2.SA1 Silvertown Quays, N2.SA2 Lyle Park West, N2.SA3 Connaught Riverside and N2.SA4 Thameside West, which make the most of the water and that complete and knit the neighbourhood together. The neighbourhood’s industrial land will be intensified and will provide new jobs in a greener local economy. The neighbourhood will continue to be home to a successful mix of uses including new housing, employment uses, visitor attractions and community facilities, as well as City Hall. It will benefit from public transport improvements, including a new DLR station and a new bridge to connect the two sides of the dock. New housing will be supported by a series of thriving, vibrant and diverse local centres at Silvertown, Thameside West and Connaught Riverside and a neighbourhood parade at Lyle Park West providing a local retail, data and digital economy, leisure, services and community facility offer.	This wording change is not supported. We did not consider this change to be necessary as it is too detailed to be included in the neighbourhood vision. Data centres are considered an employment use and the inclusion of new employment uses within the neighbourhood is already well recognised in the vision. Moreover, it is clear that our local plan should proceed based on the December 2023 NPPF following the transitional arrangement. 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 remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/051	Neighbou rhoods	N2 Royal Victoria			8			Yes	No						Yes	[As per representations made by IXDS Ltd on other policies, to ensure consistency with the emerging requirements of the draft NPPF (2024) and in recognition of the ‘Critical National Infrastructure’ (CNI) classification that now applies to data centres in the UK (as per the press release from the Department for Science, Innovation and Technology on the 12th September 2024), land for data centres should be identified or safeguarded through spatial designations within the Local Plan. As such, the vision for the Royal Victoria neighbourhood (at pages 374 - 375 of the Local Plan) should include the safeguarding of the Former Paint Factory and Central Thameside West site where a data centre development was approved under planning application reference 23/01967/OUT.] Further to this, the policy text for N2 should explicitly refer to the Former Paint Factory and Central Thameside West site being safeguarded for digital and data economy uses.	[Key to modifications: Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N2: Royal Victoria] The vision for Royal Victoria will be achieved by: ... 8. intensifying the neighbourhood’s industrial land, through increasing capacity at N2.SA4 Thameside West and through the delivery of a diverse range of modern industrial uses across the rest of the Strategic Industrial Location, including wharf related functions and requiring digital connectivity and digital innovation and technology as part of modern industrial development , including at the Former Paint Factory and Central Thameside West site and encouraging further such development within the locality; ...”	This wording change is not supported. We did not consider this change to be necessary as it is too detailed to be included in the neighbourhood vision. Moreover, it is clear that our local plan should proceed based on the December 2023 NPPF following the transitional arrangement. 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 remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/48	Neighbourhoods	N2 Royal Victoria														Neighbourhoods – N2: Royal Victoria Ballymore supports the vision of the N2: Royal Victoria Neighbourhood policy for it to be “transformed into a unique, cohesive and lively city neighbourhood and will benefit from a high level of growth, delivered through the transformation of key sites”.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/49	Neighbourhoods	N2 Royal Victoria														Ballymore also supports that the vision notes “the neighbourhood will continue to be home to a successful mix of uses including new housing, employment uses, visitor attractions and community facilities, as well as City Hall”.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/50	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													Ballymore further supports that Policy N2 reflects the London Plan 2021 and the Adopted Royal Docks and Beckton Riverside Opportunity Area Planning Framework; and the transformation of Knights Road under site allocation N2.SA2 ‘Lyle Park West’.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/51	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West													However, Ballymore objects the inclusion of “in accordance with the North Woolwich Road, Lyle Park West, Excel West and Canning Town Tall Building Zones and London Plan Policy D4” within part 4.	As set out within our response to Policy D4 Tall Buildings (above) and our response to the N2.SA2 Lyle Park West allocation (below), Ballymore requests that the reference to tall building zones is removed from part 4 if the wording of Policy D4 is not amended.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this change would undermine the delivery of policy D4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/52	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		13											Ballymore supports the approach to improving conditions for walking, cycling & public transport, air quality, mitigating noise impacts of the airport, education provisions and the inclusion of sports-lit multi-use games area at N2.SA2 Lyle Park West. However, Ballymore requests further detail on part 13 of Policy N2, which notes “the opportunities to increase biodiversity, including the extension of Lyle Park and new parks at N2.SA4 Thameside West and N2.SA1 Silvertown Quays”.		Support noted. Clause 13 of Policy N2 requires development in the Royal Victoria neighbourhood, in line with Policy GWS3, to contribute to nature recovery in Newham by protecting and enhancing biodiversity. Policy GWS3 sets out a range of measures required to help achieve this over the Plan period. This includes maximising opportunities to create new onsite habitats and to deliver missing ecological links (green and water). The latter part of clause 13 of Policy N2 stipulates the sites in the neighbourhood where improvements to biodiversity should be delivered.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/53	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Development principles											Site Allocation N3.SA2 Lyle Park West Development Principles Ballymore supports the redevelopment principles set out within the site allocation for of “Residential, employment uses, open space, main town centre uses and social infrastructure, including community facilities”. This mirrors its ambitions for a residential-led mixed-use development on the site.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/54	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Development principles											It is important to note, however, that there is a mix of ownership within the site allocation boundary. While Ballymore is the majority landowner, sections of the site are owned by London Borough of Newham and third-party ownership (in proximity to West Silvertown Station). This makes bringing forward a comprehensive masterplan extremely challenging compared to if all the land was in one ownership. This is integral to understanding and realising what can come forward on the site and when.	Ballymore therefore proposes that the site allocation should acknowledge that redevelopment of the site should come forward in phases in accordance with a comprehensive masterplan for the site.	A change to this policy approach has not been made. This change is not considered to be necessary as the site allocations have been positively prepared. 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 ~~delivery~~ development 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. 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. 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. 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, including how this relates to any proposed phasing of the site. Where relevant, sites should be supported by a realistic phasing plan. Which is included in the modification table.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/55	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principles											

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					parts of the site, thereby generating one or more new shopping small scale frontages alongside the necessary centre/ parade . A clear justification will be required for the benefits of this approach compared to clustering of uses in the centre designation only, and should not result in additional retail or leisure floorspace being provided on site (i.e. the cumulative site-wide quantity is justified by local catchment need, through the Impact Assessment). Further expansion of main town centre use floorspace for ground floor frontage activation will normally not be supported. Where acceptable in principle, new small scale frontages should also meet the criteria set out in part 4 of this Policy. The Newham Characterisation Study (2024) Borough-wide Design Principles chapter includes further design recommendations (primarily under section 9.2.1 ‘Provide Local Uses That Support 15 Minute Neighbourhoods’) that should be imbedded in the design brief when new shopping small scale frontages are proposed.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/56	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principl es											In terms of the employment floorspace, Ballymore supports this being located on the west of the site to create a buffer. However, as aforementioned, it is considered that there should be an opportunity to support co-location here, subject to it meeting the agents of change test and ensuring residential amenity.	We therefore request that the allocation is updated to state “ non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer, however, other forms of stacking including co-location may be considered appropriate subject to a detailed design review ”.	A change to this policy approach has not been made. We did not consider this change to be necessary as our Characterisation Study concluded that vertical co-location would not be suitable for buffering frequent heavy vehicles and ‘dirty’ uses within Strategic Industrial Location. Non-residential stacked industrial building is considered as the most appropriate typology at this site to provide a buffer, and provide employment capacity to meet the imminent industrial demand in the borough as evidenced by the Employment Land Review 2022. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/57	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principl es											As set out in respect of Policy D4: Tall Buildings, Ballymore strongly objects to the heights set out within the allocation. The height has decreased since the Regulation 18 consultation, and again in comparison to the Adopted Local Plan. A significant body of work has been undertaken to masterplan and design the site as well as testing heights as part of the forthcoming planning application. These have shown that taller buildings are acceptable in townscape and heritage terms on the site. The heights reflect the datums of Deanston Wharf and Royal Wharf which have been delivered by Ballymore and show their commitment and long-term stewardship to the Royal Docks. We suggest that the allocation provides an opportunity to deliver additional height where it can be demonstrated that this is appropriate (in terms of high-quality design, environmental impacts and residential quality etc), particularly along the riverfront and at other key locations across the site. This would also be in character with existing tall buildings along the river in the neighbouring Royal Wharf and Deanston Wharf developments. As such, we contend that the indicative heights within the draft site allocation should be updated to reflect the adopted allocation, which will allow any forthcoming development at the site to optimise the delivery of homes, in a form which reflects the established pattern of development across the strategic riverfront sites in this part of Newham.	The heights on the site should be increased as per our comments for Policy D4.	A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that pre-application discussions have been held with LBN officers, that greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the discussions are informed by the adopted Local Plan. The more detailed townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), and the agent of change principle raised at regulation 18 from the adjacent Strategic Industrial Location (SIL) industrial operator, demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL. Therefore, the maximum height parameter on TBZ11: Lyle Park West and N2.SA2 Lyle Park West has decreased at regulation 19 to ensure the existing adjacent SIL is protected and enhanced in line with policy J1. More details on the methodology could be found in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/58	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principles											Infrastructure Requirements Ballymore objects to the requirement for an extension to Lyle Park. A significant amount of open space is provided as part of the forthcoming development.). Furthermore, the landscape architects, Gillespies, have liaised with the London Borough of Newham Parks Teams to discuss the enhancement to Lyle Park by way of a Section 106 Agreement. This will provide a significant increase and upgrade in the amount of open space available therefore it is not considered necessary to extend Lyle Park to the north to improve the gateway to the park as works will be undertaken to do so. The extension of Lyle Park should not be a pre-requisite and should be an option depending on the masterplan that comes forward, which policy should recognise.	The policy should be updated to “providing an extension to the northern section of Lyle Park where necessary and feasible subject to other open space provision set out within the masterplan”.	A change to this policy approach has not been made. We did not consider a change to be necessary as the need for additional publicly accessible green space is justified in 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. 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. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N2.SA2 Lyle Park West, to address open space deficiencies and improve the quality and functionality of Lyle Park by providing an extension to the northern section Lyle 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 the form of a Neighbourhood Equipped Area of Play as well as play space in the form of a Local Area for Play, which should be playable public realm. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/59	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principl es												Furthermore, the opportunities for green space as shown on the indicative site allocation plan should be shown as indicative and as per Policy D3 should be part of a site specific design led approach to optimise the best use of land and capacity rather than prescribing the location of open space on the site.	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for the site to address green space deficiencies and improve the quality and functionality of Lyle Park by providing an extension to the northern section Lyle Park is justified by up to date evidence, through Newham’s Green and Water Infrastructure Strategy. Increasing public access and the functionality of existing green space across the neighbourhood a key part of the N2 Royal Albert North neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GWS2 and GWS3 which provide further detail on access to green space. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/60	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West		Design principl es											The location of the open space on the plan also contradicts the provision to provide an industrial buffer on the west of the site.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as 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. The amount of green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/61	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													Site Allocation N3.SA3 Connaught Riverside Ballymore submitted a hybrid planning application (currently live) in September 2021 which covers the southern portion of the Connaught Riverside site allocation, seeking to deliver an employment buffer building along the eastern boundary of the site, alongside 1,610 new homes, a new Primary School and public open space (application reference 21/02450/OUT). Ballymore are currently in the process of resubmitting this application, which will contain largely the same development principles whilst addressing viability improvements and new legislation surrounding fire safety. Following this submission, application reference 21/02450/OUT will be withdrawn.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. It is noted that this site does not have planning permission and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/62	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													We support the continued allocation of the site, and the overarching development principles requiring a residential development, with industrial and employment uses, alongside open space, community and education facilities and main town centre uses.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/63	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													However, we do have significant concerns regarding a number of aspects of the site allocation which directly conflict with the currently live 2021 application, and the 2024 re-submission planning application to be submitted. The 'live' planning application on this site was submitted in September 2021 following extensive pre-application engagement with the Council and local community, including six presentations to the Council's DRP, seven pre-application meetings with Officers and three pre-application meetings with the GLA. We note that a number of key principles established through the planning application and agreed with Officers through pre-application discussions have now been reflected within the draft site allocation.		Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. It is noted that this site does not have planning permission and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/64	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													As set out above, we support the designation of the site as a local centre, and the allowance for the provision of a medium sized food store which is missing from the surrounding area (and was one of the most raised issued by residents through our public consultation).		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/65	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													However, regarding the requirement for commercial unit sizes to be (majority) between 80-150sqm, we suggest that greater flexibility is further clarified within the policy wording to require a range of unit sizes, which are suitable for small and medium businesses, and does not directly reference floorspace requirements.		A change to this policy approach has not been made. We did not consider a change to be necessary as the policy has already been amended from Reg 18 to Reg 19 to provide flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores also now allows for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/66	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													In regard to building heights, we support the recognition that the site can accommodate tall buildings but suggest the wording around maximum heights is amended to be more flexible to allow developers to demonstrate that additional height is appropriate above the indicative maximum, particularly as the currently live 2021 application includes buildings of up to 18 storeys which the Council had previously not objected to. It is further noted that the neighbouring ‘Tradewinds’ development, located at Wards Wharf Approach, has been previously approved for flatted development in the form of 4 connected buildings - two at 7 storeys, one at 8 storeys and the last at 19 storeys in height.		A change to this policy approach has not been made. We did not consider this change to be appropriate as policy D9 in the London Plan 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Whilst we acknowledge that the applicant could benefit from planning consents under the current 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. More details on the methodology used to identify suitable locations and height 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.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/67	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													Policy H9 identifies that large houses in multiple occupation (sui generis) or large-scale purpose-built shared living (LSPBSL) developments should be directed to town and local centres or along major roads well connected by public transport. Site Allocation N3.SA3 is proposed, in portion, to be a Local Centre and is well connected by North Woolwich Road, as well as nearby stations such as Pontoon Dock, London City Airport and West Silvertown. A range of bus stops are located along Albert Road leading to central London and wider nearby areas. Therefore, LSPBSL should be considered suitable under the proposed uses identified for the area.	Ballymore would also suggest the use of alternative accommodation to be accounted for within Site Allocation N3.SA3 Connaught Riverside.	A change to this policy approach has not been made. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/68	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside													We would also suggest that, where LSBPSL forms part of a wider, larger development including a high proportion of traditional C3 dwellings, there is an option to provide increased affordable housing within such units thereby reducing the affordable housing contribution required and ensuring the development as a whole includes a greater proportion of traditional and family sized affordable units.		A change to this policy approach has not been made . We did not consider this change to be necessary as Policy H9.3a requires affordable housing provision to be provided in the general needs tenures, where large-scale purpose-built shared living is being delivered as part of a wider mix of tenures. The Council is satisfied that policy is effective, and that the plan remains sound without the proposed changes.
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/010	Neighbourhoods	N2 Royal Victoria	N2.SA4 Thameside West					Blank	Blank						Blank	Silvertown tunnel 1.19 Royal Greenwich supports the continued development of the Silvertown Tunnel and co-operation with the London Borough of Newham on any applications relating to the tunnel and designation.		Support noted.
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/004	Neighbourhoods	N2 Royal Victoria			10			Blank	Blank						Blank	Neighbourhoods and Site Allocations N3 Royal Victoria TLS would like to pull out an important point perhaps missed in our previous representation “The vision for Royal Victoria will be achieved by.... 10. managing the transition between industrial and non-industrial uses through careful master planning, design and the delivery of modern industrial premises;” Point 10 seems to be at least missing some text.	TLS would suggest it read as follows: “10. managing the transition between industrial and non-industrial uses through careful master planning, design and the delivery of both new residential developments and modern industrial premises;” This reflects the fact that a greater quantity of new residential led developments is expected in the area and there is pre-existing longstanding significant industry, including within SIL.	This wording change is not supported. We did not consider this change to be necessary as wording has already been updated in the Regulation 19 Local Plan for clarity. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/006	Neighbourhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					Blank	Blank						Blank	TLS strongly support both the extension of the industrial buffering South towards the river and the filling in of the gaps in the buffer building. We also strongly support the more detailed text clarifying that “stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses”. Further we strongly support the recognition of the safeguarded wharves and additional text to protect these. We note the addition of a wavy red line marking a “Sensitive edge (noise - pollution - infrastructure).” This is a very wise addition as it sets reasonable expectations and removes supposed ambiguity for future residential led developments over the character of the area that must be accounted for in town planning terms. Detailed reasoning is provided in our previous submission to regulation 18 draft and for brevity is not repeated here (our previous submission is in the appendix).		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/007	Neighbou rhoods	N2 Royal Victoria	N2.SA2 Lyle Park West					Blank	Blan k						Blank	Despite these improvements we reiterate some points that we do think still need amending. We believe: 1. The buffer is extended North to fully protect SIL (see black on modified map below) [see map at p.5] 2. It is explicitly stated that the height of the buffer must be higher or equal to the height of residential buildings behind it It may seem facile to write this but for a building to be an effective buffer, it actually has to provide a physical barrier. Buffers do not work if apartment blocks pop up over the top of the buffer with residents in say the top two storeys exposed to potential nuisances that those in lower storeys are not. We do note that perhaps the new reference to avoiding habitable rooms facing amenity spaces is an attempt to solve this problem. However, our preference, based on extensive experience and technical acoustic advice is that physical barriers are the gold standard for designing out nuisance and agent of change issues.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/008	Neighbourhoods	N2 Royal Victoria	N2.SA3 Connaught Riverside					Blank	Blank						Blank	N2.SA3 Connaught Riverside TLS would like to reiterate that the planning matters on this site are absolutely critical to the future of our operations in the Borough. Our Thames Refinery site neighbours it and stretches the entirety of the SA3 Connaught Riverside Eastern boundary. We strongly and wholeheartedly support the following amendments - The filling in of gaps in the buffer building - The addition of the text “No residential uses should be located within the buffer building.” - The more detailed text clarifying that “Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses. Separate HGV and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the buffer building.” - The addition of the text “The design and layout of the site should take into consideration amenity impacts of, and access to, the Thames Refinery Wharf to ensure development does not compromise its operation.” - A wavy red line marking a “Sensitive edge (noise - pollution - infrastructure).” These map and text changes should not be weakened or amended. It is important step in protecting SIL, Newham’s oldest business, one of Newham’s largest employers and critically designing out reasonably foreseeable nuisance complaints so future residents have high quality homes. As with N3.SA2 Lyle Park West, detailed reasoning is provided in our previous submission to regulation 18 draft and for brevity is not repeated here (our previous submission is in the appendix). The point on Thames Refinery Wharf is a particularly welcome addition as it was not addressed before and critical to our entire operations (every tonne of raw material passes through it) and has a big impact on the noise environment. For the same reasons as laid out above in regards to N3.SA2 Lyle Park West, we would strongly suggest explicitly stating the height of the buffer must be higher or equal to the height of residential buildings behind it.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-g	Design	N2 Royal Victoria			Table 1 Tall Buildin g Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N2 Area: Silvertown Quays (Royal Victoria) Height Limit: Up to 50m (depending on precinct) Comment: Building or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right end column. Development s above ground level may need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis: [- N2.SA1 Silvertown Quays: Any development - N2.SA2 Lyle Park West: 40m AGL - N2.SA4 Thameside West: Above 40m AGL - N2.SA5 Excel West: Above 27m AGL] - Royal Victoria: Above 50m AGL	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ11: Lyle Park, TBZ13: Canning Town and TBZ21: Excel West] which is included in the modification table.
Reg19-E-013	Transport for London		Reg19-E-013/063	Neighbou rhoods	N3 Royal Albert North														We welcome the following in the Infrastructure Requirements for site N3.SA1: ‘Development proposals will need to provide an assessment of the capacity of Beckton Park DLR Station and provide mitigation to manage any adverse impact identified to the operation of the station as a result of development of the site allocation.’ ‘Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.’		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/064	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North													We welcome the following in the Infrastructure Requirements: ‘Development proposals will need to provide an assessment of the capacity of Beckton Park DLR Station and provide mitigation to manage any adverse impact identified to the operation of the station as a result of development of the site allocation’ ‘Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.’		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/065	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North						No								We attach a plan in appendix B showing that at the west end of the site DLR tracks are within the site and Elizabeth line tunnels pass under the site (red hatched). To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the DLR and Elizabeth line structures (including the Connaught Tunnel) on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.
Reg19-E-033	Thames Water		Reg19-E-033/069	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/070	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N3.SA1 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.
Reg19-E-033	Thames Water		Reg19-E-033/071	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/072	Neighbou rhoods	N3 Royal Albert North	N2.SA3 Connaug ht Riverside					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/073	Neighbou rhoods	N3 Royal Albert North	N2.SA3 Connaug ht Riverside					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/074	Neighbou rhoods	N3 Royal Albert North	N2.SA3 Connaug ht Riverside					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-063	University of East London	DP9	Reg19-E-063/007	Neighbourhoods	N3 Royal Albert North						Blank	Blank						Blank	Neighbourhoods – N3 – Royal Albert North Neighbourhood N3 in the Draft Plan sets out the neighbourhood area vision for Royal Albert North (where the Docklands Campus is located – previously titled N4 in the Regulation 18 Plan), and states that the neighbourhood area will be ‘vibrant and cohesive neighbourhood, home to new high quality employment uses, higher-education campus and residential developments. These uses will be supported by a new neighbourhood parade at Royal Albert Quay and open space. The neighbourhood, and the University of East London in particular, will be successfully integrated into the wider network of neighbourhoods, with improved connections to neighbouring town centres and open spaces, particularly those in Beckton.” Our client has highlighted that the Docklands Campus is co-located within the same designated area as the Royal Albert Dock (RAD) development, which is embarking on a new chapter to integrate alongside the Docklands Campus and bring with it essential, sustainable growth in this area to the benefit of local people, the economy and environment within the surrounding area. UEL has already positively engaged with the new investment team for RAD, who recognise the importance of UEL as a key neighbour. The importance of a joined-up approach between both of these key stakeholders should therefore be reflected in the vision for Neighbourhood N3. The draft policy wording which supports growth in training and economic opportunities for green and low carbon industries and encourages developments to establish strong links with the University of East London to support skills, training and career development is supported, as is the policy wording around supporting improvements to the University of East London campus, including protecting and supporting enhancements to playing pitches.		Support noted.
Reg19-E-063	University of East London	DP9	Reg19-E-063/008	Neighbourhoods	N3 Royal Albert North						Blank	Blank						Blank	[Neighbourhoods – N3 – Royal Albert North] Furthermore, as work is underway regarding preparation of the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF), which encompasses a number of neighbourhood areas (including Neighbourhood N3), it is important that a consistent approach is taken in relation to the visions set out in the Draft Plan and the recently adopted OAPF.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/011	Neighbourhoods	N3 Royal Albert North						Blank	Blank						Blank	N3: Royal Victoria We welcome the reference to Thames Refinery wharf which borders this neighbourhood as well as the safeguarded wharves located opposite this neighbourhood in the Royal Borough of Greenwich, at Angerstein, Murphy's and Riverside Wharves.		Support noted.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/012	Neighbourhoods	N3 Royal Albert North						Blank	Blank						Blank	[N3: Royal Victoria] Although we have provided individual comments on the site allocations below, it is important that the supporting maps show the location of the wharves. We welcome the approach to using the 'sensitive edge' as a marker for these safeguarded and sensitive assets but would like to see clarity in labelling the wharves also.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan as currently drafted does effectively identify and safeguard the Safeguarded Wharves in line with national policy and London Plan requirements. The safeguarded wharves are included on our policies map, which provides a more detailed representation of our policy requirements and designations. They are also within identified employment areas on the key diagram, which is consistent with the level of detail provided on this diagram, which is primarily designed to illustrate our spatial ambitions, rather than land use designations. Reference is already made to the safeguarded wharves in J1, with reference made to priority employment uses for these wharves. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/013	Neighbourhoods	N3 Royal Albert North						Blank	Blank						Blank	[N3: Royal Victoria] As a general comment we also highlight the importance of referring to the Agent of Change principle within the Design Principles of the site allocations.		A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in line with the Agent of Change principles are already provided in policy D6.2. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/18	Neighbourhoods	N3 Royal Albert North	N3.SA1 Royal Albert North														We request that the Site Allocation boundary relating to N3.SA1 'Royal Albert Dock' is amended to exclude the land within the ownership of London International Exhibition Centre Plc, comprising the Phase 3 extension to the ExCeL London venue and the DoubleTree Hilton and surrounds. The Phase 3 extension to is now close to completion and will open shortly in early 2025. The DoubleTree Hilton is being retained and potentially extended to meet the significant demand for visitor accommodation. As such, neither of these sites should be included within the Site Allocation because they are not intended to come forwards for comprehensive redevelopment. Please see the plan below, identifying the extent of London International Exhibition Centre Plc's ownership in blue, overlayed on the Site Allocation. Accordingly, the Site Allocation red line boundary should be amended to reflect the blue ownership line. This approach has been agreed with GLA Land and Property. [see Map on p.9]	A change to the site allocation boundary has not been made. We did not consider this change to be necessary as the site allocation is informed by feasibility work undertaken by the Royal Docks Team. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-h	Design	N3 Royal Albert North			Table 1 Tall Buildin g Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N3 Area: Royal Albert North Height Limit: Up to 32m Comment: Any new building or structures should be subject to an OLS & ILS analysis. All developments above ground level should be subject to an independent IFP assessment. We also note that Table 1: Tall Building Zones on page 71 refers to Royal Albert North as 'N4'. This should be 'N3'. Proposed Mitigation: All new buildings or structures in this precinct need to be subject to an OLS & ILS/IFP analysis. All new buildings on Albert Island need to be subject to an assessment against the Public Safety Zone.	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/052	Neighbou rhoods	N3 Royal Albert North			Up to 32m											Any new building or structures should be subject to an OLS & ILS analysis. All developments above ground level should be subject to an independent IFP assessment. We also note that Table 1: Tall Building Zones on page 71 refers to Royal Albert North as ‘N4’. This should be ‘N3’	All new buildings or structures in this precinct need to be subject to an OLS & ILS/IFP analysis. All new buildings on Albert Island need to be subject to an assessment against the Public Safety Zone	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [19. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/04	Neighbourhoods	N3 Royal Albert North	N2.SA3 Connaught Riverside													We also support the designation of N3.SA3 Connaught Riverside as a new local centre which can support retail and leisure floorspace to accommodate the needs of residents, workers and visitors. Other suitable uses such as Large Scale Purpose Built Shared Living (LSPBSL) and amenity are also identified as appropriate uses within proposed local centres within the Regulation 19 plan, which we further support, and should be noted in the designations more evidently.		A change to this policy approach has not been made. 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.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/011	Neighbourhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	N3 SA1 Royal Albert North The RAD site is located within the N3 ‘Royal Albert North’ Neighbourhood, within the SA1 site allocation. The ‘vision’ states the following, which is strongly supported and reflects the proposals of RAD CHP Ltd. in Phase 1. “Royal Albert North will be a vibrant and cohesive neighbourhood, home to new high quality employment uses, higher-education campus and residential developments. These uses will be supported by a new neighbourhood parade at Royal Albert Quay and open space.”		Support noted.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/012	Neighbourhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[N3 SA1 Royal Albert North] As drafted, the site allocation limits educational floorspace: “Educational floorspace will only be supported where it is associated with education campuses at the University of East London and the London Design and Engineering UTC, in accordance with Local Plan Policy SI4. Development should protect and enhance existing sports and recreation facilities in accordance with Local Plan Policy SI1 and SI3”.	It should be recognised that Education uses are a key part of the masterplan vision of the RAD Phase 1 site (which has underpinned the resolution to grant of the PBSA scheme on Plot 5). The wording should therefore be adapted accordingly to acknowledge the incoming new campus at RAD within Altitude.	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 planning applications which are yet to be implemented. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/013	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[N3 SA1 Royal Albert North] With regard to infrastructure requirements, the draft states that the wider RAD site should provide a sequence of pocket parks with a combined area of 2ha. As discussed with the Royal Docks team, we consider that a masterplan-led approach should be taken, to determine the appropriate quantum and arrangement of open space, and query the source of the 2ha figure.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for a series of publicly accessible pocket parks, with a combined area of 2 hectares, has been informed by Newham’s Green and Water Infrastructure Strategy. Increasing public access to green space across the neighbourhood a key part of the N3 Royal Albert North neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GSWS2 and GWS3 which provide further detail on access to green space. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWSS. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. The quantity and type of green space stipulated in the Local Plan’s site allocations has been informed by the 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/014	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[N3 SA1 Royal Albert North] It is considered that the draft allocation should acknowledge and reflect the GLA Royal Docks team development prospectus document, including its references to timeframes to delivery and phasing. Due to the long-term nature of the implementation (10 years plus), meanwhile uses should be specifically referenced, as they are not currently referenced in the draft allocation. The allocation should explicitly reference potential uses in line with the GLA vision; namely light industrial, workspace, education, logistics, sport and leisure uses, alongside a variety of affordable and private housing.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. It is noted that this site does not have planning permission and all future planning applications will be subject to case-by-case assessment during the development management process. We consider that all phased schemes should consider what meanwhile uses could be delivered on their sites through a meanwhile strategy. Please see the wording in the implementation text of Policy BFN2.4. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/017	Neighbou rhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	Key areas for further consideration are summarised below: 1) Flexibility in land use for repurposing of the Phase 1 buildings is essential and should be acknowledged in the Royal Albert North site allocation, to help secure occupation of the largely vacant offices.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/018	Neighbourhoods	N3 Royal Albert North	N3.SA1 Royal Albert North												Blank	No
																		Blank	[Key areas for further consideration are summarised below:] 2) An overly restrictive approach to ground floor active Class E uses at Royal Albert North should be avoided and is considered unsound/unjustified. A masterplan-led approach should be taken to both retail and open space to ensure good placemaking on this strategic site. With regards to open space, a change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for a series of publicly accessible pocket parks, with a combined area of 2 hectares, has been informed by Newham’s Green and Water Infrastructure Strategy. Increasing public access to green space across the neighbourhood a key part of the N3 Royal Albert North neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GSWS2 and GWS3 which provide further detail on access to green space. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. The quantity and type of green space stipulated in the Local Plan’s site allocations has been informed by the 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. The Council is satisfied that the plan remains sound without the proposed changes. With regards to retail and Class E, the objective of the Royal Albert Quay Neighbourhood Parade designation is to address to a known gap in the network. The location and scale of this designation is supported by the methodology and assessment undertaken under the Town Centre Network Review Methodology Paper Update 2024. The parade was delivered as part of the first phase of development on the Royal Albert North site allocation, and remains significantly vacant. Therefore, the Council does not consider there is evidence to support delivery of a larger scale designation at this location. However, policy HS1 intends to provide further flexibility in meeting needs in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade, by allowing for the masterplanned delivery of small scale frontages serving localised need. The Council recognises the importance of ensuring the Plan is clear in its intended application, and has therefore made the following wording change to policy HS1.1 and its respective implementation text, which are included in the modifications table. HS1.1. [...]The network will be managed and supported to service the needs of residents, workers and visitors, and includes: [...] f. The creation of ~~new small scale frontages~~

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/020	Neighbourhoods	N3 Royal Albert North	N3.SA1 Royal Albert North					Blank	No						Blank	[Key areas for further consideration are summarised below:] 4) The currently restrictive approach to new education uses at Royal Albert North should be reviewed, and it should be acknowledged that there is currently a live masterplan being delivered by RAD CHP Ltd. to create a new educational campus on this site.		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. The infrastructure requirements for this site allocation (N3.SA1) specifies that education floorspace will be supported where it is associated with education campuses at the University of East London and the London Design and Engineering UTC, in accordance with Local Plan Policy SI4. The Local Plan is applied in the round. Policy SI4 clause 1.c sets out that new, expanded and improved education and childcare facilities can be delivered outside of site allocations delivering education space, where it can demonstrated that there is unmet demand which will not be met by any planned delivery. Clause 2 of Policy SI4 further ensures that new higher education facilities will be directed to, and supported in, Newham’s designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-244	One Newham		Reg19-E-244/030	Neighbourhoods	N3 Royal Albert North														N3 - why is so little reference made to the Enterprise Zone on Albert Island - this is meant to be a strategic development site - albeit one which has failed to move forward in the last 18 months since the decision notice was issued or 30 months since the GLA’s Royal Docks Team announced the first building would be finished by the end of 2023. Given the current status (including a lack of all the required development licences) this area remains a deserted wasteland with lost employment opportunities and a lack of resident access to open space and waterside areas. The situation is made worse by the fact the the lead developer stopped engaging with residents as soon as they had got enough ticks in boxes to satisfy the engagement requirements for the planning submission.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site did not meet the site allocation criteria set out in the Site Allocation and Housing Trajectory Methodology Note. This is because it was considered the same outcomes can be achieved through the implementation of the permission and the application of the employment and neighbourhood policies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/066	Neighbourhoods	N4 Canning Town														We note that there is no requirement for development funding towards Canning Town station improvements. This is however in the Newham Infrastructure Delivery Plan for developer contributions to provide and so	we recommend that this requirement is included in N4 for consistency.	A change to this policy approach has not been made. Canning Town Neighbourhood Vision supports “improvements to increase the capacity of Canning Town Station”. The implementation text of Policy T1.1 details that transport projects are set out in the Infrastructure Delivery Plan. The approach taken to all obligations in the Plan 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/067	Neighbourhoods	N4 Canning Town														[Developments in this area, including the Limmo site, must consider the requirements for a potential DLR extension to Thamesmead, including a potential turnback on the peninsula.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/068	Neighbourhoods	N4 Canning Town														We welcome the following in the Infrastructure Requirements for site N4.SA4: 'The site contains an active bus station. If other uses are proposed to co-locate on the bus station site there will need to be careful consideration of how the site is developed so as to not interrupt the operational capacity of the station. Existing capacity at Canning Town Bus Station must be safeguarded.'		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/069	Neighbourhoods	N4 Canning Town														[Bus infrastructure in the neighbourhood must be retained. and the agent of change principle applied to sensitive development. Canning Town bus station is within the footprint of N5.SA5. Manor Road bus stand is within the Neighbourhood boundary, north of site N5.SA4 and east of N5.SA5. Peto Street Rail Replacement bus stands are east of N5.SA4. Hermit Road bus stands are north of the N5.SA1 site.] Although no change has been made to any of the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/070	Neighbourhoods	N4 Canning Town	N4.SA4 Limmo													We welcome the following in the Infrastructure Requirements for site N4.SA4: 'The site contains an active bus station. If other uses are proposed to co-locate on the bus station site there will need to be careful consideration of how the site is developed so as to not interrupt the operational capacity of the station. Existing capacity at Canning Town Bus Station must be safeguarded.'		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/071	Neighbourhoods	N4 Canning Town	N4.SA4 Limmo													[In 'Infrastructure requirements' it is not clear where in Canning Town the proposed new bridge would connect to. The wording should be clarified to refer to the proposed walk route over the rail tracks as follows: Development should provide a new bridge connection from Canning Town the Limmo site through to Brunel Street Works, providing 24 hour non-fare paying access to the Town Centre.] We welcome the amended wording to address this point		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/072	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside													[Canning Town bus station must be retained and improved to support development in this area. We understand that the Council are progressing a public realm and active travel improvement scheme for Bidder and Stephenson Streets area. Hence mitigation measures/contributions to help deliver this will be expected. Any proposals must maintain bus access in this area alongside improvements to infrastructure and/or services where necessary. The river, A13 and the railway all cause severance and developments should contribute towards reducing these barriers, including through improving the A13 underpass, the routes either side of the A13 and the crossing beneath the viaduct at the roundabout. Until and unless an alternative alignment for the proposals for the Mayer Parry walk and cycle bridge over the Lea are agreed, the site should safeguard a landing point and provide for a continuous riverside walk and cycleway.] We welcome amended wording in the design principles and infrastructure requirements for site N4.SA5 to address these points. We welcome inclusion of the requirement to safeguard land for a new bridge connection and the accompanying map showing the location for the bridge landing point. It would be beneficial to also include a key route through the centre of the site from Bidder Street to the River Lea as shown in the Crown Wharf planning application to form a connection to the bridge, and a key route through the Local Mixed Use Area. This is to ensure there are sufficient links through the site from the river walk for safety and connectivity reasons.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Site Allocation map has been positively prepared to illustrate the design principles for the site, this will ensure that there are sufficient links through the site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/073	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside						No								The southern boundary of this site includes land occupied by DLR tracks and the south-eastern corner appears to include airspace above both Jubilee line and DLR tracks. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the LU and DLR tracks and operations on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/075	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/076	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N4.SA1 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/077	Neighbou rhoods	N4 Canning Town	N4.SA2 Silvertow n Way East					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/078	Neighbou rhoods	N4 Canning Town	N4.SA2 Silvertow n Way East					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/079	Neighbou rhoods	N4 Canning Town	N4.SA2 Silvertow n Way East					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/080	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/081	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N4.SA3 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/082	Neighbou rhoods	N4 Canning Town	N4.SA4 Limmo					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/083	Neighbou rhoods	N4 Canning Town	N4.SA4 Limmo					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N4.SA4 Phasing and Implementation Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades which will need to reflect the cumulative impact of significant quantities of development in this location. This requires early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/084	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/085	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/002	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													These representations relate to the Site which forms part of the proposed site allocation ‘N4.SA1 Canning Town East’ within the draft Local Plan. A Site Location Plan is provided at Appendix 1 . These representations also relate to the relevant wider policies of the draft Local Plan		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/003	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													The Site has significant redevelopment potential and we support the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing, the provision of high quality community facilities as well as open space. We have set out our detailed comments in this letter.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/005	Neighbourhoods	N4 Canning Town	N4.SA1 Canning Town East													The Site is approximately 0.17 hectares (ha) and currently accommodates a part three-storey commercial building currently in use as a public house, the Beckton Arms. Whilst the Beckton Arms is currently still in use, the building is both in need of repair and does not see frequent footfall therefore no longer a viable operation. The Site is located on the south side of Beckton Road and is bounded by the A13 Newham Way to the south. It is accessed via Beckton Road which operates as a slip road to the A13. To the west of the Site is a subway connecting with the south side of the A13 and to the east is green space with footways to Beckton Road. The Site has a Public Transport Accessibility Level (PTAL) score of 5 (with 1 being the lowest and 6 the highest) reflecting a very good public transport links and accessibility. The Site is served by Canning Town underground station and several near-by bus services. The Site is located within Flood Zone 3, benefiting from flood defence including culverts, embankments and flood walls.		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/006	Neighbourhoods	N4 Canning Town	N4.SA1 Canning Town East													The Site is subject to the following key adopted (current) planning policy designations: • The Site is within the Royal Docks and Beckton Riverside Opportunity Area and located within S15 (Canning Town East) Strategic Site Allocation which supports the delivery of residential with supporting community uses. • The Site is also located within the Archaeological Priority Area APA 3.4 Canning Town/Newham Way.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/007	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													In April 2024, Beckton Development submitted a request for pre-application advice and a meeting for a residential-led, mixed use redevelopment of the Site. The Pre-Application proposed the redevelopment of the Site to provide a building ranging from 12 to 25 storey's in height which would resultantly provide residential units in the upper floors and dedicated community space at ground floor level. A breakdown of the proposals is provided below: • The delivery of 158 new residential dwellings including the delivery of 50% affordable housing (subject to grant funding); • The scheme will provide high quality residential accommodation which will provide useable and functional spaces, together with high quality communal open space; • The delivery of c.262 sqm of community space which would align with the Strategic Site Allocation requirements; and • Additional hard and soft landscaping will also be provided with improvements to the public realm and existing subway. To date, the application has undergone two pre-application meetings and received formal written pre application advice from LBN dated 30 July 2024. The Applicant team is currently in the process of reviewing the feedback received.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. It is noted that this site does not have planning permission and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/009	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													We note that the key principles of the adopted Site Allocation are being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the Site is subject to the following key draft planning policy designations: • Site Allocation N4.SA1: Canning Town East; • Neighbourhood Boundary: Canning Town; • Tall Building Zone 13 Canning Town: - o Prevailing height: Above 21m but below 32m (7-10 storeys); - o Maximum height: 50m; and • Archaeological Priority Area APA 3.4 Canning Town/Newham Way.		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/011	Neighbou rhoods	N4 Canning Town														We note that paragraph 8 of draft Policy N4 (Canning Town) which relates to the wider Canning Town neighbourhood boundary states the vision for Canning Town will be achieved by “retaining existing mature trees”. Whilst our client advocates for the retention of trees where possible, it should be considered that in order to make efficient use of land, this may not always be possible.	As such, we request the following change to be made to paragraph 8 of Site Allocation N4: Policy N4 Canning Town "Retaining existing mature trees where possible and maximising the provision of new open space, green infrastructure and green links and the opportunities to increase biodiversity..." Making this change would provide flexibility for sites based upon their individual surroundings and will ensure that the draft local plan is effective in its delivery.	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 remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/012	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													Fundamentally, our Client fully supports the principle redevelopment of Canning Town East for a residential led development with associated community facilities and open space for draft site allocation N4.SA1. However, the development principles set out for Canning Town East state that the Site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. In order for all available sites to come forward for housing, a comprehensive approach to development might not be suitable for all sites within the site allocation.	To ensure flexibility, we consider the following text should be added to the development principles: Site Allocation N4.SA1: Canning Town East Design principles Where appropriate, the site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Making this change would provide flexibility and it will ensure that the draft Local Plan and site allocation can be effective in its delivery	This wording change is not supported. We did not consider this change to be necessary as the masterplanning requirement is positively prepared, justified and effective. The policy requirement for masterplanning (set out in Policy BFN2) 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. 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. This will then be secured through the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/013	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													Under the sub-heading Design Principles the policy notes that building heights should range between 9 – 21m (c3-7 storeys) in the eastern part of the site and between 21 – 32m (c7 – 10 storeys) in the western part of the site, with opportunities for taller buildings up to 40m (c13 storeys) to mark the east entrance to the site and up to 50m (c16 storeys) in the proximity of the A13, to the western entrance to the site and to mark open spaces. It is considered that the Policy is overly restrictive, contradicting a number of other strategic objectives of the Plan, such as the direction of growth to sustainable locations across the Borough.		We disagree with your view that the site allocation’s design principles are overly restrictive. The Council considers the policy to be in conformity with the 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. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, the Council disagrees with your view that the policy contradicts the Plan's objective as the site’s capacity for growth has already been considered in the assessment for suitable locations for tall buildings. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/014	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													It is important to emphasise that this restrictive policy position in regard to tall buildings conflicts with policy at the regional level. Policy D9 of the London Plan 2021 does not prevent tall buildings from coming forward outside of ‘appropriate locations’ chosen by the Council, but rather, it allows for Local Plans to cite what may be an ‘appropriate’ height while providing the flexibility for judgement through the Development Management process and a design-led approach in regard to what an acceptable height may be. Part A of Policy D3 of the London Plan states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations”. Part B states that “Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”.		The Council considers the policy to be in conformity with the 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 location. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of policy D3, 3.3.1 clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.” In line with policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. 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 considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/015	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													. We consider the proposed approach to tall buildings within Site Allocation N4.SA1: Canning Town East to be inflexible and an inappropriate strategy for the Borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites is a strategy that is reiterated in both Policy D3 (Optimising site capacity through the design led approach) of the London Plan and paragraph 130 (e) of the National Planning Policy Framework.		The Council considers the policy to be in conformity with regional and national policy requirements. In line with paragraph 130.e of the NPPF 2023, London Plan policy D3 requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of policy D3, 3.3.1 clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.” In line with the NPPF 2023 and London Plan policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Therefore, the spatial strategy for the Tall Building Zones and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations. 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 considers that this policy approach is sound.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/016	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													Part B (2) of Policy D9 of the London Plan states that ‘Any such locations and appropriate tall building heights should be identified on maps in Development Plans’ therefore, Local Plans have the ability to cite what height may be ‘appropriate’ in certain locations. The recommended height provisions should remain flexible, as a judgement should be made through the Development Management process and through a design-led approachin regards to what an acceptable height may be, in regards to the impact tests set out in Part C of the policy.		The Council considers the policy to be in conformity with the 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. In line with London Plan policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. 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). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/017	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East													Ultimately, we maintain the view that it is for the Development Management process to determine the most appropriate form of design for individual sites. The Development Plan should aid the optimisation of suitable brownfield sites in Newham as opposed to setting a prescribed physical form of development. For the reasons set out above, we consider this policy as drafted is not justified. The application of draft Policy N4.SA1 is likely to discourage development and unduly restrict LBN’s ability to deliver the wider objectives of the DNLP. The policy as drafted is also therefore not effective. It is recommended that the Policy is amended to allow development proposals to use a design led approach to make the best use of land and optimise the capacity of a site.	Building heights should range between 9-21m (c3-7 storeys) in the eastern part of the site and between 21-32m (c7-10 storeys) in the western part of the site, with opportunities for taller buildings up to 40m (c13 storeys) to mark the east entrance to the site and up to 50m (c16 storeys) in the proximity of the A13, to the western entrance to the site and to mark open spaces. Massing should step down to sensitively integrate with the low rise context to the east. However, at the forefront, development proposals should use a design led approach to make the best use of land and optimise the capacity. Development proposals should have regard to the indicative capacity but should not be restricted by the specific parameters set.	The Council considers the policy to be justified, effective and in conformity with the London Plan. London Plan policy D9 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 location. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. London Plan policy D3 requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of policy D3, 3.3.1 clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.” In line with London Plan policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Therefore, the site allocation design principles result from an evaluation that already addressed design-led approach considerations. 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 is sound without the proposed changes.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/037	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East						No							In summary, our Client supports the principle of the site allocation N4.SA1: Canning Town East for the redevelopment of the site which would provide significant public benefits including community space and new housing. With the suggested amendments we consider that the draft Local Plan would be sound.		Comment noted. Responses to the individual representations made are provided above.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/038a	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East						No							However, as drafted, some of the policies noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national and regional policy, notably the restriction of tall building heights [and affordable housing requirements]. Therefore, it is considered that in its current format, the draft Local Plan is considered not sound.		The Council considers the policy to be effective and in conformity with regional and national policy requirements. London Plan policy D9 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, the site allocation design principles result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. The Council considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/038b	Neighbou rhoods	N4 Canning Town	N4.SA1 Canning Town East						No							However, as drafted, some of the policies noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national and regional policy, notably the [restriction of tall building heights] and affordable housing requirements. Therefore, it is considered that in its current format, the draft Local Plan is considered not sound.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed affordable housing target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability challenges in meeting this target, the testing was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/003	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													This Site falls within the western portion of the emerging site allocation N5.SA3 ‘Canning Town Holiday Inn’. We provide detailed commentary on the key relevant policies, with proposed amendments to the policy wording provided in the table on pages 9-10.		Comment noted. The Local Plan is supported by a range of evidence base documents, including the Strategic Housing Market Assessment, Employment Land Review and the Sustainable Transport Strategy. The approach is considered sound and legally compliant and this site should be considered as part of the new SHLAA.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/004	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The Site is located along the A1011 at Canning Town, Newham and comprises a 5-storey Holiday Inn Express Hotel with a car park to the rear and additional disabled parking to the front. The Site benefits from excellent public transport accessibility, with the majority of the Site having a Public Transport Accessibility Level (“PTAL”) of 6a and a portion to the south having a PTAL of 4. The PTAL is forecast to improve to a PTAL of part 6a, part 5 by 2031. George Street bus stop is located on the A1011 directly outside the site, and Canning Town underground station approx. 300m north. The Site is approx. 170m to the west of an area of public open space ‘Keir Hardie Recreation Ground.’ The Site is not within a conservation area and does not include any statutorily or locally listed buildings. The Site is situated within Flood Zone 3 but benefits from local flood defences		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/005	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The Site is immediately adjacent to business and industrial premises to the east; a car wash to the south and new-build high-rise residential blocks to the north and west, which each contain commercial uses at the ground floor, including retail and restaurants. The immediate area is undergoing significant redevelopment and identified in the Draft Local Plan within the designated Canning Town District Centre.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/006	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The current use of the Site has been somewhat 'left behind' by the pace and character of new development in the immediate surrounding area. The hotel is on a different scale to other buildings on Silvertown Way. The design and single use of the building has become rather drab and uninspiring now it is surrounded by multi storey, mixed use and high quality new buildings.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/007	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													It has therefore been identified by our client as appropriate for development in the form of the retention, extension and re-cladding of the existing hotel. The existing hotel is often functioning at maximum capacity and our client wishes to deliver additional visitor accommodation to support the local economy. They are also seeking to improve the external appearance of the hotel and enhance the public realm through extensive landscaping to better respond to the prevailing local context and deliver high-quality design. We are currently discussing the emerging proposals with Officers through pre-application engagement and ongoing discussions with the Design Review Panel.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/008	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													Background and Context In April 2022, as part of the Local Plan Review, we completed and submitted the Council's Land Availability Questionnaire in relation to the Site. This confirmed that the Site is available and could provide an opportunity for redevelopment, to include the delivery of much-needed new homes within 5-10 years; thereby well within the new Plan period up to 2038.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/009	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													In June 2022, following confirmation from the Council that the Site had been identified as potentially available, suitable and deliverable as part of the Local Plan review, we provided Policy Officers with some initial design feasibility work to support the capacity testing exercise. This set out our client’s early vision for the Site. In January 2023, this early vision had been further developed and we submitted proposals for the comprehensive redevelopment of the Site to Officers, which comprised a mix of commercial uses (Class E) and residential uses (Class C3) in buildings of up to 28-storeys. The Council’s pre-application feedback challenged building heights and density, such that our client determined that the mixed-use scheme (to include housing) would not be viable in the immediate term. Instead, our client has focused on exploring the retention, extension and re-cladding of the existing hotel asset. Since then, we have been discussing the emerging proposals with Officers through pre-application engagement, a Design Review Panel and Members Briefing		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/010	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The publication and approval of the Draft Local Plan by Cabinet in December 2022 confirmed the draft allocation of the Site for redevelopment as part of ref. N5.SA3 ‘Canning Town Holiday Inn’, and we submitted representations in broad support of this allocation in February 2023. Whilst our client’s aspirations for the site have progressed since our first round of our comments, we continue to support the broad principles set out in the draft site allocation and our detailed comments can be found below.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/011	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													It is important to note that whilst our client’s aspirations for the site in the immediate term comprise the implementation of a hotel extension scheme (subject to securing planning permission), there remains the potential for an alternative approach (to potentially include housing) to be taken on the site should wider market, economic and lifestyle changes dictate such. This is not expected to be within the new Local Plan period, noting this is likely to be less than 15 years and therefore there will be a further review within five years of adoption. We note the draft allocation for the site indicates delivery of development during the medium-term (e.g. year seven) by which point we would expect a review of the Local Plan to be underway and any change in the site-specific circumstances would be promoted on behalf of our client accordingly.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/012	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													a) Development Principles (Land Uses) The draft site allocation N5.SA3 'Canning Town Holiday Inn' covers the area of land between Silvertown Way, Shirley Street and Brunel Street, as shown in Figure 1 below. As shown in the enclosed Site Location Plan, our client has an interest in the land to the west of the allocation, which is currently used as a Holiday Inn Express hotel. The draft site allocation identifies the broader site for: "residential development, employment uses, open space and main town centre uses and social infrastructure, including community facilities". It sets out that "the type and quantity of main town centre uses should be consistent with a district centre designation and Local Plan Policy HS1"		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/013	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													Our client is in broad support of the draft site allocation, which covers their aspirations for redevelopment in the immediate term (hotel extension) and longer term (mixed-use regeneration, to potentially include housing). The proposed residential, employment and main town centre uses are considered appropriate in principle and supported across the broader site.		Support noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/014	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													In particular, the provision of main town centre uses in this location is supported, to include hotels (as defined in the NPPF 2023), given the site's designation within Canning Town district centre and the existing hotel use on the site. We are of the opinion that there is scope to intensify the existing hotel use on the site, as the existing business is often functioning at maximum capacity, attracting demand from visitors to London City Airport, London Excel, the O2 arena etc, and will deliver an increased number of employment opportunities. Evidence of the demand for the hotel extension will be submitted to support any forthcoming planning application.		Support noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/015	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													Alongside the main town centre uses, the draft site allocation seeks to secure "employment uses". It states that "the employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace and provide a range of employment spaces to support the growth of new economic sectors, within E(g) and B use classes". Local Plan Policy J1 sets out that "developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough's office and industrial needs" and that new employment floorspace should be directed to Strategic Industrial Locations ('SILs'), Local Industrial Locations ('LILs'); retail and leisure parks with good accessibility to the Strategic Road Network; and Local Mixed Use Areas ('LMUA').		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/016	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The map of Newham’s Employment Designations confirms that the site is not designated within a SIL, LIL or LMUA and on this basis we would advocate for the removal of any reference to typical B class industrial uses within this site allocation. We are of the opinion that the site is unsuitable for B class industrial uses given the proposed co-location of residential uses on the broader site allocation. Residential uses would be sensitive to the noise and emissions associated with industrial uses on the site, and therefore there would likely be a detrimental impact on neighbouring amenity. We therefore support the aspirations for industrial uses to be located in SILs, LILs and LMUA, in accordance with draft policy J1, rather than on draft site allocation N5.SA3.		A change to this policy approach has not been made. 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.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/017	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													We note the importance of securing mixed-use development to support the vitality and viability of Canning Town district centre, and we would advocate for the definition of ‘employment uses’ being expanded to incorporate main town centre uses. Town centre uses, including hotels, offer a broad range of employment opportunities for local people, including for example managerial positions, reception staff, back of house staff etc, which could also be expanded through the delivery of other main town centre uses on the broader site. These could include retail development; leisure and entertainment; offices, and arts and culture, as defined in the NPPF 2023, which would better complement the provision of any residential accommodation on the site.	We therefore think that employment floorspace could be better secured through the provision of main town centre uses on the site, which also includes scope for offices, than typical B-class industrial land	A change to this policy approach has not been made. We did not consider this change to be necessary as main town centre uses is included as one of the priority land uses at this site allocation while the requirement for employment floorspace would reprovide the existing capacity at the site. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/018	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The draft site allocation also suggests that the site should provide “social infrastructure, including community facilities”. It references that “development should address the need for community facilities in the area by delivering new community facilities in Canning District Centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider all types of community facility, as set out in the Community Facilities Needs Assessment 2022) evidence base. Any provision should meet the requirements of Local Plan Policies SI2 and SI3”. The Community Facilities Needs Assessment (2022) indicates that there is a good provision of community facilities (community centres, public houses, gallery and places of worship) in relative proximity of the site (see Figure 2 below) and that there has been a gain in community facilities within Canning Town and Custom House through recent consents. It also confirms that the general distribution of community facilities is to the west of the borough, where the Site is located, and that Canning Town and Custom House have the second highest number and density of community facilities with 1.4 facilities per 1000 people.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/019	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The evidence therefore indicates that there may not be a need for community facilities on the site allocation in the immediate future. Development proposals also cannot be expected to address existing deficiencies in the local area but should address any demand that arises from their proposals, in accordance with CIL Regulation 122. It is unlikely that the proposals for the retention, extension and re-cladding of the existing hotel will generate demand for community facilities, as visitors will only be staying at the hotel for a transitory period and will not introduce a new permanent population within Canning Town. It is more likely that any residential accommodation that comes forward on the site could generate demand, which could be addressed through the development management process in accordance with CIL Regulation 122.		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) has identified a need for community facilities in the area. As set out in Policy SI2, the Local Plan is not supportive of speculative community facilities. It is for this reason the development principles for the site allocation states ‘...Development should address the need for community facilities in the area by delivering new community facilities in Canning District Centre, unless it can be demonstrated that the needs of the community have already been met...’. The Local Plan is applied in the round. The development principles section of the site allocation duly directs the reader to Local Plan Policy SI2 for the delivery of this element. Policy SI2 clause 1.a sets out that a sufficient supply of community facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/020	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The emerging proposals for the retention and extension of the hotel also seek to deliver a variety of facilities that will be open to the public and local community. This will include a new hotel bar and restaurant, conferencing facilities for local workers and a co-working space. These facilities will also be supplemented through the positive qualitative enhancement of the public realm along Silvertown Way to provide well-considered access points; integration with forthcoming plans for Silvertown Way; extensive green infrastructure; alongside the delivery of other benefits for the local neighbourhood, in accordance with draft Policy D2 (Public Realm Net Gain).		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/024	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													As we have discussed with Officers, our client is simply seeking to retain and extend the existing hotel business in the immediate term. We are of the opinion that this does not warrant the same level of coordination as a comprehensive mixed-use redevelopment would (as was originally proposed). Our proposal is being carefully designed to ensure it does not prejudice the delivery of any future development to the north, should that come forward, with regard for the Council's wider aspirations for the draft site allocation.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is positively prepared and justified, aiming to deliver the priority land use needs as identified in various evidences. Policy BFN2 requires applicants to deliver development principles in the site allocations using the masterplanning approach. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/030	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The draft site allocation sets out that “Development should address open space deficiencies by providing a pocket park. Community growing opportunities should be provided as part of the site’s communal amenity space. In addition to the open space provision, development should provide publicly accessible play space, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm or provided as part of the pocket park”. The Newham Green and Water Infrastructure Strategy (2024) sets out there is generally a deficiency in publicly accessible green spaces across the Borough. It raises that Canning Town South, where our site is located is currently deficient relative to the Borough average, and population growth will only make the existing deficit more pronounced (see Paras 5.16 & 5.19). The document also notes that the current and projected rates of allotment provision is below the standards recommended by the National Allotment Society and there are challenges in the current supply of play-space.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/031	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													These deficiencies are noted, however development proposals cannot be expected to address existing deficiencies in the local area but should address any demand that arises from their proposals, in accordance with CIL Regulation 122. We would expect the requirements for the provision of open space, community allotments and playspace to be on a demand-basis, which is more likely to arise from the provision of conventional residential accommodation. It is unlikely that the proposals to retain and extend the existing hotel will generate this demand, and we would therefore request that this is clarified within the site allocation wording.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for publicly accessible green space on this site has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. 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. Site allocation N4.SA3 Canning Town Holiday Inn is required to deliver a pocket park and publicly accessible play space. This green and play space will be of benefit to both residents living in the site allocation and the wider neighbourhood in which the allocation sits. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/032	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The emerging proposals for the retention and extension of the existing hotel also seek to include extensive green infrastructure along Silvertown Way, which will deliver benefits to the public realm in accordance with draft Policy D2 (Public Realm Net Gain). Whilst this doesn’t directly provide a public open park, the size of the site and development principles for a variety of uses to be provided on site limit the potential for a conventional ‘park’ to be provided on site. We would therefore welcome scope for the provision of green infrastructure rather than a pocket park to be provided on site.		A change to this policy approach has not been made. We did not consider a change to be necessary as the need for additional publicly accessible green space is justified in 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. 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. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N4.SA3 Canning Town Holiday Inn, to deliver green space in the form a consolidated pocket park. This will be of benefit to residents on the site allocation and the wider neighbourhood. In addition, the site should provide publicly accessible play space, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm or provided as part of the pocket park. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/036	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The allocation of the Site within the Draft Local Plan for redevelopment is welcomed and supported. It is noted that our client only has control over a portion of the draft site allocation, within which we feel there is an opportunity to deliver additional visitor accommodation through the retention, extension and re-cladding of the existing hotel. This will help to: secure employment opportunities for the local area; deliver extensive green infrastructure and an enhanced public realm along Silvertown Way; ensure an efficient use of the site; and contribute to the delivery of high quality design within the first 5-10 years of the new Local Plan period.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/037	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn						No							Our comments above incorporate proposed amendments to the wording of the draft site allocation and other relevant policies to ensure that the emerging local plan remains effective and deliverable in accordance with tests of soundness set out in NPPF 35. We would be grateful for confirmation that this letter of representation has been received, and that it will be taken into account. We will look forward to continuing to engage with the remaining stages of the preparation of the emerging Newham Local Plan and would like to reserve the right, on behalf of our client, to comment on any future consultation stages. Should you have any questions regarding its contents please do not hesitate to contact me at this office.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/041	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn														Development should ~~address~~ provide green infrastructure (to include public realm and landscaping improvements) ~~open space deficiencies by providing a pocket park.~~ Community growing opportunities should be provided as part of the site’s communal amenity space, where there is an identified demand associated with residential accommodation. In addition to the ~~open space~~ green infrastructure provision, demand-generating development (e.g. residential) should provide publicly accessible play space to meet the needs of the development, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm ~~or provided as part of the pocket park.~~	A change to this policy approach has not been made. We did not consider a change to be necessary as the need for additional publicly accessible green space is justified in 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. 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. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N4.SA3 Canning Town Holiday Inn, to deliver green space in the form a consolidated pocket park. This will be of benefit to residents on the site allocation and the wider neighbourhood. In addition, the site should provide publicly accessible play space, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm or provided as part of the pocket park. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/042	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn														The various site parcels under different land ownership should be designed in a coordinated manner and ~~developed comprehensively~~ ensure they do not prejudice the delivery of other parcels in the site allocation , in accordance with Local Plan Policy BFN2. Indicatively , building heights should range between 21-32m ~~(ca. 7-10 storeys)~~ with taller buildings up to 50m ~~(ca. 16 storeys)~~ along Silvertown Way. Massing should step down towards the northern-eastern part of the site to sensitively integrate with the low rise context.	This wording change is not supported. 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. In relation to height parameters, we did not consider this change to be necessary as the Council considers the policy to be in conformity with the 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purposes only, policy D4 applies to all buildings of 21m, irrespective of use and related floor to floor heights. Tall building developments that fall within Tall Building Zones should be developed up to the maximum height parameters expressed in meters within policy D4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/043	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn														Residential development, employment- generating uses, ~~open space green infrastructure (to include public realm and landscaping improvements)~~ and main town centre uses and social infrastructure (subject to an identified demand) . ~~including community facilities~~ . The type and quantity of main town centre uses should be consistent with a district centre designation and Local Plan Policy HS1. Demand-generating development (such as residential) should address the need for community facilities in the area by delivering new community facilities in Canning District Centre where this is identified and directly related to a development proposal , unless it can be demonstrated that there is sufficient community facilities to meet the identified need from a development proposal ~~the needs of the community have already been met~~ . Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for publicly accessible green space on this site has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. 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. Site allocation N4.SA3 Canning Town Holiday Inn is required to deliver a pocket park and publicly accessible play space. This green and play space will be of benefit to both residents living in the site allocation and the wider neighbourhood in which the allocation sits. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/043a	Neighbourhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn														The employment- ~~generating~~ uses should be consistent with Local Plan Policy J1 ~~and prioritise industrial floorspace~~ and provide a range of employment ~~spaces~~ opportunities through main town centre uses to support the site's location in Canning Town District Centre , and the growth of new economic sectors, within E(g) ~~use class and B use classes~~ .	This wording change has not been made. We did not consider this change to be necessary as main town centre uses is included as one of the priority land uses at this site allocation while the requirement for employment floorspace would reprovide the 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. Furthermore, the term 'employment-generating uses' is not consistent with how employment uses are referred to across the Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/029	Neighbourhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 9) [see Appended – Regulation 18 Draft Local Plan SEGRO response] .		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed and is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/004	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													The Proposed Development and Principle of Site Allocation We fully support that the draft Regulation 19 Local Plan seeks to allocate the Site for residential led re-development under site allocation ref. N5.SA3 ‘Canning Town Holiday Inn’ [considered under be N4.SA3 Canning Town Holiday Inn]. As set out in the latest pre-application document produced by Metropolitan Workshop (Appendix 1) [No appendix was submitted], Canning Town is undergoing significant re-development which is transforming its skyline. There are a number of new developments coming forward immediately surrounding the site and the area is transitioning into new residential-led mixed use neighbourhood. The proposed vision for the Site would deliver a number of clear benefits that align directly with the objectives of the new Local Plan, including the following: • Optimising a vacant and underutilised brownfield Site to deliver residential (Use Class C3) accommodation as well as associated affordable housing provision; • The delivery exemplary designed buildings that are respectful of the existing context but also respond positively to the evolving townscape in the Canning Town Area; • Improving the ground floor environment along Shirley and Brunel Street by delivering a more traditional street scene with active residential frontages and improved hard and soft landscaping for use by pedestrians; and • Improved connections and permeability to neighbouring development Sites and beyond. Please refer to the pre-application document in Appendix 1 for and illustrative summary of the latest Proposed Development.[No appendix was submitted]	Comment noted.	

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

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/006	Neighbou rhoods	N4 Canning Town	N4.SA3 Canning Town Holiday Inn													
<i>Design Principles and Building Heights</i> The site allocation sets out the following design principles that Proposed Development within it should follow: “The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys) along Silvertown Way. Massing should step down towards the northern-eastern part of the site to sensitively integrate with the low rise context. The site should provide main town centre uses as an active frontage along Silvertown Way, with quality public realm. The industrial and employment floorspace should be designed to be neighbourly to surrounding uses, including residential The site should be designed to avoid conflicts between any HGV vehicle movements servicing the employment floorspace and pedestrians. Development should reinforce the legibility of the existing street hierarchy through appropriate scale and massing on primary and secondary streets, consolidating the frontage along Silvertown Way. Routes through and to and from the site should improve access and connectivity along Silvertown Way and Shirley Street, and to St Lukes church, Keir Hardie Recreation Ground and future proposed open space at the Limmo Peninsula. Design of the site needs to consider access and servicing of the site, noting the context of Silvertown Way, which can be subject to high congestion levels. Development should conserve or enhance the listed buildings in the proximity of the site and their settings Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6, particularly on Silvertown Way. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy. The layout of the site should take account of the noise contours across the site from London City Airport and design measures should minimise exposure from the airport” Since the previous Regulation 18 version of the Local plan, we note that the following key changes have been made to the design principles: • An increase to the appropriate of building heights on the Site. The previous version of the Local plan suggested 6-8 storeys, whilst the current wording suggests 7-10 storeys. The proposed policy wording now also provides the total appropriate height in meters whereas this was not included before. Policy D3 of the London Plan states that Proposed Development must make the																			
We would therefore suggest the following amendments to the site allocation in relation to building heights: “The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should be determined ~~through townscape analysis range between 21-32m (ca. 7-10 storeys)~~ with taller buildings to a maximum height of up to 50m (ca. 16 storeys) along Silvertown Way. Massing should step down towards the northern-eastern part of the site to sensitively integrate with the low rise context.																			
This wording change is not supported. We did not consider this change to be necessary as the Council consider the policy to be in conformity with the 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. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to townscape analysis. Furthermore, as highlighted in the Tall Building Annex (2024) ‘prevailing heights will help establish a consistent character in line with the existing and emerging surrounding context, from which taller building elements could emerge’. The Council is satisfied that the plan remains sound without the proposed changes.																			

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. As a part of the on-going pre-application discussions for the Site, project architects Metropolitan Workshop have undertaken a robust analysis of the Site having regard to the requirements of Policy D3, taking into account Site specific opportunities and constraints which in turn has informed the design development. Aforementioned, the Site is not located in a Conservation Area, not it particularly sensitive from a townscape and heritage perspective. Whilst we support the increase to the total building heights, we do not think that they should be prescriptively listed within the policy wording, rather, building heights on the Site should be determined based on townscape analysis and the need optimise the Site for residential accommodation. The contribution individual buildings can make to the area through high quality architecture as well as other benefits is also a key consideration. As illustrated in the pre-application material presented to date, there is the potential to strike the right balance and optimise the Site by delivering three residential blocks: - Block A: Part 14, 9 and 11 storey building carefully stepping down from the 16 storey development planned at the Holiday Inn Site: - Block B: A 10 storey building fronting onto Shirley Street - Block C: A series of 4 storey maisonettes grounding the Proposed Development.		
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/15	Neighbou rhoods	N4 Canning Town		4.17 Profile section				Yes	Yes							N4 Canning Town The Authority supports the additional wording added to the Canning Town Profile paragraph 4.17 which adds a reference to the Regional Park and states: "The Greenway runs to the north of the neighbourhood and, in the south west, part of the neighbourhood is in the Lee Valley Regional Park.		Support noted.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/016	Neighbou rhoods	N4 Canning Town	N4.SA4 Limmo					Blank	Blan k						Blank	N4: Canning Town N2.SA4 Limmo has stated the requirement for a new river wall as part of the necessary infrastructure. There will likely be a requirement for a river works licence with the PLA to carry out such works, and the PLA should be consulted at the appropriate time.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-i	Design	N4 Canning Town			Table 1 Tall Buildin g Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N4 Area: Canning Town Height Limit: Up to 100m Comment: All development above 70m should be subject to an OLS/ILS analysis and might need to be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguards requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ13: Canning Town] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/053	Neighbourhoods	N4 Canning Town			Up to 100m											All development above 70m should be subject to an OLS / ILS analysis and may need to be subject to an independent IFP assessment.	Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [13. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.
Reg19-E-218	IXDS	RPS	Reg19-E-218/052	Neighbourhoods	N4 Canning Town		Vision				Yes	No						Yes	As per representations made by IXDS Ltd on other policies, to ensure consistency with the emerging requirements of the draft NPPF (2024) and in recognition of the ‘Critical National Infrastructure’ (CNI) classification that now applies to data centres in the UK (as per the press release [see hyperlink in representation document] from the Department for Science, Innovation and Technology on the 12th September 2024), land for data centres should be identified or safeguarded through spatial designations within the Local Plan. As such, the vision for the Canning Town neighbourhood (at pages 406-407 of the Local Plan) should include the safeguarding of the Mayer Parry Wharf site for data centre use given the live planning application on this site (reference 24/00088/FUL). Further to this, the policy text for N4 should explicitly refer to the Mayer Parry Wharf site being safeguarded for digital and data economy uses.	Key to modifications: Deletions in ~~striketrough text~~ Additions in <u>underline text</u> “N4: Canning Town Vision The Canning Town neighbourhood will benefit from a high level of growth, which will be delivered through the transformation of sites in and around the Canning Town District Centre, whilst the north of the neighbourhood will benefit from the enhancement of its existing character. Canning Town District Centre will be a thriving and vibrant centre, with a successful street market and a growing evening and night time local offer, and will be enhanced through new housing, retail, data and digital economy, leisure and community uses, and improved public realm. The neighbourhood will benefit from improved connections to the Royal Docks, with improvements to Silvertown Way and improvements to Canning Town Station. Walking and cycling routes across the neighbourhood will be improved to better connect Canning Town and Custom House. The neighbourhood will also benefit from a new park at N4.SA4 Limmo and improved access to the River Lea.	This wording change is not supported. We did not consider this change to be necessary as it is too detailed to be included in the neighbourhood vision. Data centres are considered an employment use and the inclusion of new employment uses within the neighbourhood is already well recognised in the vision. Moreover, it is clear that our local plan should proceed based on the December 2023 NPPF following the transitional arrangement. 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 remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-218	IXDS	RPS	Reg19-E-218/053	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside		6			Yes	No						Yes	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 within the policy should specify that both solely employment and employment-led mixed use developments are to be supported.	[Key to modifications: Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N4: Canning Town” The vision for Canning Town will be achieved by: ... 6. supporting appropriate development at the Bidder Street Local Mixed Use Area (LMUA) to support lighter industrial workspaces as part of employment, or employment-led mixed use development on the LMUA and enabling a smooth and neighbourly transition to the Strategic Industrial Location in the north, as well as requiring digital connectivity and digital innovation and technology as part of modern industrial development including at the Mayer Parry Wharf site as part of Site Allocation N4.SA5 : Canning Town Riverside and encouraging further such development within the locality; ...”	The need for clarification of the terminology 'employment-led' development is noted. This has been rectified by adding the following wording to Local Plan Policy J1 and the Glossary: 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. Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met. Glossary: 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. Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met. which is included in the modification table.
Reg19-E-218	IXDS	RPS	Reg19-E-218/054	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	As per representations made by IXDS Ltd on other policies, to ensure consistency with the draft NPPF (2024) (paragraphs 84 and 85), land for data centres should be identified (or safeguarded) through spatial designations within the Local Plan. As part of this, the Mayer Parry Wharf site (comprising the northern part of the N4.SA5 draft Canning Town Riverside Site Allocation which is the subject of planning application reference 24/00088/FUL for a data centre development) should be explicitly safeguarded in the Local Plan for digital and data economy uses and needs to benefit from appropriate policy requirements to guide this form of development which is seen as a catalyst and gateway development.		This proposed change is not supported. We did not consider this change to be necessary as it is clear that our local plan should proceed based on the December 2023 NPPF following the transitional arrangement. Our policy is in conformity with the NPPF as the delivery of data and digital growth is already addressed in Local Plan Policy W4, the Inclusive Economy chapter 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 chapter, as well as any other relevant policies in the local plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/055	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	Given the advanced position that has been reached in seeking to deliver a data centre (as per LBN application ref: 24/00088/FUL) within N4.SA5 and the consent that is now in place in the south of N4.SA5 to deliver residential units and employment floorspace (as per LBN application ref: 23/0655/FUL) ,the site allocation should specifically reflect these uses coming forward.		A change to this policy approach has not been made. We did not consider this change to be necessary as while we acknowledge that the site benefits from this planning permission (which can still be built out), the permission does not change the site allocation requirements. The site allocation included employment uses as one of the priority land uses which would not preclude data centres as an employment use being delivered. However, the acceptability of specific type of employment uses 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-218	IXDS	RPS	Reg19-E-218/056	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	To ensure that the site allocation brief remains compatible with the above, the discussion of development principles as they relate to employment uses should be amended to better enable the delivery of digital and data economy uses and to more accurately reflect the uses permitted by policy in LMUAs. It is understood that Local Mixed Use Areas (LMUAs) are intended to be suitable for either solely employment development or mixed-use employment led development (and not just employment-led development). This needs to be clarified in policy terms. This is indeed confirmed with the Council’s recent evidence base document: ‘Proposed New Employment Land Designation and Boundary Amendments (Regulation 19) (July 2024)’, which, on page 12, with reference to the new LMUA designation for Bidder Street, confirms that “A planning application for a data centre (ref 24/00088/FUL) is currently in on the LMUA and pending for decision. This is considered no conflict with the LMUA designation as data centre is widely accepted as Use Class B8 (subject to wider scrutiny) which is allowed in LMUA, LIL and SIL under the Local Plan”. The site allocation should therefore clearly identify that industrial employment development within the Bidder Street LMUA is suitable for development comprised solely of employment uses. This change is important to ensure that the allowances and limits of the policy can be clearly understood and to ensure that the policy is therefore fit for purpose.	Key to modifications: Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside Development principles Residential, industrial and employment uses and open space. Employment-led development should be delivered in the Local Mixed Use Area (LMUA12 Bidder Street), ~~along with some residential development.~~ Residential uses should also be delivered outside the Local Mixed Use Area (LMUA12 Bidder Street) on the remaining part of the allocation. The employment uses floorspace should ~~be consistent with Local Plan Policy J1 and prioritise light industrial floorspace. The employment floorspace should provide light industrial workspace, as well as workspace for creative and cultural production and digital and deliver for~~ technology industries within the digital and data economy. Open space should also be protected and enhanced on land to the east of Wharfside Road. Development proposals should ensure that flood risk is minimised, mitigated and informed by a site-specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023). ~~Redevelopment of the Local Mixed Use Area can only take place once the maximum achievable throughput of European Metals Recycling (EMR) waste site has been re-provided elsewhere in London. The maximum throughput of P M C Soil Solutions Ltd waste site also needs to be re-provided, either within the site boundary or elsewhere within London. The maximum achievable throughput of the existing waste sites need to be fully reprovided before redevelopment of the existing waste sites can take place, in accordance with London Plan 2021 Policy SI 9.~~ The East London Waste Plan Evidence Base 2022 is being used to inform the update to East London’s Joint Waste Plan. Development should take into consideration the recommendations of the update to the East London Joint Waste Plan, albeit noting that until its adoption London Plan 2021 Policy SI 9 will be used to assess proposals for the redevelopment of waste sites.	The need for clarification of the terminology 'employment-led' development is noted. This has been rectified by adding the following wording to Local Plan Policy J1 and the Glossary: 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. Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met. Glossary: 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. Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-218	IXDS	RPS	Reg19-E-218/057	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	Whilst the Mayer Parry site has previously been identified as a safeguarded waste site, the evidence base for the East London Joint Waste Plan (including the ‘Assessment of Existing Waste Management Capacity’ (July 2024)) does not identify the Mayer Parry site as a site which needs to be protected to safeguard East London’s waste processing capacity. In confirming this status, the site is also not identified in the Regulation 18 Consultation Draft East London Joint Waste Plan (July 2024). The same applies to the neighbouring site within the allocation of ‘P M C Soil Solutions Ltd’. As such, the protected status of the Mayer Parry Recycling Ltd and P M C Soil Solutions Ltd sites pursuant to policy W1, as shown on the policies map, does not align with the emerging East London Joint Waste Plan and this protected status should be removed from both sites.	[Deletions in ~~striketrough text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside] Change to summary table (page 424): Existing uses: Industrial land. ~~Waste management sites identified in the East London Waste Plan Evidence Base 2022 are located within the boundary of the allocation (Mayer Parry, Bidder Street and P M C Soil Solutions Soil Management Facility).~~	The Council notes the proposed modification. This 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 considers an update to the list of safeguarded waste sites, reflecting the safeguarded sites list in the draft East London Joint Waste Plan, could improve the clarity of policy W1 and the site allocations. Therefore, 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 these modifications being made.
Reg19-E-218	IXDS	RPS	Reg19-E-218/059	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	Site allocation N4.SA5 refers to the need for development to safeguard land for a new bridge connection from the Mayer Parry Wharf site to Level Road. Whilst the delivery of this bridge is identified as a project within the Newham Infrastructure Delivery Plan (July 2024) there is not sufficient evidence of the deliverability of this bridge within it and the project’s inclusion within the site allocation is therefore unjustified. In particular, there is no indication that landowner agreements are in place and the technical constraints of delivering the bridge (such as whether there is sufficient land to deliver both the bridge and wharf wall improvements plus specific development buffers that may be identified by the Environment Agency on the Newham side) do not appear to have been explored. The reference to the safeguarding of land for the bridge should therefore be removed unless and until further studies can demonstrate the feasibility of the bridge project. Accordingly, the indicative bridge link as shown on the site allocation map should also be removed.	[Deletions in ~~striketrough text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside] Infrastructure requirements Development should address open space deficiencies by providing a pocket park. This pocket park and wider green infrastructure provision should contribute to creating a southern extension to the publicly accessible Leaway Walk. In addition to the open space provision, development should provide publicly accessible play space, in accordance with Local Plan Policy GWSS5, in the form of a Locally Equipped Area for Play, a Neighbourhood Equipped Area of Play and a Local Area for Play, which should be playable public realm. ~~Development should safeguard land for a new bridge connection from the Mayer Parry site to Leven Road.~~ The site requires a new improvements to and the raising of the river wall.	This wording change is not supported. We did not consider this change to be necessary as LB Newham considers that there is strong evidence for a bridge in this area, as part of the Lower Lea Valley priority bridges programme. This site allocation diagram is indicative, and LB Newham understands that the bridge may / may not come forward on land within IXDS ownership. LB Newham notes that IXDS has signed a section 106 agreement that includes a contribution of £1 million towards the Mayer Parry Bridge. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-218	IXDS	RPS	Reg19-E-218/060	Neighbourhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	The site allocation refers to the Canning Town Riverside site requiring a new river wall. This is not correct and, as per communications with the Environment Agency in relation to planning application ref: 24/00088/FUL, raising of the river wall is considered sufficient to address the requirements of TE2100. The reference to the wall replacement should therefore be removed. The comments from the Environment Agency which indicate the raising of the river wall being acceptable are provided at Appendix B. [please refer to Appendix B attached to representation]	[Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside] Infrastructure requirements Development should address open space deficiencies by providing a pocket park. This pocket park and wider green infrastructure provision should contribute to creating a southern extension to the publicly accessible Leaway Walk. In addition to the open space provision, development should provide publicly accessible play space, in accordance with Local Plan Policy GW55, in the form of a Locally Equipped Area for Play, a Neighbourhood Equipped Area of Play and a Local Area for Play, which should be playable public realm. ~~Development should safeguard land for a new bridge connection from the Mayer Parry site to Leven Road.~~ The site requires a new improvements to and the raising of the river wall.	The Council’s objective for this policy approach is to ensure Environment Agency requirements in relation to the river wall are considered in decision-making on the application. However, 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 upgrade to the new river wall.
Reg19-E-218	IXDS	RPS	Reg19-E-218/061a	Neighbourhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	With regard to the map of the site allocation on page 425, it is not clear why the eastern edge of the site (fronting Bidder Street) is not shown as having opportunities for public realm improvement. This element should therefore be added to the map of the site allocation. [As discussed above, the indicative bridge link should also be removed from this map.]	Site Allocation Map changes: An ‘Opportunity for public realm improvement’ to be added along the eastern edge of the site (Bidder Street frontage). [The bridge and key route associated with it should be removed.]	A change to this policy approach has not been made. 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. The quantum of open space is informed by the Newham Green and Water Infrastructure Strategy. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/061b	Neighbourhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes	[With regard to the map of the site allocation on page 425, it is not clear why the eastern edge of the site (fronting Bidder Street) is not shown as having opportunities for public realm improvement. This element should therefore be added to the map of the site allocation.] As discussed above, the indicative bridge link should also be removed from this map.	Site Allocation Map changes: [An ‘Opportunity for public realm improvement’ to be added along the eastern edge of the site (Bidder Street frontage).] The bridge and key route associated with it should be removed.	This wording change is not supported. We did not consider this change to be necessary as LB Newham considers that there is strong evidence for a bridge in this area, as part of the Lower Lea Valley priority bridges programme. This site allocation diagram is indicative, and LB Newham understands that the bridge may / may not come forward on land within IXDS ownership. LB Newham notes that IXDS has signed a section 106 agreement that includes a contribution of £1 million towards the Mayer Parry Bridge. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/062	Neighbourhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Yes	No						Yes		[Deletions in ~~strike through text~~ Additions in <u>underline text</u> “N4.SA5: Canning Town Riverside] Phasing and implementation Short to medium term. Phasing of the site should take account of the likely requirement for water supply upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.”	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-234	Places for London		Reg19-E-234/016	Neighbourhoods	N4 Canning Town	N4.SA4 Limmo					Blank	No						Blank	Building heights The approach to tall buildings in the Limmo site allocation is unsound for the reasons set out above. Our proposed modifications to the site allocation text are set out below to address and are explained and justified in our representation on draft Policy D4 above, so the rationale and evidence does not need to be repeated again here.	Our proposed modifications are below: Design principles Appropriate Building heights should range between 21-32m (ca.7-10 storeys) with taller buildings ranging from up to 60m to 100m (ca. 20 to 30 storeys) adjacent to the railway line and open space. Above the bus station, development should range between 19-42m (ca. 6-13 storeys). Explanation / justification for modifications: The rationale for the building height changes are in line with our proposed modifications to the draft tall buildings policy.	This wording change is not supported. Your comments regarding policy D4 are addressed separately. In relation to site allocation design principles, we did not consider this change to be necessary as, based on the methodology used to identify suitable locations and heights for tall buildings, N4.SA4 Limmo site allocation is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan. More details on the methodology used to identify suitable locations and height 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.

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

constraints, as well as the adjacent pylons and overhead high voltage cables will also inevitably influence the layout of buildings and the public realm.

In summary, an appropriate degree of flexibility in design is essential. We do not consider that the draft Local Plan should seek to dictate the overall layout approach to the public realm and open space on the site. This should be established through a contextual, site specific design-led masterplanning exercise.

Reduced Limmo site allocation boundary and surrounding developments

We consider that it is essential to take into account the reduced (from the current adopted local plan) Limmo site boundary and note the significant open space provision coming forwards in the wider area, which the Limmo development would contribute towards.

There is a current permitted proposal to provide approximately 0.5 hectares of new public open space on land to the south of the Lower Lea Crossing (adjacent to the proposed Limmo allocation site) as part of the Thameside West development which is owned by GLAP (LPA Ref: 18/03557/OUT). This is subject to a live Reserved Matters Application – refer to the Leaway Park RMA (LPA Ref: 24/01507/REM). This land forms the southern section of the existing Limmo site allocation.

This section of the Leaway Park is partly on TfL-owned land and will contribute towards meeting the need for open space in the area, taking into account both the existing neighbourhoods and planned developments. We therefore consider that the Limmo allocation site should include public open space to address the balance (approximately 1.5 hectares).

In summary, there is no need for the entire 2-hectare requirement to be accommodated on the Limmo site allocation to satisfy identified need. Part of the open space requirement could be delivered on adjacent land if this is suitable and deliverable. The Limmo site allocation should then be expected to deliver the balance. This would ensure that the required quantum of new open space provision delivered in this area to address the identified local need.

This alternative approach would better reflect the revised Limmo site boundary and address the following site overlap issues created by the Thameside West planning permission:

- The site boundary for the Thameside West permission includes a 0.5 hectare sized area of TfL-owned land to the south of the Lower Lea Crossing.
- This land forms part of the Limmo Peninsula site allocation (S18) within the current adopted Newham Local Plan (2018). However, it is removed from the draft Local Plan site allocation boundary.
- There has therefore been a material change in circumstances as a result of our

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			reduced site allocation boundary, which should be recognised. • The removal of this 0.5 hectares area of land creates a number of issues for the Limmo Peninsula development in terms of the potential for open space provision. • Previously, this land was included in the 2020 CLL / FCB masterplan for the Limmo Peninsula site and made a significant contribution towards open space provision and our ability to deliver a 2-hectare local park. This area of TfL-owned land made a contribution of approximately 4,300 sqm towards public open space provision across the Limmo site, accounting for approximately 22% of the site’s overall public open space offer in the previous 2020 masterplan. It should be noted that this is not in any way a downgraded open space offer. There would be no material change to open space provision proposed; the area identified would still continue to be provided as public open space, linking into the Limmo site development below the Lower Lea Crossing. Its phasing brought forwards compared to the original Thameside West permission. The Canning Town area is in deficiency of open space, as set out in the Council’s evidence base. However, it should be noted that this situation would be transformed in the future once the public open space proposed on various development sites is provided, including at Limmo Peninsula, City Island and Thameside West. TfL and GLAP ownership: [see image in the representation] 0.5 hectare area of TfL-owned land removed from the current 2018 site allocation boundary: [see image in the representation] Thameside west outline planning permission site boundary: [see image in the representation] Leaway Park RMA Design and Access Statement (July 2024): [see image in the representation]		

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-234	Places for London		Reg19-E-234/019	Neighbou rhoods	N4 Canning Town	N4.SA5 Canning Town Riverside					Blank	No						Blank	While we are supportive of increasing open space in the borough, it is incorrect to identify the TfL land adjacent to Wharfside Road, Bidder Street and Newham Way for site location plan as an opportunity for Green Space. This site has electrical infrastructure on it in the form of a pylon which significantly limits the opportunity for the delivery Green Space on the site. Further to this, the site is an appropriate location for an electric vehicle charging hub as it is adjacent to Newham Way which is a major arterial route in the borough and has existing vehicular access. An Electric Vehicle Charging Hub in this location would meet the objectives which are set out in Policy T3: Transport Behaviour Change of the Draft Local Plan by increasing the number of electric vehicle charging points in the borough and would also align with the Mayors Transport Strategy. We recommend that the drawing is altered to remove the identification of an opportunity of green space in this location and opportunity for an electric vehicle charging hub is instead identified. This would also be in line with previous pre-application advice we have received from the borough regarding an electric vehicle charging hub on this land.	Amendments should be made to the site allocation map to remove the green blob 'opportunity for green space'. A symbol should be added to this location on the map to highlight the potential for this land to accommodate an electric vehicle charging hub, in line with the Mayor's Transport Strategy.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as 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. The quantity and type of green space stipulated in each of the Local Plan's site allocations has been informed by the 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 in accordance with Policy GWS1 and BFN2. The preferred location of electric vehicle charging hubs is not a level of detail which is reflected in the Local Plan site allocation diagrams. This would be a detail which would be addressed during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/074	Neighbou rhoods	N5 Custom House	N4.SA5 Canning Town Riverside													We welcome the following in the Infrastructure Requirements for site N5.SA1: 'Development should re-provide bus-standing and drivers' facilities on the south-western part of the site.'		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/086	Neighbourhoods	N5 Custom House	N5.SA1 Custom House Land surrounding Freemans Road					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/087	Neighbourhoods	N5 Custom House	N5.SA1 Custom House Land surrounding Freemans Road					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/088	Neighbourhoods	N5 Custom House	N5.SA1 Custom House Land surrounding Freemans Road					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/089	Neighbou rhoods	N5 Custom House	N5.SA2 Custom House Coolfin North					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/090	Neighbou rhoods	N5 Custom House	N5.SA2 Custom House Coolfin North					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/091	Neighbou rhoods	N5 Custom House	N5.SA4 Royal Road					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N5.SA4 Phasing and implementation: Phasing of the site should take account of the likely requirement for water supply wastewater infrastructure upgrade, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.
Reg19-E-033	Thames Water		Reg19-E-033/092	Neighbou rhoods	N5 Custom House	N5.SA4 Royal Road					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N5.SA4 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply wastewater infrastructure upgrade, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/093	Neighbourhoods	N5 Custom House	N5.SA4 Royal Road					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/094	Neighbourhoods	N5 Custom House	N5.SA3 Custom House Land between Russell Road and Maplin Road					Blank	No						Blank	[Water Response] On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/095	Neighbourhoods	N5 Custom House	N5.SA3 Custom House Land between Russell Road and Maplin Road					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/034-j	Design	N5 Custom House			Table 1 Tall Building Zones												[Annex 3 Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments] Ref: N5 Area: Custom House Height Limit: Up to 50m Comment: Any development above 49m should be subject to an OLS & ILS analysis. All development above ground should be subject to an independent IFP assessment. Proposed Mitigation: Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan Policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. 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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ12: Custom House] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-200	London City Airport		Reg19-E-200/054	Neighbourhoods	N5 Custom House			Up to 50m											Any development above 49m AGL should be subject to an OLS & ILS analysis. All developments above ground level should be subject to an independent IFP assessment	Tall buildings in this precinct should be subject to an OLS & ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.	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. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. 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. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the neighbourhood section. However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the vision section: [15. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.] which is included in the modification table.
Reg19-E-013	Transport for London		Reg19-E-013/075	Neighbourhoods	N6 Manor Road														[West Ham station may require interventions to address crowding and increase capacity because platforms are currently accessed by a single stairway. This should be added as an infrastructure requirement for N7 sites. Station improvements will need to be funded through development contributions or other funding sources because TfL is not currently able to commit funding.] We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7).		Comment noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/030	Neighbourhoods	N6 Manor Road						Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan(part 10) [see Appended – Regulation 18 Draft Local Plan SEGRO response], namely part 2 of Policy N6 states that the vision for Manor Road will be achieved by: “Supporting the delivery of new residential moorings in suitable locations with appropriate ancillary facilities;”		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-C-049	Jahid		Reg19-C-049/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-049	Jahid		Reg19-C-049/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-050	Yunoos Sulaiman		Reg19-C-050/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively.The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community.		Comment noted.
Reg19-C-050	Yunoos Sulaiman		Reg19-C-050/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved.	Comment noted.
Reg19-C-054	Umair Zulfiqar		Reg19-C-054/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	Yes						Yes	Community Trust Land on the Abbey Mills should be given specail consideration due to a long history of litigation and neglect		Comment noted.
Reg19-C-054	Umair Zulfiqar		Reg19-C-054/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	Yes						Yes		Contamination of land and the clasification of "Grey belt " should be looked into when making reference to the Abbey Mills site due to historic contamination	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. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-055	Mohmed Hanif Aya		Reg19-C-055/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The property is legally owned by riverine centre and they should build what the needs of the community.		Comment noted.
Reg19-C-055	Mohmed Hanif Aya		Reg19-C-055/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		They should no imposing of a park and a pathway through the middle of the property/land. The pathway should on the edge of the land.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-056	Rafiq natha		Reg19-C-056/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	As we know Newham has diverse community. This plans fails look out for the needs for the local community. The plans only serve to meet requirements of the new apartments to be made. Current premises is too small and inadequate to meet the needs of the growing community in particular women and children	The proposed plan limits the size drastically limiting it's use for local worshippers.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-057	Anwar Alam		Reg19-C-057/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The council and government should allow the riverine centre build the community needs.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-057	Anwar Alam		Reg19-C-057/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The pathway should be on the edge on the land not in the middle. The park should not be imposed on the riverine centre.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-058	Ghulam Ibrahim Nekiwala		Reg19-C-058/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The government should not force plans on a charity organisation	The plans of the government are fulfilling the needs of the community.	Comment noted.
Reg19-C-059	Sarfaraz Mohmed Chhata		Reg19-C-059/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The government should not force plans on a charity organisation	The council and government should not force a park and the pathway should not be in the middle of the land	Comment noted. 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.
Reg19-C-060	Maaz Vohra		Reg19-C-060/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The charity organisation needs to build community facilities for women and youngsters.	The government should force plans on a charity organisation	Comment noted.
Reg19-C-061	Masira vohra		Reg19-C-061/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Please don’t force the charity.	Please make this path-way around the edge of the land.	Comment noted. 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.
Reg19-C-062	Fahad Vohra		Reg19-C-062/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Please don't force the riverine centre into plans they dont agree with.	Please place the pathway on the edge of the land. The riverine centre needs to build for women, disabled and the youth.	Comment noted. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-063	Iqbal ravat		Reg19-C-063/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Plans do not cater needs of the growing local community. Current plans means the future mosque would not be an adequate size to meet the needs of community including women and children		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-063	Iqbal ravat		Reg19-C-063/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The key route would reduce the size of future plans. Proposed drafts fails to make use of the lands potential. Council should co operate with stakeholders and cater plans such as housing	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-064	Vahora fahad		Reg19-C-064/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Please don't force your plan to charity organisations.	Charity wants to make a building for community purpose including children and women for all religions, please put the pathway on the edge of land	Comment noted. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible.
Reg19-C-065	Faizan vahora		Reg19-C-065/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Please our charity is helpful for all human beings specially youngster's. So please don't force charity.		Comment noted.
Reg19-C-065	Faizan vahora		Reg19-C-065/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Make this path way at the edge of the land.	Comment noted. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-066	KAMILBHAI FARUKBHAI VAHORA		Reg19-C-066/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The government should not force their plans on a charity organisation	The land should be used for community needs for women, youngsters and disabled individuals	Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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, children and disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-067	Atik vohra		Reg19-C-067/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Charity helps people. Don't force.	Make it around the edge of the land.	Comment noted. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-068	Sohel		Reg19-C-068/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Plans do not cater for needs diverse local population. It serves only the plans proposed by council. Current site can not fulfill the need of local population		Comment noted. The development principles section of the site allocation directs the reader to Local Plan Policies S11, S12 and S13 for the delivery of social infrastructure. Policies S11 and S12 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. Policy S11 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. Local Plan Policy S12 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 Twelvetreets Local Centre. Policy S12 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy S12 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 S12. Policy S12 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 S12.1 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. Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-068	Sohel		Reg19-C-068/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Key route severley impacts the size of current site, and does no utilise the lands potential, for much needed community housing developments	Comment noted. 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.
Reg19-C-069	Zamil mansuri vahora		Reg19-C-069/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Charity helps everyone. Don't force charity.		Comment noted.
Reg19-C-069	Zamil mansuri vahora		Reg19-C-069/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Place path way at the edge of the land.	Comment noted. 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.
Reg19-C-070	Vahora Muhammadj unedbhai firoj bhai		Reg19-C-070/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	It's an already charity organisation please, place so please do not force charity organisation to put your plan.	Charity organisation has a plan to make community centre and it's benefit other to other people as well.	Comment noted.
Reg19-C-070	Vahora Muhammadj unedbhai firoj bhai		Reg19-C-070/002	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	There is already charity organisation has a plan to make a community centre to benefit the people so don't force charity organisation to make your plan	Charity organisation is already planned to make a community centre to benefit other people so please for women disabled people you children.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-071	Mohammed safavan vojra		Reg19-C-071/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-071	Mohammed safavan vojra		Reg19-C-071/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No		The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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.
Reg19-C-072	Raashid masroor		Reg19-C-071/002	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	Yes						Yes	Current proposal does not meet the meeds of the growing local community	Current proposals limits the size of current site which does not meets needs of local population	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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.
Reg19-C-073	Mohammad arsh vahora		Reg19-C-073/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Charity organisation has a plan to build a community centre, so please do not force charity organisation to build a park.	The organisation has already planned to build a community centre to benefit all people, including the woman, disabled people, children, etc.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-074	Zhuber khan		Reg19-C-074/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-074	Zhuber khan		Reg19-C-074/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No		The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.	Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-074	Zhuber khan		Reg19-C-074/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-074	Zhuber khan		Reg19-C-074/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-075	Ali Raza syed		Reg19-C-075/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-075	Ali Raza syed		Reg19-C-075/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No		The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-075	Ali Raza syed		Reg19-C-075/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No		The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-076	Aminur Rahman		Reg19-C-076/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						Yes	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-076	Aminur Rahman		Reg19-C-076/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						Yes		The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-076	Aminur Rahman		Reg19-C-076/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						Yes		The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-077	Khalid Umer		Reg19-C-077/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The existing facilities are wholly inadequate for the community it serves, the size of the current mosque on site is too small to accommodate the number of worshippers that attend the space in particular women and children. Building a mosque that is of a similar size will not address the needs of the community it serves. The lack of space hinders the inclusivity of all participants of our community. Due to these inadequacies members of our community are often forced to find alternative places of worship further preventing the development of a strong community spirit. The borough of Newham has a long upstanding value of diver And inclusion which is not reflected in the draft proposal.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-077	Khalid Umer		Reg19-C-077/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		There is a need for greater collaboration with the Muslim community that the site serves, the community is willing to, even eager to collaborate with all relevant Stakeholder's to ensure a positive solution which will benefit all parties involved.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-077	Khalid Umer		Reg19-C-077/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		We would welcome a needs assessment to be carried out which reflects the growing needs of the community. An example of this would be the need for facilities needed for those with disabilities within our community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-077	Khalid Umer		Reg19-C-077/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The draft proposal also alarmingly does not fully utilise the potential for much needed housing or larger facilities for worship which are seen in several parts of the country and within London itself. The site also has the potential to stimulate economic growth within the construction industry bringing with it local employment opportunities. However the issue of the key route has not been adequately addressed to align with housing needs and economic growth.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-078	Mohammed Asif		Reg19-C-078/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	1st section Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-078	Mohammed Asif		Reg19-C-078/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-079	Soheel Pirbhai		Reg19-C-079/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This plan does not take in to the needs of the growing local community. It appears to cater for only new luxury flats which are currently being built next to the site. Further discussion is required on better use of the site to include affordable housing, educational centres as well as worshiping facility. The plan looks reduce the current facility. The plan should take in to account that the current center is a hub for the community which provides a congregational space like no other in east london. It needs to be further developed in order to continue to provide services which improves the lives of young and old people.	The current plans will remove the ability to develop a permanent functional community and religious space on the site. The site can be used for affordable housing as well as the community center	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-080	Abdul		Reg19-C-080/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No	The London borough of Newham has a diverse and multicultural community that coincides and lives in peace and harmony with each other, however I believe the local plan for N7 SA1 fails to fully cater for the needs of the Newhams diverse community. The plan seems to solely serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs and not the needs of the whole community. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-080	Abdul		Reg19-C-080/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	No						No		By implementing the key route proposal, the potential for future facilities to meet the needs of all local worshippers would be severely limited. The draft proposal does not fully utilise this opportunity by taking into account the land's huge size and great potential to build thousands of affordable homes, a libraries, education hubs, fitness centres which will be all eco friendly. This will help ease and take the strain off the homeless situation in newham and provide hundreds of people with new jobs. The current plan does not give the land of the abbey mills mosque it's due rights and neither does it help enable the owners to use the land to its absolute full potential in order to benefit the wider diverse community and further enable social cohesion where everyone is welcome not only Muslims but people of all faith/religions and no faith/religions.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-081	Samim Kulsum		Reg19-C-081/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I plan is better suited for a local prayer facility and a community centre for the community	It is already a prayer facility, serving the community	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-083	FARUK KHAPEE		Reg19-C-083/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	no female facility in Newham impacted by equality act 2010 policy failing on duty to cooperate	allocate land use for community mosque and housing adapt diversity in town planning engage with community faith leaders	Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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. It should be noted that the Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-084	Muhammad Osama		Reg19-C-084/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Plan is inconsiderate of large Muslim community coming in for daily prayers	The area of green land should be used for the purposes of the mosque facilities solely	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-085	Muhammad Fahad		Reg19-C-085/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This plan fails to meet the current needs of the local community. The site is used by the Muslim community visiting the mosque 5 times a day and the masjid acts as an important community platform for all Muslims residing nearby. The plans are not cooperative at all and will adversely impact the Muslim community.	Curent proposal of size of masjid is unacceptable, it needs to be bigger. Affordable Homes should be prioritised which is something that is much needed.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-086	Samir hashmi		Reg19-C-086/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Don’t force please. We need our charity to be still there for our religion.	Place the path way at the edge of the land.	Comment noted. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-087	Soyeb Patel		Reg19-C-087/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-087	Soyeb Patel		Reg19-C-087/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-C-087	Soyeb Patel		Reg19-C-087/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Additionally, we would like to address the inflexibility of the current policy regarding the size of the facilities. We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-087	Soyeb Patel		Reg19-C-087/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		There is a lack of purpose-built facilities for individuals with disabilities. These facilities would help the socially isolated elderly population connect with others. The draft proposal does not fully utilize the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately-owned land has been acquired to meet the future needs of the community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities of. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-087	Soyeb Patel		Reg19-C-087/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-088	Najwa Zaman		Reg19-C-088/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Yes	Yes						Yes	Not applicable	Not applicable	No comment.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-089	Shabbir Master		Reg19-C-089/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham is a diverse community and the plan is not suitable for locals. Current facilities serving big number of locals.	Suggested plan wil restrict the future facilities for worshippers men women and youngsters.	Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-090	Umar Razzaq		Reg19-C-090/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham has a very diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed in neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-090	Umar Razzaq		Reg19-C-090/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-090	Umar Razzaq		Reg19-C-090/001b	Neighbours	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-091	Muhammad Zaman		Reg19-C-091/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Local plan is inconsiderate of existing Muslim population utilizing space for daily prayers - therefore it should be void.	Consult the mosque committee and management before carving new plan for developments in the green space - it is critical that the operations and facilities of the mosque remain highest priority.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-C-092	Fahmida Ismail		Reg19-C-092/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The land in question was privately acquired by the local Muslim community for the specific purpose of establishing a mosque, partly due to the council's failure to provide adequate facilities for the local Muslim population. Any attempt to draft or implement plans affecting this land without consulting the landowners, or without considering the interests and concerns of the local community, is both improper and unacceptable. Such actions may constitute contempt and carry potential legal consequences. It is crucial that the land's intended purpose is respected, and meaningful engagement with all relevant stakeholders takes place before any further actions are considered.	It is crucial that the land's intended purpose is respected, and meaningful engagement with all relevant stakeholders takes place before any further actions are considered.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-093	Iqra Zaman		Reg19-C-093/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs. The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-C-093	Iqra Zaman		Reg19-C-093/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-093	Iqra Zaman		Reg19-C-093/001b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/076	Neighbourhoods	N7 Three Mills														[Comments on West Ham station in N6 also apply to this area. The primary vehicle route which connects to Manor Road and is shown on the plan as a dotted line has, in the past been, been questioned by DLR colleagues due to concerns about the quality of bridge structures.] We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7)		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/077	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													We welcome the inclusion of the following in the infrastructure requirements for site N7.SA1: ‘Development should provide an improved bridge connection to West Ham Station.’ ‘Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations.’		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/078	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills														To ensure that potential future options for increased capacity at West Ham station can be accommodated an additional requirement should be added as follows: ‘A small area of land to the north west of West Ham station should be reserved to enable additional station capacity to be provided in the future.’ Expansion to the north west is the only option to help enable additional station capacity as the station is restricted by development on all other sides of the station.	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. However, the Council recognises the importance of ensuring that the Plan is effective, and has therefore drafted the following modification to policy which will be presented to the Inspector for their consideration: Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations. 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.
Reg19-E-013	Transport for London		Reg19-E-013/079	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													We welcome the inclusion of the following in the infrastructure requirements for site N7.SA2: ‘Development should provide a new bridge connection to the entrance of West Ham Station and two footbridges across Manor Road.’		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/080	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce						No							We also welcome the following infrastructure requirement although for soundness we recommend the alteration shown in red ‘Development should contribute to active and public transport upgrades, including access for bus services, bus standing space as well as access to, and capacity at, West Ham Station.’		This wording change is not supported. We did not consider this change to be necessary as Local Plan Policy T1 makes specific reference to protect bus stands. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/081	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													We welcome the inclusion of the following in the design principles: ‘Routes through and to and from the site should improve access and connectivity to West Ham Station, N7.SA1 Abbey Mills, the Twelvetreets Local Centre and the Manor Road neighbourhood.’		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/082	Neighbourhoods	N7 Three Mills	N7.SA3 Sugar House Island													We welcome inclusion of the following in the design principles for site N7.SA3: ‘Routes through and to and from the site should improve access and connectivity across the waterways and provide a new bus route through the site. Development should improve walking and cycling conditions on the Stratford High Street...’		Support noted.
Reg19-E-014	CPRE		Reg19-E-014/008	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed: 3. Significant new green spaces should be created and existing parks designated as follows.] • A major new park in the west: N7.SA1 (partially MOL) – <u>site north of Crows Road</u> – this is allocated for residential, open space and community floorspace but no detail is given on proportions. This is well connected to neighbouring sites which are still green and it (or a significant part of it) should be set aside for a large green open space / habitat – connected with neighbouring sites etc.		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.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.
Reg19-E-014	CPRE		Reg19-E-014/009	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed: 3. Significant new green spaces should be created and existing parks designated as follows. • A major new park in the west:] Added to this, N7.SA2 (designated a SINC) – <u>the gas holder site</u> in the west of the borough should be safeguarded for conversion to green open space or tree planting (see below). And <u>the waterworks site at Abbey Lane / The Greenway</u> should be opened up and allocated for an accessible green / open space.		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 Twelvetreets 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.
Reg19-E-014	CPRE		Reg19-E-014/015	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													8. Specific site allocation comments • N7.SA1 (partially MOL) – This is well connected to neighbouring sites which are still green and we’re pleased to see part of it set aside for a large green open space / habitat – which could connect with neighbouring sites.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-014	CPRE		Reg19-E-014/016	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													[8. Specific site allocation comments] • N7.SA2 (designated a SINC) – gas holder site. There is a huge opportunity to safeguard this in its entirety or at a minimum safeguard a larger section for open space and/or habitat.		Comment noted.
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/003	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													In terms of context, the Site is currently allocated (S10 – Abbey Mills) under the adopted Local Plan for the provision of a community use (‘faith-based’) alongside buildings within a mix of residential and employment generating uses of between 8 – 12 storeys. It is noted that the Site Allocation for Abbey Mills as set out in the current Local Plan is to be carried over to the new Local Plan – which is encouraged. That being said, and disappointingly, the Council is seeking to set very similar parameters from the current allocation to the emerging one (N7.SA1 – Abbey Mills), most notably: - • Development should replace the existing temporary community use with the equivalent amount of community floorspace, meeting the requirements of Draft Local Plan Policy SI1.		Comment noted.
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/003a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													• Building heights should range between 9 - 21m (ca. 3-7 storeys) with taller buildings up to 40m (ca. 13 storeys) to aid wayfinding. Massing should step down towards the west of the site to sensitively integrate with the heritage assets. Buildings should be set back from the watercourse to avoid overshadowing impacts.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/004	Neighbou rhoods	N7 Three Mills														As will be discussed below, this is disappointing given that there appears to have been no targeted objectively assessed needs assessment specific to the replacement community facility informing the policy and the draft allocation pays little or no regard to the drastically changing character of the wider area from a townscape perspective.		Comment noted. Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The type of development that comes forward will be managed through the design principles in the relevant site allocations as well as Local Plan policy D4 Design-led residential site capacity optimisation, which has been informed by robust evidence base such as the Newham Characterisation Study and Tall Building Annex.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/005	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													As per the requirements of paragraph 35 of the NPPF, Newsteer, on behalf of our Client provides the following representations: - We consider that the draft allocation N7.SA1, as currently worded is not acceptable.	[moved from comment to propsoed modification] Our Client wishes to focus on two specific areas of the draft allocation and requests the following amendments: 1. For it to recognise that there could reasonably be a scenario where the replacement community facility could be larger than the existing temporary facility and that until a robust needs based assessment has been carried out, it would be premature to be so prescriptive on the floorspace.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/006	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													As per the requirements of paragraph 35 of the NPPF, Newsteer, on behalf of our Client provides the following representations: - We consider that the draft allocation N7.SA1, as currently worded is not acceptable.	[moved from comment to propsoed modification] Our Client wishes to focus on two specific areas of the draft allocation and requests the following amendments: 2. For it to recognise that the opportunity exists to make a case for additional height across the Site, subject to further testing. The height range given is not reflective of the changing nature and character of the area, particularly in light of the Parcel Force Depot (hereafter the ‘Parcel Force’ site) development (which is currently under construction) and the Councils latest housing position. There does not appear to be any ground for such a prescriptive restriction and development should be design-led.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the sieving exercise undertaken to identify suitable location for tall buildings across the borough and, due to its sensitive location in proximity to the Three Mills Conservation Area, the N7.SA1 Abbey Mills site allocation is not considered suitable to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that we have adopted an appropriate balance between meeting housing need and protecting heritage assets. The Council considers that this policy approach is sound.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/007	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills												Community Use Paragraph 96 of the NPPF sets out that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which (inter alia) promote social interaction through, for example mixed use developments and strong neighbourhood centres. Paragraph 97 in particular seeks to provide the social, recreational and cultural facilities and services the community needs. It goes on to state that planning policies and decisions should (emphasis added): - a.plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b.take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c.guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs; d.ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e.ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. In 2015 a briefing document (Faith Groups and the Planning System2) was prepared by the University of Roehampton, the University of Wales, Cardiff and the Arts & Humanities research Council on behalf of the Faith and Place Network (FPN). This document, endorsed by the Royal Town Planning Institution and presented before the House of Commons recommends that councils should prioritise protecting space for social infrastructure, including places of worship. The document sets out that local planning authorities need to develop a greater understanding of how faith groups use space, which includes the difference between and within faith groups themselves. It also sets out that faith groups should take a more active involvement in the development of council local plans to ensure their views are included in the consultation process. Draft Policy S11 (Existing community facilities and health facilities) sets out that in general terms 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 there is no longer a need. Draft Policy S12 (New and re-provided community facilities and health facilities) is also predicated on there being an unmet demand which is to be justified via a ‘needs-based assessment at the time of delivery’. In this respect the aims of the policy match those of NPPF Paragraph 96 and 97. The site allocation as drafted however does not recognise the current landowners and their longstanding (and well documented) intentions for the Site,	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			and the requirement for the replacement ‘community use’ to be of an equivalent amount of existing floorspace only is too prescriptive. Indeed, this does not follow the needs based assessment approach required by draft Policy S12 nor the requirements of NPPF Paragraph 97 parts a – d wherein local plans should plan positively for such uses, taking into consideration (amongst other matters, ‘need’).		
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/008	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													It has long been the case that the existing mosque is running over capacity to a point where worshippers are regularly being turned away. Whilst our Client accepts that any replacement facility should be predicated on a ‘needs’ basis, we consider the current wording to be overly onerous by limiting its size to replicate the existing. In our opinion this is too prescriptive and does not allow for current need and future demand – which is yet to be fully determined.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/10	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Indeed, paragraph 6.3.1 (Provision of Services) of the 2022 Needs Assessment sets out that from the e-questionnaire results (Listen and Discover) that “Worship and prayer spaces were stated as being too small, particularly, Muslim worship”. Furthermore, at paragraph 6.4.1 (Level of Use), 39% of respondents included places of worship as community facilities operating at a ‘high level of use’. No further evidence appears to exist to demonstrate the actual needs of the community beyond the findings of the generalised Needs Assessment. In this respect it is the Applicant’s intention to commission such a study in conjunction with the local community, the methodology of which will be agreed in writing with the Local Planning Authority prior to the submission of any planning application. The aim of the study will be to accurately record the numbers of male and female worshipers attending a targeted number of Mosques on a mix of high holy days and regular prayer days; using professionally coordinated field staff to visually count and record the statistical data. Only once such a study has been completed will a genuine need be determined. To therefore put a ‘cap’ on the floorspace without such an evidence base would not result in a positively planned site allocation. To this end, the policy, as drafted, is not flexible. We therefore recommend the following change to the second paragraph of the allocation: - “Development should replace the existing temporary community use with the equivalent amount of community floorspace to meet the needs of the community, the floor area of which is to be objectively assessed and agreed through a dedicated needs-based assessment, whilst meeting the requirements of Local Plan Policy SI1.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/11a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													In turning to the Site itself, the surrounding context in terms of built form has fundamentally changed since the adoption of the December 2018 Local Plan, as too has the Mayor’s approach to delivering housing within the most sustainable locations across London. It is also the case that the Site is within an area of low townscape sensitivity and that it is large enough to develop a character of its own, and that the inclusion of high-quality tall buildings have the potential, alongside the Parcel Force site to enhance the townscape and the legibility of the area. It is important to note here that planning permission was granted on 16 August 2018 at the adjacent Parcel Force site (17/01847/OUT) for a mixed-use development providing in excess of 1,000 residential units within buildings extending to a maximum of 28-32 storeys. This is despite the Parcel Force site being allocated within the 2018 Local Plan (S11) to provide building heights of 8-12 storeys, but up to 19 storeys around West Ham Station. The draft allocation for this site (N7.SA2) sets height parameters of between 3 – 33 storeys across the site – with the latter in defined locations to add wayfinding and with consideration given to marking the local centre. Within the committee report recommending the 2018 application for approval the Council presented the case that despite the scale and massing being contrary to the policies set out within the then adopted local plan (Policies SP4 and SP8) that the pressing need to deliver more homes in London and together with the beneficial S106 package of infrastructure, a new school and affordable housing proposed, Officers favoured, on balance (in particular against the less than substantial harm afforded to the setting of nearby heritage assets), a view in support of sustainable development in accordance with the NPPF. Since the granting of 17/01847/OUT there have been numerous non-material amendments to the approved Parcel Force development – including a pending application from June 2024 (24/01442/NONMAT) which, if approved, will increase the heights of Block D by 8 storeys and Block F by 3 storeys. For completeness, Block F will extend to 29 storeys (from 26 storeys) and Block D will extend to 22 storeys (from 14 storeys).	Comment noted.	

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/11b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													In light of the Parcel Force development and the proximity to West Ham station, we consider that a compelling case may be made at this stage of the Local Plan process to justify building heights in excess of those set out within current allocation S10 and emerging allocation N7.SA1 – particularly as the allocation calls for an improved bridge connection to West Ham Station. In this respect, and as per the case for the Parcel Force site, it would be sensible to assume that the redevelopment of the Site could very reasonably represent an efficient re-use of a brownfield site that benefits from good access to public transport accessibility which will improve further due to the transport infrastructure proposed by the allocation.		The submission Local Plan has been informed by a 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. In line with London Plan policy D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/12	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													From a heritage perspective, and whilst any application would need to be fully assessed on its own merits, Historic England (and the Council) previously took the view at the Parcel Force site that all likely effects in terms of Townscape, Visual Impact and Built heritage were considered beneficial or neutral. Again, whilst we would fully anticipate any planning application to be supported by a full Environment Statement (to include full and proper consideration to all heritage and townscape constraints) it is reasonable to assume that heights up to (and possibly in excess) of 19 storeys could be achieved towards West Ham Station.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the sieving exercise undertaken to identify suitable location for tall buildings across the borough and, due to its sensitive location in proximity to the Three Mills Conservation Area, the N7.SA1 Abbey Mills site allocation is not considered suitable to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/13	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills							No						To this end, the policy, as drafted is neither flexible nor positively planned as it fails to take account of the significant development under construction located to the immediate south at the Parcel Force site, nor does it allow for the recommending flexibility set out elsewhere in the draft Local Plan that new development should be 'design-led' (draft Policy D3).	We therefore recommend the following change to the sixth paragraph of the allocation: - "Building heights should be range between 9 - 21m (ca. 3-7 storeys) ~~with taller buildings up to 40m (ca. 13 storeys) to aid wayfinding~~ and between 21 – 32m (ca. 7 – 10 storeys) in the rest of the site with taller buildings up to 32m (ca. 10 storeys), 50m (ca. 16 storeys) and 100m (ca. 33 storeys) in defined locations to aid wayfinding in defined locations with consideration given to marking the linkages to the West Ham Station and Twelvetreets Park and Former Bromley By Bow Gasworks. Massing should step down towards the west of the site to sensitively integrate with the heritage assets. Buildings should be set back from the watercourse to avoid overshadowing impacts".	This wording change is not supported. We did not consider this change to be necessary as the Council considers the policy to be positively prepared and in conformity with the 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. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". Based on the sieving exercise undertaken to identify suitable location for tall buildings across the borough and, due to its sensitive location in proximity to the Three Mills Conservation Area, the N7.SA1 Abbey Mills site allocation is not considered suitable to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that the plan remains sound without the proposed changes.
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/14	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills				The map									'Other' We have identified that the Regulation 19 draft site allocation identifies on the accompanying Map that the 'Proposed Pedestrian Route / Proposed Primary Vehicle Route' as appearing within the Regulation 18 Map has been re-labelled as a 'Key Route'. Whilst our Client is not against a route in principal terms (in the in interests of enhancing accessibility and facilitating placemaking), it is not currently accepted that the route, as shown, is the optimum route as this is likely to impact upon the delivery of the community facility. Whilst this is ultimately a matter for the detailed design stage this point is raised now on the basis that the Key to the Map should be altered to reflect that the route is 'indicative only'.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/15	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Conclusion These representations are submitted to the London Borough of Newham on behalf of our client, in relation to the site known as ‘Abbey Mills’ - N7.SA1. We are encouraged to see the site coming forward as a key opportunity to deliver a replacement community facility alongside much needed homes, however, it is recommended that in order to meet the tests of soundness as set out in the NPPF, the proposed ‘deliverables’ and ‘opportunities’ should not be too prescriptive and that greater flexibility is allowed for in order to ensure the appropriate development in terms of scale and uses is delivered which is in turn fully supported by an up to date needs assessment. We support the overall direction of the draft Local Plan and would welcome the opportunity to continue our ongoing engagement and collaboration with the Council.		Comment noted.

Reg19-E-029	Idarish Patel		Reg19-E-029/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No					No	1. I believe it is not legally compliant as they are making a Walkway through a religious site. This will cause slot of disruption. 2. The purpose of the sight is to accommodate religious activity. Such as a large site for Eid prayers, housing and other purposes 3. A large site like this is also not available on newham. This is The only one. [Originally put against Policy Section 5 & 6]	2. Allowing the site to continue with religious activities	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-029	Idarish Patel		Reg19-E-029/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		1. By not putting a walkway thought the middle	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

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

Reg19-E-031	Ahmed Patel		Reg19-E-031/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Just like other faith places Muslim require big place for prayer so need big facility.yiy only put small mosque and walkway between existing mosque. I ask mosque they did not know about your plan.i want housing and big mosque fir 2 eid prayer and ramdhan. So I can enjoy This no other big place in newham for mosque use.i am not happy because it is community private land Government say built more houses so good facility mosque will good for this place and housing.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-032	Siraj Khankhara		Reg19-E-032/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													The size of the proposed replacement facility fails to meet the actual needs and demands of our Muslim community which means current inadequacies will remain, failing to meet the growing needs of our large congregation. Failure to address this concern will result in a significant loss in the community spirit as worshippers seek alternative locations for religious worship. This goes completely against Newham’s diversity which I feel so valued to be part of, and the Newham Council has therefore failed to succeed in incorporating diverse infrastructure in the upcoming draft proposal.	Our community members are very open to work together with landowners and relevant authorities to deliver a replacement facility which meets our community needs. I, alongside my community members, believe in collaboration and that consideration of our concerns will lead to a solution which benefits all stakeholders.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/096	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/097	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/098	Neighbours	N7 Three Mills	N7.SA2 Parcel for ce					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/099	Neighbours	N7 Three Mills	N7.SA2 Parcel for ce					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N7.SA2 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/100	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/101	Neighbourhoods	N7 Three Mills	N7.SA3 Sugar House Island					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/102	Neighbou rhoods	N7 Three Mills	N7.SA3 Sugar House Island					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N7.SA3 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.
Reg19-E-033	Thames Water		Reg19-E-033/103	Neighbou rhoods	N7 Three Mills	N7.SA3 Sugar House Island					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-036	Huzaifa Delawala		Reg19-E-036/002	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Impact on Community Spirit The inadequacies of the existing facility have led to a situation where many worshippers are compelled to seek alternative locations for their religious practices. This fragmentation is detrimental to the sense of community and unity that is crucial for a vibrant and supportive congregation. It is essential that any new facility not only addresses the spatial and functional deficiencies but also fosters a strong community spirit by providing a welcoming and inclusive environment for all members. Consideration of Diversity in Infrastructure Newham is a borough known for its rich diversity and multicultural population. However, the current draft proposal for new facilities appears to have overlooked the need for diverse infrastructure that reflects and supports this diversity. It is vital that the new facility incorporates elements that cater to the varied needs of our community, ensuring that all demographic groups feel represented and accommodated. In conclusion, I urge that the planning and development of any new facilities take into account the current inadequacies, the growing needs of our community, and the importance of fostering inclusivity and unity. A revised proposal that addresses these concerns and embraces the diversity of our borough will not only enhance the effectiveness of our services but also strengthen the community fabric.	In conclusion, we urge the authorities to consider these points carefully and incorporate them into the planning and development process. We are ready to engage in further discussions to ensure that the final proposal aligns with our community's needs and aspirations. Thank you for considering our feedback, and we look forward to working together to achieve a positive outcome for all parties involved.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-036	Huzaifa Delawala		Reg19-E-036/002a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		1. Collaboration with Landowners and Authorities Our community is eager to collaborate with landowners and relevant authorities to ensure that the replacement facility aligns with our collective needs. We firmly believe that a cooperative approach will lead to a solution that benefits all stakeholders involved. By working together, we can leverage the strengths and resources of each party to create a facility that is both functional and beneficial to the community. We are committed to engaging in productive discussions and providing support to facilitate this collaboration.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Reg19-E-036	Huzaifa Delawala		Reg19-E-036/002b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		2. Reassessment of Current Policy on Facility Size We would like to address the inflexibility of the current policy concerning the size of the facilities. The existing policy does not adequately accommodate the dynamic and evolving needs of our community. We strongly advocate for a comprehensive needs assessment to be conducted. Such an assessment would provide a clearer understanding of our community’s requirements and ensure that the facility's design and capacity are appropriate. A more flexible policy that considers these needs will result in a facility that is better suited to our community's growth and changes.	A change to this policy approach has not been made. The council undertook a Community Facilities Needs Assessment (2022) about the provision of the particular types of social infrastructure. It looked at 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. We did not consider a change in policy approach as necessary as the Local Plan is applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-036	Huzaifa Delawala		Reg19-E-036/002c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		3. Provision of Purpose-Built Facilities for Individuals with Disabilities Our community is also concerned about the lack of purpose-built facilities for individuals with disabilities. These facilities are crucial in helping the socially isolated elderly population engage with others and lead more connected lives. The current draft proposal does not fully utilize the land's potential to provide much-needed housing and larger community facilities. We have observed successful examples of such developments in other parts of London and across the country. It is essential that the proposal incorporates these considerations to maximize the benefits of the land and meet the diverse needs of our community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities of. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-036	Huzaifa Delawala		Reg19-E-036/002d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		4. Economic Growth and Employment Opportunities The site has the potential to contribute significantly to economic growth in the construction sector and create local employment opportunities. However, we are concerned that the proposed key route has not been addressed with the necessary diligence and care. Aligning this route with both housing and economic growth potential is crucial. A thoughtful and well-planned approach to infrastructure will enhance the effectiveness of the development and support broader economic benefits.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-039	Uzma Khankhara		Reg19-E-039/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Muslim organisation has already put plans to build a mosque and housing. The facilities will also be for women which	Our community members are very open to work together with landowners and relevant authorities to deliver a replacement facility which meets our community needs. I, alongside my community members, believe in collaboration and that consideration of our concerns will lead to a solution which benefits all stakeholders.	Comment noted. Please note an incomplete sentence was provided in the comment section of the form. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-040	Noormohamed Polli		Reg19-E-040/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantageing the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-040	Noormohamed Polli		Reg19-E-040/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-040	Noormohammed Polli		Reg19-E-040/001b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-040	Noormohammed Polli		Reg19-E-040/001c	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-041	Maimoona Siraj Khankhara		Reg19-E-041/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantageing the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-041	Maimoona Siraj Khankhara		Reg19-E-041/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-041	Maimoona Siraj Khankhara		Reg19-E-041/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-041	Maimoona Siraj Khankhara		Reg19-E-041/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-042	Mohammed Vali		Reg19-E-042/002	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	Westham is situated in proximity to the Three Mill as an existing place of worship in use within catchment to the Three Mills and Manor Road and Westham station as a community opportunity area. The whole wider, densely populated area is currently deficient in purpose-built mosques, but the local plan had allocated only small-scale faith use at Abbey Mill Site despite evidence-based needs. Major convergence is taking place in Newham with tall tower housing development buildings in the surrounding area currently under construction and future proposals of housing development needs throughout Newham. Convergence impact is inevitable; it will add additional pressure on the existing social infrastructure, which is already far reaching for the vast majority of community residents who do not have faith mosque facilities (social infrastructure) in the borough. There is already planning consent awarded to the Tall Tower housing construction underway, which is overlooking the Grade 2 listed pumping station adjoining Westham Station. As to Abbey Mill site grade 2, the listed pumping station is obscured from greenery—Westham station, Channel Sea building, and tall tower currently under construction, so it is not of the relevance to visual impact as evidence, but planning design mechanisms can be taken into consideration when site owners are given the opportunity. As to the opportunity area of Stratford tourist shopping attraction and housing convergence growth. Abbey Mill is strategically located to serve business employees of the catchment town centre of DLR Stratford Dockland to Custom House and Canning Town. With a growing Muslim community and a very good transport link. I myself and the community will be denied the opportunity to enjoy much-needed purpose-built large facilities at Abbey Mill Mosque as a future place of worship for spiritual well-being retreat for a healthier mental mind. Therefore, it is imperative that the draft local plan reflect this need of the vast majority of the Muslim population, as there are no alternative larger sites available in Newham to cater to the needs. Fridays and Eid Prayers are oversubscribed as people from far within Newham Borough regularly utilise places of existing faith in Eastham, Forest Gate, and Manor Park Area. Therefore, the draft proposal for Abbey Mill N7 SA1 should be reconsidered on the local plan land use for larger Faith Facilities, similar capacity in nature to Regents Park's existence at West London Borough. Owners are proposing for the land use at Abbey Mill with Larger Mosque with additional steps to accommodate with some housing for Newham East London too, and land use on planning should be allocated for Abbey Mill N7 SA1 local plan. Once it is developed due to the very good transport link and greenway cycle and walk route, it will be a focal point to the borough for diversity vision (admiration) not only for the Muslim community but for the tourists and visitors to the international city of London, which will	Comment noted. A thorough and robust approach has been taken to identify locations suitable for tall buildings, this is evidenced in the Tall Building Annex and ahs informed Policy D4. The development principles section of the site allocation directs the reader to Local Plan Policies S11, S12 and S13 for the delivery of social infrastructure. Policies S11 and S12 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. Policy S11 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. Local Plan Policy S12 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 S12 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy S12 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 S12. Policy S12 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 S12.1 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			add economic growth and employment for the borough and surrounding area. Westtham and Stratford City are already adapted to the international standard, and the Abbey Mill site will further enhance the diversity image nationally and internationally. Therefore, I object to the draft land use proposal on the local plan proposal, and it should be reconsidered to allow a once-in-a-lifetime opportunity to have this site allocated to a large social community infrastructure mosque with much-needed housing as well. [originally against Polcie Map Abby Mill N7 SA1 - taking forward as Policy N7 SA1]		
Reg19-E-042	Mohammed Vali		Reg19-E-042/004	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Additionally, it will devalue this land site and reward other cooperative land sites surrounding Abbey Mill at the expense of privately owned land if the key route is not contested. LA town centre planners failed to approach for the feasibility of this key route for an alternative negotiated approach with the owner, which I had enquired about as I hold interest in this site as a Newham resident. The community is currently using the site as a social infrastructure. [originally against Polcie Map Abby Mill N7 SA1 - taking forward as Policy N7 SA1]		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-042	Mohammed Vali		Reg19-E-042/004a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As to flooding risk assessment, it is for the Thames Water responsibility to put in place adequate flood defence mechanisms. There has never been an occurrence of flooding at this land site while ownership of privately owned land Modern scientific architecture is well equipped to deliver design models if deemed necessary. [originally against Polcie Map Abby Mill N7 SA1 - taking forward as Policy N7 SA1]		A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan's approach to mitigating flood risk is inline with national policy requirements. The site meets the criteria, set out in footnote 55 of the National Planning Policy Framework (2023), to provide a site specific flood risk assessment. This is the responsibility of the developer. The flood risk assessment will support the delivery of flood resistant development ensuring the safety of future users and occupiers of the site. Please note that Thames Water have no responsibility for flood defence mechanisms on the River Lea. The Environment Agency will be a statutory consultee who will advice on the suitability of the flood risk assessment. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-042	Mohammed Vali		Reg19-E-042/004b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham had already allocated purpose-built religious sites to other faith communities within the borough of Newham to enjoin. The mechanism of Citizen Assembly engagement approach for local plan development would not be independent as its citizens are made up of beneficiaries of Section 106 development; rather, a wider community and landowners would be appropriate channels of engagement in the formation of local plan design for this site. [originally against Polcie Map Abby Mill N7 SA1 - taking forward as Policy N7 SA1]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-047	Bilal Mir		Reg19-E-047/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Current Facility Limitations 1. Our existing facilities are not sufficient for meeting the everyday needs of our community. The outdated structure is too small to accommodate all members, particularly women and children, leading to overcrowded conditions. This lack of space limits participation and inclusivity, affecting our community's ability to come together effectively. 2. Importance of an Adequate Replacement Facility To overcome the current limitations, any new facility must be designed to meet the needs of our growing congregation. Simply replicating the size of the existing facility will not solve these problems. It is essential to conduct a thorough needs assessment to determine the appropriate size and features of the new facility to ensure it is functional and inclusive. 3. Impact on Community Cohesion The inadequacies of our current facility have driven many worshippers to seek alternative locations for their religious practices, which fragments our community and weakens our collective spirit. A new facility should provide sufficient space to enhance community unity and foster a stronger sense of belonging.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-047	Bilal Mir		Reg19-E-047/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	4. Reflecting Diversity in Design Newham is a diverse borough, and this diversity should be reflected in the infrastructure plans. The draft proposal needs to incorporate features that accommodate and celebrate our community's various cultural and religious practices. Designing adaptable and welcoming spaces is crucial to meeting the needs of our diverse population.		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the diverse population. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-047	Bilal Mir		Reg19-E-047/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		1. Collaboration with Landowners and Authorities Our community is enthusiastic about working closely with landowners and relevant authorities to develop a replacement facility that genuinely addresses our needs. We believe that a collaborative approach will enable us to find a solution that is advantageous for everyone involved. We propose the formation of a working group or regular consultations to ensure ongoing communication and incorporate diverse viewpoints throughout the development process.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-047	Bilal Mir		Reg19-E-047/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		3. Shortage of Purpose-Built Facilities for Individuals with Disabilities There is a significant gap in purpose-built facilities for individuals with disabilities, which are crucial for connecting socially isolated elderly individuals. The draft proposal does not fully utilize the land’s potential for much-needed housing and expanded community facilities, unlike similar developments observed in other areas of London and beyond. We urge a re-evaluation of the proposal to better integrate these essential elements. Additionally, we note that privately-owned land has been secured to address future community needs, and it is important that this opportunity is leveraged to enhance the development.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-048	Aamir Musa Salim		Reg19-E-048/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. • It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. • Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. • Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-048	Aamir Musa Salim		Reg19-E-048/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	
		Our community is keen to work with landowners and relevant authorities to create a new facility that meets our needs. We believe that by working together, we can find a solution that benefits everyone involved. In addition, we would like to address the inflexibility of the current policy regarding the size of facilities. Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.																	

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-048	Aamir Musa Salim		Reg19-E-048/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community. There is a lack of purpose-built facilities for individuals with disabilities, which would help the socially isolated elderly population connect with others.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-048	Aamir Musa Salim		Reg19-E-048/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The draft proposal does not fully utilize the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately owned land has been acquired to meet the future needs of the community.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.
Reg19-E-050	Sarah Naeem		Reg19-E-050/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills	Eviden ce				No	No						No	To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				community is eager to collaborate with landowners and authorities to develop a new facility that addresses our needs. We believe that a cooperative effort will yield a solution that benefits all stakeholders involved.	development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-050	Sarah Naeem		Reg19-E-050/001b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No		2. Need for a Comprehensive Needs Assessment: We strongly advocate for a thorough needs assessment to be conducted. The current policy does not adequately reflect the evolving requirements of our community, particularly regarding the size and functionality of facilities. An updated assessment would ensure that future developments align with actual community needs. [Refer to CFNA assessment]	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-050	Sarah Naeem		Reg19-E-050/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills	Eviden ce				No	No						No		3. Inclusion of Purpose-Built Facilities: The current facilities lack accommodations for individuals with disabilities, which hampers their ability to participate fully. Incorporating purpose-built facilities for disabled individuals would support our socially isolated elderly population and enhance community connectivity.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-050	Sarah Naeem		Reg19-E-050/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills	Eviden ce				No	No						No		4. Optimizing Land Use: The draft proposal does not fully leverage the land’s potential for integrating much-needed housing alongside larger community facilities. Other parts of London and similar regions have successfully combined housing and community facilities, and we urge for a similar approach in this proposal. A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.
Reg19-E-050	Sarah Naeem		Reg19-E-050/001e	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills	Eviden ce				No	No						No		5. Future Needs and Land Use: Privately owned land has been secured to address future community needs. It is crucial that the development plan incorporates these considerations to maximize the land’s potential and provide for the growing demands of our community. A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				In summary, by advocating for a detailed needs assessment, improved policy flexibility, and optimized land use, we aim to create a facility that truly meets our community's needs and supports its diverse members effectively. We look forward to working together to achieve these goals and enhance our community's well-being.	used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Reg19-E-051	Nafisa Musa		Reg19-E-051/001a	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No					No	To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points: Current Facility Limitations: The existing facilities are inadequate for accommodating the diverse and growing needs of our community. The space constraints particularly affect the participation of women and children, limiting inclusivity and engagement.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

LB Newham Response		The Council is satisfied that the plan remains sound without the proposed changes.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001b	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	[To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:] Need for Expansion: A replacement facility must be larger than the current one to address these deficiencies effectively. Simply replicating the size of the existing facility will not resolve the issues but rather perpetuate the current limitations.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001c	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	[To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:] Impact on Community Engagement: The inadequacies of the current facility have led many worshippers to seek alternative locations for their religious practices, which disrupts community cohesion and engagement. A new facility should aim to foster a stronger community spirit by providing adequate space for all members.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001d	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	[To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:] Diversity and Infrastructure: Newham is known for its diverse population, yet this diversity has not been reflected in the draft proposal for the new facility. It is crucial that the new facility incorporate infrastructure that reflects and supports this diversity, ensuring that all community members feel valued and included.		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001e	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	[To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:] In summary, the proposed facility must be designed with a focus on expanding capacity and inclusivity to meet the needs of our community effectively. Addressing these concerns will not only enhance community engagement but also reflect Newham’s commitment to diversity and inclusion.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-051	Nafisa Musa		Reg19-E-051/001f	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No					No	[To address the concerns regarding the current facilities and ensure that the new facility meets the needs of our community, it is important to highlight several key points:] The need for a dedicated women’s prayer area in the new facility is a crucial aspect that cannot be overlooked. Here are several key reasons why such a space is essential: 1. Inclusivity and Equal Access: A designated women’s prayer area ensures that women have equal access to worship facilities. In many religious traditions, including our own, having a separate prayer area for women is not just a matter of convenience but also of respect for religious practices and customs. 2. Enhanced Participation: By providing a dedicated space for women, the new facility will encourage greater participation from women in religious activities. This helps to create a more inclusive environment where all members of the community feel valued and able to fully engage in spiritual practices. 3. Privacy and Comfort: Women’s prayer areas offer privacy and comfort, allowing women to pray and participate in religious activities in an environment that respects their needs and preferences. This is particularly important for women who may have cultural or personal preferences for privacy during worship. 4. Family and Community Integration: A separate women’s prayer area can also support family integration. For example, parents with young children can feel more comfortable attending services if there is a designated space for women and children. This can help to foster a stronger sense of community and family involvement in religious activities. 5. Addressing Space Constraints: The current facility’s limitations in accommodating women’s needs underscore the importance of having a dedicated women’s prayer area. Without such a space, the facility cannot fully address the diverse needs of its worshippers, leading to overcrowding and discomfort. 6. Promoting Gender Equality: Establishing a women’s prayer area reflects a commitment to gender equality within the community. It shows that the facility values and supports the participation of all members, regardless of gender, in religious practices. 7. Supporting Special Needs: Women’s prayer areas can be designed to accommodate special needs, such as accessibility for those with disabilities or provisions for women who may need to care for young children during services. This inclusivity is essential for fostering a supportive and accommodating worship environment. In summary, a dedicated women’s prayer area is not just a physical space but a reflection of the community’s values and commitment to inclusivity, respect, and equal access for all its members. By incorporating such an area into the new facility, we can better serve the needs of our community and ensure that everyone	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			has the opportunity to participate fully in religious life.		
Reg19-E-051	Nafisa Musa		Reg19-E-051/001g	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	1. Collaborative Approach: o Community Engagement: Our community is eager to work closely with landowners and authorities to develop a new facility that meets our needs. We believe that a collaborative approach will lead to a solution that benefits all parties involved, ensuring that the facility serves its intended purpose effectively.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-051	Nafisa Musa		Reg19-E-051/001h	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	2. Need for a Comprehensive Needs Assessment: o Current Limitations: The existing policy does not fully reflect the evolving requirements of our community, especially concerning the size and functionality of facilities. We advocate for a comprehensive needs assessment to accurately determine the requirements of our growing and diverse community. o Future-Proofing: An updated assessment will help future-proof the development, ensuring that it meets not just current but also anticipated needs. [Refer to CFNA assessment]		A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001i	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	3. Inclusion of Purpose-Built Facilities: - o Accessibility: The current facilities lack accommodations for individuals with disabilities, which limits their participation. Incorporating purpose-built facilities for disabled individuals is essential for inclusivity. - o Support for Elderly Population: Purpose-built spaces will also benefit our socially isolated elderly population, providing them with opportunities to connect and engage with the community.		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities and the elderly. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001j	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	4. Optimizing Land Use: o Integrated Development: The draft proposal should better utilize the land’s potential by integrating much-needed housing with larger community facilities. Successful models in other parts of London and the UK demonstrate that combining housing and community spaces can address both housing needs and provide enhanced community amenities. o Efficient Land Use: We urge for a plan that maximizes land use to benefit the community comprehensively, avoiding underutilization of valuable space.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001k	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	5. Future Needs and Land Use: o Secured Land: Privately owned land has already been acquired to address future community needs. It is crucial that these considerations are incorporated into the development plan to ensure that the facility is well-positioned to meet the community's growing demands. o Long-Term Planning: Effective land use planning will help accommodate both current and future needs, ensuring that the facility remains relevant and useful for years to come.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-051	Nafisa Musa		Reg19-E-051/001I	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills	Evidence				No	No						No	Conclusion By advocating for a detailed needs assessment, improved policy flexibility, and optimized land use, we aim to create a facility that genuinely meets the needs of our community. These steps will support our diverse members effectively and enhance overall community well-being. We look forward to a collaborative effort to achieve these goals and foster a facility that serves all members of our community with respect and inclusivity.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-052	Hanna Musa		Reg19-E-052/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	The need for a dedicated women’s prayer area in the new facility is a crucial aspect that cannot be overlooked. Here are several key reasons why such a space is essential: 1. Inclusivity and Equal Access: A designated women’s prayer area ensures that women have equal access to worship facilities. In many religious traditions, including our own, having a separate prayer area for women is not just a matter of convenience but also of respect for religious practices and customs. 2. Enhanced Participation: By providing a dedicated space for women, the new facility will encourage greater participation from women in religious activities. This helps to create a more inclusive environment where all members of the community feel valued and able to fully engage in spiritual practices. 3. Privacy and Comfort: Women’s prayer areas offer privacy and comfort, allowing women to pray and participate in religious activities in an environment that respects their needs and preferences. This is particularly important for women who may have cultural or personal preferences for privacy during worship. 4. Family and Community Integration: A separate women’s prayer area can also support family integration. For example, parents with young children can feel more comfortable attending services if there is a designated space for women and children. This can help to foster a stronger sense of community and family involvement in religious activities. 5. Addressing Space Constraints: The current facility’s limitations in accommodating women’s needs underscore the importance of having a dedicated women’s prayer area. Without such a space, the facility cannot fully address the diverse needs of its worshippers, leading to overcrowding and discomfort. 6. Promoting Gender Equality: Establishing a women’s prayer area reflects a commitment to gender equality within the community. It shows that the facility values and supports the participation of all members, regardless of gender, in religious practices. 7. Supporting Special Needs: Women’s prayer areas can be designed to accommodate special needs, such as accessibility for those with disabilities or provisions for women who may need to care for young children during services. This inclusivity is essential for fostering a supportive and accommodating worship environment. In summary, a dedicated women’s prayer area is not just a physical space but a reflection of the community’s values and commitment to inclusivity, respect, and equal access for all its members. By incorporating such an area into the new facility, we can better serve the needs of our community and ensure that everyone has the opportunity to participate fully in religious life.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-052	Hanna Musa		Reg19-E-052/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		1. Collaborative Approach: o Community Engagement: Our community is eager to work closely with landowners and authorities to develop a new facility that meets our needs. We believe that a collaborative approach will lead to a solution that benefits all parties involved, ensuring that the facility serves its intended purpose effectively.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-052	Hanna Musa		Reg19-E-052/001b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		2. Need for a Comprehensive Needs Assessment: o Current Limitations: The existing policy does not fully reflect the evolving requirements of our community, especially concerning the size and functionality of facilities. We advocate for a comprehensive needs assessment to accurately determine the requirements of our growing and diverse community. o Future-Proofing: An updated assessment will help future-proof the development, ensuring that it meets not just current but also anticipated needs. [Refer to CFNA]	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-052	Hanna Musa		Reg19-E-052/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		3. Inclusion of Purpose-Built Facilities: - o Accessibility: The current facilities lack accommodations for individuals with disabilities, which limits their participation. Incorporating purpose-built facilities for disabled individuals is essential for inclusivity. - o Support for Elderly Population: Purpose-built spaces will also benefit our socially isolated elderly population, providing them with opportunities to connect and engage with the community.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities and those that are elderly. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-052	Hanna Musa		Reg19-E-052/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		4. Optimizing Land Use: - o Integrated Development: The draft proposal should better utilize the land’s potential by integrating much-needed housing with larger community facilities. Successful models in other parts of London and the UK demonstrate that combining housing and community spaces can address both housing needs and provide enhanced community amenities. - o Efficient Land Use: We urge for a plan that maximizes land use to benefit the community comprehensively, avoiding underutilization of valuable space.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-052	Hanna Musa		Reg19-E-052/001e	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		5. Future Needs and Land Use: - o Secured Land: Privately owned land has already been acquired to address future community needs. It is crucial that these considerations are incorporated into the development plan to ensure that the facility is well-positioned to meet the community’s growing demands. - o Long-Term Planning: Effective land use planning will help accommodate both current and future needs, ensuring that the facility remains relevant and useful for years to come.	Comment noted. Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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.
Reg19-E-052	Hanna Musa		Reg19-E-052/001f	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Conclusion By advocating for a detailed needs assessment, improved policy flexibility, and optimized land use, we aim to create a facility that genuinely meets the needs of our community. These steps will support our diverse members effectively and enhance overall community well-being. We look forward to a collaborative effort to achieve these goals and foster a facility that serves all members of our community with respect and inclusivity.	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-053	Mohmed Jeeva		Reg19-E-053/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantageing the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-053	Mohmed Jeeva		Reg19-E-053/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-053	Mohmed Jeeva		Reg19-E-053/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-053	Mohmed Jeeva		Reg19-E-053/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Reg19-E-054	Mohsin Ikbal		Reg19-E-054/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		</

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-054	Mohsin Ikbal		Reg19-E-054/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-054	Mohsin Ikbal		Reg19-E-054/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-054	Mohsin Ikbal		Reg19-E-054/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-055	Mehboob Toliya		Reg19-E-055/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantageing the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-055	Mehboob Toliya		Reg19-E-055/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-055	Mehboob Toliya		Reg19-E-055/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-055	Mehboob Toliya		Reg19-E-055/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-056	Atik Vahora		Reg19-E-056/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantageing the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-056	Atik Vahora		Reg19-E-056/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-056	Atik Vahora		Reg19-E-056/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-056	Atik Vahora		Reg19-E-056/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-057	Seemaben Vahora		Reg19-E-057/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-057	Seemaben Vahora		Reg19-E-057/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-057	Seemaben Vahora		Reg19-E-057/001b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment
Reg19-E-057	Seemaben Vahora		Reg19-E-057/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							
Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector. A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.																			

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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-058	Samiullah Moosa		Reg19-E-058/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-058	Samiullah Moosa		Reg19-E-058/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-058	Samiullah Moosa		Reg19-E-058/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-064	Ahmed Said Vahora		Reg19-E-064/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													I am not in favour of markaz plan. It is affecting the community.	New ham council needs to connect with community before making any deficiency.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-066	Frazal Patel		Reg19-E-066/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							I Am not agree with the New Ham Council Proposal. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	This Plan is impacting certain community. They needs to talk to the land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-067	Shiraj Bhad		Reg19-E-067/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							The Main Authorities and New Ham Council , have been on crusaed against this Muslim property over 25 years. Torturing them and begin difficult at any way they can. Now they want to still their land. This is pure evil. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	This Plan is impacting certain community. They needs to talk to the land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-068	Faizan Khan		Reg19-E-068/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							I am not agree with the Markaz Proposal By New Ham Council. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	New Ham Council Have to take a meeting with Land Owner and community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-069	Sabir Patel		Reg19-E-069/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							The Local Plan is not legally compliant because this land is purchased to build a mosque to equate large number of worshipers use for local and national [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	To make the Local Plan legally compliant. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-070	Ishaq Vali Patel		Reg19-E-070/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							I Am not agree with the New Ham Council Proposal. Their plan is autocratic. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	This Plan is impacting certain community. They needs to talk to the land owner. It is not suitable for such a big council that they have not consulted the concern person before taking proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-071	Nazir Patel		Reg19-E-071/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							This New Ham Council Proposal is discrimination towards a particular Community. This Plan is totally wrong. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	New Ham Council has to discuss with the Land Owner and impacted community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-072	Mahmmad Munshi		Reg19-E-072/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							This New Ham Council Plan is a harsh decision which impacting a certain community. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	New Ham Council has to discuss with the Land Owner and impacted community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-073	Ghulam Seth		Reg19-E-073/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• The current facilities are insufficient and fail to meet our community's daily needs. The limitations of the existing structure impede our ability to effectively serve our members. The current space is too small to accommodate all worshippers, especially women and children. This lack of space limits participation and inclusivity within our community. • It is crucial that any new facility be sized according to the actual needs and demands of our community. Maintaining the same size as the existing facility would not resolve the current deficiencies and would not meet the growing needs of our congregation. • Due to the inadequacies of the current facility, many worshippers are forced to seek alternative locations for their religious practices. This situation hinders the development of a strong community spirit. • Newham is a diverse borough, yet the upcoming draft proposal has not succeeded in integrating diverse infrastructure.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-073	Ghulam Seth		Reg19-E-073/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• Our community is keen to work with landowners and relevant authorities to develop a replacement facility that addresses our needs. We believe that collaboration can lead to a solution that benefits everyone involved.	Comment noted.
Reg19-E-073	Ghulam Seth		Reg19-E-073/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• We would also like to address the rigidity of the current policy concerning facility size. We strongly recommend conducting a needs assessment, as the existing policy does not adequately reflect our community's evolving requirements. [Refer to CFNA]	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-073	Ghulam Seth		Reg19-E-073/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• There is a lack of facilities designed specifically for individuals with disabilities, which would help socially isolated elderly individuals connect with others. The draft proposal does not fully leverage the land's potential for essential housing and larger community facilities, as seen in other areas of London and beyond. Privately-owned land has been acquired to address the future needs of the community.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-073	Ghulam Seth		Reg19-E-073/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• The site will contribute to economic growth in the construction sector and provide local job opportunities. However, the proposed key route has not been thoroughly considered to align with housing and economic growth potential.[...] • Object everything on private land use policy including key route which will hinder future community development.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-073	Ghulam Seth		Reg19-E-073/001e	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• Work with the land owner and change local plan for purpose-built Mosque and much needed Housing. [...] • Work with land owner for solution who are working fir community interest	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-074	Ashraful Essan		Reg19-E-074/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	There is no female facility in Newham, other boroughs in the surrounding areas have a purpose built mosque why is it a problem for Newham	Allocate the land for use for the community mosque and housing	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The Local Plan is applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-075	Yunus Kuwaiti		Reg19-E-075/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• The current facilities are insufficient and do not meet our community’s daily needs. The limitations of the existing structure hinder our ability to serve our members effectively. The space is too small to accommodate all worshippers, especially women and children, which limits participation and inclusivity within our community. • Any new facility must be appropriately sized to address the actual needs and demands of our community. Maintaining the same size as the current facility will not resolve existing shortcomings or accommodate the growing needs of our congregation. • The inadequacies of the current facility compel many worshippers to seek alternative locations for their religious practices. This situation undermines the development of a strong community spirit and affects the flow of people through our centers and mosques. • Despite Newham's diversity, the upcoming draft proposal does not adequately address the need for diverse infrastructure. • A new facility must be larger and better suited to accommodate a growing congregation. We strongly recommend conducting a needs assessment, as the existing policy falls short of meeting our requirements.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-075	Yunus Kuwaiti		Reg19-E-075/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Our community is eager to collaborate with landowners and relevant authorities to develop a new facility that meets our needs. We believe that working together can yield a mutually beneficial outcome.[...] Our community is enthusiastic about working with landowners and relevant authorities to develop a new facility that meets both our needs and those of the broader community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-075	Yunus Kuwaiti		Reg19-E-075/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		We want to emphasize the limitations of the current policy concerning facility size. We strongly advocate for a needs assessment, as the existing policy does not adequately reflect our community's evolving requirements.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-075	Yunus Kuwaiti		Reg19-E-075/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• There is a shortage of facilities specifically designed for individuals with disabilities, which would help socially isolated elderly individuals connect with others. The draft proposal does not fully leverage the land’s potential for essential housing and expanded community facilities, as seen in other areas of London and beyond. Additionally, privately-owned land has been acquired to meet future community needs.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-075	Yunus Kuwaiti		Reg19-E-075/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• The proposed site offers significant potential for driving economic growth in the construction sector and creating local job opportunities. However, the proposed key route has not been thoroughly assessed for its alignment with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-076	Mohammed musab		Reg19-E-076/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-076	Mohammed musab		Reg19-E-076/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-076	Mohammed musab		Reg19-E-076/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-076	Mohammed musab		Reg19-E-076/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-077	Nayeem Gani		Reg19-E-077/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							This Plan is impacting certain community. They needs to talk to the land owner.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-078	Shoaib Ismail		Reg19-E-078/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-078	Shoaib Ismail		Reg19-E-078/02a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community's daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-078	Shoaib Ismail		Reg19-E-078/04	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council's stated goal of fostering community cohesion.		Comment noted.
Reg19-E-078	Shoaib Ismail		Reg19-E-078/05	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-079	Yusuf Vali		Reg19-E-079/01a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• Our community is keen to work with landowners and relevant authorities to develop a replacement facility that addresses our needs. We believe that collaboration can lead to a solution that benefits everyone involved. [...] • Our community is keen and enthusiastic to collaborate with the landowners and relevant authorities to deliver a replacement facility that not only caters for our needs, but the wider community. • Work with the land owner and change local plan for purpose-built Mosque and much needed Housing. [...] • Work with land owner for solution who are working fir community interest	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-079	Yusuf Vali		Reg19-E-079/01b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• We would also like to address the rigidity of the current policy concerning facility size. We strongly recommend conducting a needs assessment, as the existing policy does not adequately reflect our community's evolving requirements.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-079	Yusuf Vali		Reg19-E-079/01c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• There is a lack of facilities designed specifically for individuals with disabilities, which would help socially isolated elderly individuals connect with others. The draft proposal does not fully leverage the land's potential for essential housing and larger community facilities, as seen in other areas of London and beyond. Privately-owned land has been acquired to address the future needs of the community.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-079	Yusuf Vali		Reg19-E-079/01d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• The site will contribute to economic growth in the construction sector and provide local job opportunities. However, the proposed key route has not been thoroughly considered to align with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-079	Yusuf Vali		Reg19-E-079/01f	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		• Object everything on private land use policy including key route which will hinder future community development.	Comment noted. 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.
Reg19-E-080	Salim Musa		Reg19-E-080/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Policy failing on duty to co operate	Engage with community faith leaders	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-085	Omarji Ahmed		Reg19-E-085/04	Social Infrastructure	N7 Three Mills	N7.SA1 Abbey Mills					No	No							3. Encouraging Fragmentation of Worshippers Due to the limitations of the existing facilities, many worshippers are forced to seek alternative locations to practice their religion. This situation weakens the sense of community and belonging that is essential for social cohesion. By not planning for an appropriately sized facility, the Local Plan fails to create an environment where the community can thrive together in a central, inclusive space. [originally against SI1, SI2 and SI3 - taking forward N7 SA1 Abbey Mills]		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/02	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Major convergence is taking place in Newham with tall tower housing development buildings in the surrounding area currently under construction and future proposals of housing development needs throughout Newham. Convergence impact is inevitable; it will add additional pressure on the existing social infrastructure, which is already far reaching for the vast majority of community residents who do not have faith mosque facilities (social infrastructure) in the borough.		Comment noted. A thorough and robust approach has been taken to identify locations suitable for tall buildings, this is evidenced in the Tall Building Annex and ahs informed Policy D4. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	There is already planning consent awarded to the Tall Tower housing construction underway, which is overlooking the Grade 2 listed pumping station adjoining Westham Station. As to Abbey Mill site grade 2, the listed pumping station is obscured from greenery—Westham station, Channel Sea building, and tall tower currently under construction, so it is not of the relevance to visual impact as evidence, but planning design mechanisms can be taken into consideration when site owners are given the opportunity. As to the opportunity area of Stratford tourist shopping attraction and housing convergence growth. Abbey Mill is strategically located to serve business employees of the catchment town centre of DLR Stratford Dockland to Custom House and Canning Town. With a growing Muslim community and a very good transport link. I myself and the community will be denied the opportunity to enjoy much-needed purpose-built large facilities at Abbey Mill Mosque as a future place of worship for spiritual well-being retreat for a healthier mental mind.		Comment noted. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/03a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Therefore, it is imperative that the draft local plan reflect this need of the vast majority of the Muslim population, as there are no alternative larger sites available in Newham to cater to the needs. Fridays and Eid Prayers are oversubscribed as people from far within Newham Borough regularly utilise places of existing faith in Eastham, Forest Gate, and Manor Park Area. Therefore, the draft proposal for Abbey Mill N7 SA1 should be reconsidered on the local plan land use for larger Faith Facilities, similar capacity in nature to Regents Park's existence at West London Borough. Owners are proposing for the land use at Abbey Mill with Larger Mosque with additional steps to accommodate with some housing for Newham East London too, and land use on planning should be allocated for Abbey Mill N7 SA1 local plan.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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.
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/03b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Once it is developed due to the very good transport link and greenway cycle and walk route, it will be a focal point to the borough for diversity vision (admiration) not only for the Muslim community but for the tourists and visitors to the international city of London, which will add economic growth and employment for the borough and surrounding area. Westham and Stratford City are already adapted to the international standard, and the Abbey Mill site will further enhance the diversity image nationally and internationally. Therefore, I object to the draft land use proposal on the local plan proposal, and it should be reconsidered to allow a once-in-a-lifetime opportunity to have this site allocated to a large social community infrastructure mosque with much-needed housing as well.		Comment noted.
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/05	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	In addition, the local plan had outlined Key Route through to the prime land location, and I strongly object as this proposal is impacting the future use of this privately owned land facility for the use by the community. Additionally, it will devalue this land site and reward other cooperative land sites surrounding Abbey Mill at the expense of privately owned land if the key route is not contested. LA town centre planners failed to approach for the feasibility of this key route for an alternative negotiated approach with the owner, which I had enquired about as I hold interest in this site as a Newham resident.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/06	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The community is currently using the site as a social infrastructure. As to flooding risk assessment, it is for the Thames Water responsibility to put in place adequate flood defence mechanisms. There has never been an occurrence of flooding at this land site while ownership of privately owned land Modern scientific architecture is well equipped to deliver design models if deemed necessary.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan's approach to mitigating flood risk is inline with national policy requirements. The site meets the criteria, set out in footnote 55 of the National Planning Policy Framework (2023), to provide a site specific flood risk assessment. This is the responsibility of the developer. The flood risk assessment will support the delivery of flood resistant development ensuring the safety of future users and occupiers of the site. Please note that Thames Water have no responsibility for flood defence mechanisms on the River Lea. The Environment Agency will be a statutory consultee who will advice on the suitability of the flood risk assessment. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/06a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham had already allocated purpose-built religious sites to other faith communities within the borough of Newham to enjoin.		Comment noted.
Reg19-E-087	Talhah Khapee		Reg19-E-087/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The Local Plan is neither legally compliant nor sound for several key reasons: Our community is eager to collaborate with landowners and relevant authorities to develop a new facility that meets our needs. We believe that working together will result in a solution that benefits all parties involved.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-087	Talhah Khapee		Reg19-E-087/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No						No	Insufficient Facilities: The current plan does not address the inadequate facilities that are vital to our community’s daily activities. The existing structure is too small, particularly restricting access for women and children. This lack of space limits participation and undermines the inclusivity that is essential in a diverse borough like Newham. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.
Reg19-E-087	Talhah Khapee		Reg19-E-087/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Failure to Meet Community Needs: The plan’s proposal to maintain the facility at its current size ignores the clear and growing demand within our congregation. Any replacement facility must be designed to meet the real needs of the community. Without expanding its capacity, the plan will only continue the existing shortcomings, putting our community at a disadvantage.	To make the Local Plan legally compliant and robust, the following key adjustments are essential: Comprehensive Needs Assessment: A detailed needs assessment for the proposed facility must be incorporated into the Local Plan. This should address current and projected demographic trends, the expanding community, and the particular needs of women, children, and individuals with disabilities. Without this critical evaluation, the plan will fail to align with	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			[originally against SI1, SI2 and SI3 - taking forward N7.SA1]	the community’s actual needs. ...By adopting these revisions, the Local Plan will achieve legal compliance and soundness, ensuring it addresses community needs while promoting long-term growth and sustainability within the borough.	Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-087	Talhah Khapee		Reg19-E-087/04	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No						No	Dispersal and Fragmentation: Due to the limitations of the current facility, worshippers have been forced to find alternative locations, leading to a fragmented community. This weakens the collective spirit and goes against the council’s goal of promoting community cohesion. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-087	Talhah Khapee		Reg19-E-087/04a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No						No		Maximising Land for Economic and Housing Development: The current draft does not fully capitalise on the land’s potential for economic growth or housing. We propose integrating larger community facilities with housing developments, a model successfully implemented in other parts of London. This would not only meet community needs but also stimulate local economic growth and create construction jobs.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-087	Talhah Khapee		Reg19-E-087/04b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No						No		Re-evaluating the Proposed Key Route: The alignment of the proposed key route should be reviewed, with greater consideration of its effects on housing potential and economic development. A more thoughtful approach is required to ensure the route supports the borough's overall development goals. ...By adopting these revisions, the Local Plan will achieve legal compliance and soundness, ensuring it addresses community needs while promoting long-term growth and sustainability within the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-087	Talhah Khapee		Reg19-E-087/05	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No						No	Lack of Inclusive Infrastructure: Although Newham prides itself on diversity, the draft plan lacks the necessary infrastructure to support its diverse population. It fails to provide inclusive facilities that address the needs of underrepresented groups, including the elderly, women, children, and individuals with disabilities. [originally against SI1, SI2 and SI3 - taking forward SI2]		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the elderly, women, children and individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-088	Yusuf Mahmood		Reg19-E-088/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I can reach abbey mill in 10mins. I will be impacted by disability act denied ease of access	Good site for community use	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																						
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham and does not help the local community. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.	
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive,	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made	

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports. Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic tr	Please note that the comment provided included an incomplete sentence. A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-090	Huzaifa Khankhara		Reg19-E-090/04	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-094	Abrar Vaohra		Reg19-E-094/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							This New Ham Council Plan is not appropriate. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	New Ham Council has to consolidate the issues from the concern people then they have to make any proposal	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-097	Latif Patel		Reg19-E-097/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	The existing resources do not adequately meet the daily needs of our community, especially for women and children, thereby limiting participation and inclusivity. The proposal from the landowner presents a feasible solution by offering sufficient space for all community members.	To enhance the legal compliance and soundness of the Local Plan, it is essential to modify it to prioritize the actual needs of our diverse community, particularly regarding the provision of adequate worship facilities. The current inadequacies of our existing facilities, which hinder participation, inclusivity, and effective service delivery, demonstrate a clear disconnect between the Plan's proposals and community requirements. By increasing the size of the proposed replacement facility, we can ensure that it accommodates all members of our congregation, particularly women and children, who are currently underserved. Such a modification would not only align with the principles of community inclusivity, a fundamental tenet of sustainable development, but it would also adhere to legal obligations under the Equality Act, promoting equality of opportunity for all community members. Furthermore, addressing the current inadequacies would help to nurture a more robust community spirit, directly contributing to the social cohesion and diversity that Newham prides itself on. Failure to consider these modifications risks perpetuating existing disparities and undermines the legal compliance and soundness of the Local Plan, making it essential that these changes are implemented.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

LB Newham Response		The Council is satisfied that the plan remains sound without the proposed changes.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-097	Latif Patel		Reg19-E-097/03	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	However, the Key Route proposal within the Local Plan threatens to restrict the Mosque's size, worsening existing issues and hindering our ability to serve our congregation effectively. Maintaining the same size as the current facility would disregard the growth and needs of our worshippers, compelling many to look for alternative venues for their religious practices, which would undermine community cohesion.	A change to this policy approach has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-098	Nafees Khojji		Reg19-E-098/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-098	Nafees Khojji		Reg19-E-098/01a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-098	Nafees Khojji		Reg19-E-098/01b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-098	Nafees Khojji		Reg19-E-098/01c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-099	Abeda Patel		Reg19-E-099/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I oppose the Local Plan proposal because it does not adequately address the concerns of the community, such as the lack of facilities for religious prayer and housing options. This affects me as a user of the existing facility who has noticed the inadequacies, and I am appalled by the lack of consideration of the wellbeing of the wider community in terms of community cohesion obtained by adequate religious facilities and who is concerned about the ongoing housing crisis.	To align with the community's aspirations and address its concerns, please hold discussions with the Landowner, who has thoughtfully considered the wellbeing of the broader community by developing retail shops and housing, alongside a sufficiently large Mosque that accommodates both male and female use.	Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-102	Network Rail		Reg19-E-102/012	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Blank	Blan k						Blank		[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.] [Appendix 1: Network Rail’s feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Proposed Wording (Additional text) The layout of the site should ensure that a small area of land, running parallel to the existing railway (east to west), is retained to allow redevelopment of West Ham Station, including capacity, interchange and accessibility improvements to be delivered in the future. Network Rail Rationale Due to the space constraints at West Ham Station and on the surrounding land, further wording should be added to ensure that the potential future options for increased capacity, interchange and accessibility improvements at the station can be delivered.	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. However, the Council recognises the importance of ensuring that the Plan is effective, and has therefore drafted the following modification to policy which will be presented to the Inspector for their consideration: Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations. 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.

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

Reg19-E-102	Network Rail		Reg19-E-102/013	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					Blank	Blan k						Blank		[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.] [Appendix 1: Network Rail’s feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Current Regulation 19 Wording Development should provide an improved bridge connection to West Ham Station. Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations Proposed Wording Development should provide an improved bridge connection to West Ham Station. Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations. A small area of land to the north west of West Ham station should be reserved to enable additional station capacity to be provided in the future. Network Rail Rationale NR welcome the commitment within the allocation for the development to provide an improved bridge connection to West Ham Station and contribute to active and public transport upgrades. The applicant will need to engage with TFL and NR early in the development process to discuss the proposed bridge connection to West Ham Station. Due to the space constraints at West Ham Station and on the surrounding land, further wording should be added to ensure that the potential future options for increased capacity, interchange and accessibility improvements at the station can be delivered.	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. However, the Council recognises the importance of ensuring that the Plan is effective, and has therefore drafted the following modification to policy which will be presented to the Inspector for their consideration: Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations. 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.
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an

Neighbourhoods Comments to the full Regulation 19 Representations																					
																			undermines the inclusivity essential for a diverse borough like Newham. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough.	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.
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied the plan is sound without the proposed changes.

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

Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		We propose that the plan Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without integrating larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. 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, children and individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-110	Yunusbhai Patel		Reg19-E-110/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No							No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. [originally against SI1, SI2 and	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning

LB Newham Response																	application process. The Council is satisfied that the plan is sound without the proposed changes.
Proposed modifications and explanation																	SI3, N7.SA1 Policies Map - taking forward N7.SA1]
Representor Comment																	
Complies with Duty to Cooperate?																	
Consistent with the London Plan?																	
Consistent with the NPPF?																	
Effective?																	
Justified?																	
Positively prepared?																	
Sound?																	
Legally Compliant?																	
Implementation text																	
Justification																	
Clause																	
Introduction																	
Site allocation																	
Policy																	
Chapter																	
Comment Reference																	
Agent																	
Representor																	
Representation Reference																	

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-116	Yakub Makardam		Reg19-E-116/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	• The current facilities are insufficient and do not meet our community’s daily needs. The limitations of the existing structure hinder our ability to serve our members effectively. The space is too small to accommodate all worshippers, especially women and children, which limits participation and inclusivity within our community. • Any new facility must be appropriately sized to address the actual needs and demands of our community. Maintaining the same size as the current facility will not resolve existing shortcomings or accommodate the growing needs of our congregation. • The inadequacies of the current facility compel many worshippers to seek alternative locations for their religious practices. This situation undermines the development of a strong community spirit and affects the flow of people through our centers and mosques. • Despite Newham's diversity, the upcoming draft proposal does not adequately address the need for diverse infrastructure. • A new facility must be larger and better suited to accommodate a growing congregation. We strongly recommend conducting a needs assessment, as the existing policy falls short of meeting our requirements. • Work with the land owner and change local plan for purpose built Mosque and much needed Housing. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	• There is a shortage of facilities specifically designed for individuals with disabilities, which would help socially isolated elderly individuals connect with others. The draft proposal does not fully leverage the land’s potential for essential housing and expanded community facilities, as seen in other areas of London and beyond. Additionally, privately-owned land has been acquired to meet future community needs.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-116	Yakub Makardam		Reg19-E-116/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• Object everything on private land use policy including key route which will hinder future community development. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	• The proposed site offers significant potential for driving economic growth in the construction sector and creating local job opportunities. However, the proposed key route has not been thoroughly assessed for its alignment with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-116	Yakub Makardam		Reg19-E-116/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• Work with land owner for solution who are working fir community interest [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	Our community is eager to collaborate with landowners and relevant authorities to develop a new facility that meets our needs. We believe that working together can yield a mutually beneficial outcome. • Our community is enthusiastic about working with landowners and relevant authorities to develop a new facility that meets both our needs and those of the broader community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-117	Sajid Bhai Vahora		Reg19-E-117/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council's stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-117	Sajid Bhai Vahora		Reg19-E-117/03a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. Clause 7 of Policy S12 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women, children and disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-117	Sajid Bhai Vahora		Reg19-E-117/03b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-119	MD Shaiful Azam		Reg19-E-119/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community's daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council's stated goal of fostering community cohesion. Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community. Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities. Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land's potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community's needs but also contribute to local economic growth and job creation in the construction sector. Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough. Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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, children and individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 key route shown in the map is a design

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-120	Mahmmed Salman Vohra		Reg19-E-120/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council did a proposal which is irrelevant and unnecessary. They hone to connect the concern Team. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/01	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community's daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council's stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/01a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. 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, children and disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/01b	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/01c	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-122	Imran Khaled		Reg19-E-122/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	I can confirm that this place is good for everyone use. There is too much overcrowding we need space and help from council there is not enough space for women. We need space for women also. Because of tall these issues, we can’t hold bigger gathering and there is too much overcrowding. If the service improves, many people will be happy and this will help the community. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	2. I want the suggestion of this official landowner to be accepted .	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-124	Ashikhusen Mansuri		Reg19-E-124/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	Very good place for everybody to come and use for all purposes. So many people are coming and not enough space. We need space for women also because so many women wan to come and join. we can’t hold bigger gathering and there is too much overcrowding. If the service improves, many people will be happy and this will help the community. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	2. I want the suggestion of this official landowner to be accepted properly please	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-125	Akib Vahora		Reg19-E-125/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council did a proposal which is irrelevant and inappropriate. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	Concerned community has their plans for development and growth. Kindly consult with them.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-126	Mohammad Shoabmuhammad Farooqwadiwala		Reg19-E-126/01	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	I can confirm that this place is good for everyone use. We need paces for womenfolk. So many women want to come but cant come because there is no space for them. They want to come and learn and practise and worship. If the service improves, many people will be happy and this will help the community also. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	2. I want the suggestion of this official landowner to be accepted .	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-128	Atik Shaikh		Reg19-E-128/02	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No					No	Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-128	Atik Shaikh		Reg19-E-128/02a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. 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, children and disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-128	Atik Shaikh		Reg19-E-128/02b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-131	Mohammada kib Bohara		Reg19-E-131/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-131	Mohammada kib Bohara		Reg19-E-131/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-131	Mohammada kib Bohara		Reg19-E-131/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-132	Mahamadfaiz an Vahora		Reg19-E-132/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and proposed without consultation. They are doing it without informing the community. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Concerned community has their plans for development ,Newham Council has to connect with them.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-133	Mohammed aftab jamadar		Reg19-E-133/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I am an active member of this community and im always using mosque facility here art abbey mills. I can confirm that this space is mostly overcrowding during gatherings, making it difficult to get many people. I want the space to be increased and so many people can come.	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-135	Faizan Vahora		Reg19-E-135/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-135	Faizan Vahora		Reg19-E-135/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-135	Faizan Vahora		Reg19-E-135/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-136	Yasir Ahmad		Reg19-E-136/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and they have not discussed with the concern community. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-137	Syed Sheryar Bacha		Reg19-E-137/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I am an active member of this community and I want to use this facility regularly without any problem and very much it is very overcrowded during pray times and creating problem. I want the space to be increased and so many people can come.	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-139	Moin Uddin		Reg19-E-139/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and they have not discussed with the concern community. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-140	Mohmed Zaid Gangat		Reg19-E-140/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and they have not discussed with the concern community. This Plan is unnecessary. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy N7 SA1]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-141	Umarfarooque Shah		Reg19-E-141/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I live in this community and I wan to use this space regularly without any problem. I want this to be made	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Reg19-E-142	Yasar Osman		Reg19-E-142/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As an active member of this community who regularly utilises the existing facilities for my spiritual needs. The limited capacity often results in overcrowding during gatherings, making it difficult to foster the kind of inclusive and serene environment that is essential for our spiritual practices. Furthermore, the lack of essential amenities, such as proper seating for women,, and designated areas for various activities, significantly hinders the community’s ability to fully benefit from the space. These shortcomings restrict our ability to host larger events, accommodate diverse age groups and other demographics, and in creating an atmosphere conducive to personal reflection and collective growth. Expanding and improving the premises would greatly enhance the spiritual, social, and cultural experiences for all members of the community, ensuring that our needs are met more effectively	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-143	MD Tajul Alam		Reg19-E-143/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This place is very important for us as we always come here for prayers and our social gathering and social activities My family and my friends including women require this place for our wellbeing	I will immensely appreciate a lot if you grant permission to the land owners of the land to build this place as a mosque and housing	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-144	Mohammad Hashim Noorgat		Reg19-E-144/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and they have not discussed with the concern community. This Plan is unnecessary. Concern community is impacted because of this plan. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-145	Aman Vahora		Reg19-E-145/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							NewHam Council proposal is biased and they have not discussed with the concern community. This Plan is unnecessary. Concern community is impacted because of this plan. They are not taking concern communities view. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note 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.

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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-146	Jamil Ahmed Sidat		Reg19-E-146/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This is my local mosque, I want the council to grant permission to make services for me and my family and so many other families. I want space for men and women also	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	Comment noted. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-148	Taleb Baamran		Reg19-E-148/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As an active member of this community who regularly uses the facilities for my spiritual needs, I can attest to the fact that the current premises are inadequate in terms of both space and amenities. We use this place for prayers and social gathering. Its very important for me my family and the community.	2. Therefore, I recommend acknowledging the significance of faith in town planning by accepting the Landowner's suggestion	Comment noted. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-149	Mohammed Abdul Junaid		Reg19-E-149/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This Place is very important for us as we always come here for prayers and our social gathering and social activities. My family and my friends including woman require this place for our wellbeing.		Comment noted.
Reg19-E-150	Asif Bhikhi		Reg19-E-150/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I with my family members and friends utilise this place for prayers and social gathering on the regular basis.	We strongly request the council to grant permission to the land owners of the land to build this place as a mosque as we need big place for Eid and other social gathering aand also grant permission for housing	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-151	MD Masud Rana Bhuiyan		Reg19-E-151/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No					No	Inadequate Facilities: The insufficient facilities that are essential to our community's everyday requirements are not addressed in the existing design. Worshippers' access is restricted by the present structure, which is too small especially for women and children. The absence of sufficient space impedes complete involvement and undermines the inclusiveness that is crucial for a diverse borough such as Newham. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-151	MD Masud Rana Bhuiyan		Reg19-E-151/02a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. 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, children and disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-151	MD Masud Rana Bhuiyan		Reg19-E-151/02b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-152	Moosa Ali		Reg19-E-152/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As an active member of this community who regularly utilises the existing facilities for my spiritual needs, I can attest to the fact that the current premises are inadequate in terms of both space and amenities. The limited capacity often results in overcrowding during gatherings, making it difficult to foster the kind of inclusive and serene environment that is essential for our spiritual practices. Furthermore, the lack of essential amenities, such as proper seating for women, and designated areas for various activities, significantly hinders the community's ability to fully benefit from the space. These shortcomings restrict our ability to host larger events, accommodate diverse age groups and other demographics, and in creating an atmosphere conducive to personal reflection and collective growth. Expanding and improving the premises would greatly enhance the spiritual, social, and cultural experiences for all members of the community, ensuring that our needs are met more effectively	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	Comment noted. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-153	Yoonus Uvais		Reg19-E-153/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	Yes						No	The place of which the content is referred to is not owned by the Newham council, so I believe due to the underlying true no such construction is formidable in such location due to this. So I am highly concerned that no such construction or redevelopment should be taking on such place due to the ownership of the land being out the jurisdiction of Newham council.	I feel no such modification should be made on this land as the council has no authority to enforce the plan and should therefore cancel the plans that they feel fit to carry out.	Comment noted.
Reg19-E-154	Anes Uvais		Reg19-E-154/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	Yes						No	The place of which the content is referred to is not owned by the Newham council, so I believe due to the underlying true no such construction is formidable in such location due to this. So I am highly concerned that no such construction or redevelopment should be taking on such place due to the ownership of the land being out the jurisdiction of Newham council.	I feel no such modification should be made on this land as the council has no authority to enforce the plan and should therefore cancel the plans that they feel fit to carry out.	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-155	Zebunnisha Waza		Reg19-E-155/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	It is my dream to turn the current premises (which exists with inadequate space and facilities for female prayer and wheelchair users) into Newham's first female and male facility community Mosque, helping to incorporate diversity into our community.	I therefore urge you to consider the needs of our community in terms of members like elderly and wheelchair users who are restricted access currently by accepting the Landowner's inclusive proposal which is focussed on multipurpose usage through building retail shops and housing infrastructure alongside the accessible community Mosque.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 disabled individuals, the elderly, women and children of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Westham is situated in proximity to the Three Mill as an existing place of worship in use within catchment to the Three Mills and Manor Road and Westham station as a community opportunity area. The whole wider densely populated area is currently defficient in purpose-built mosques, but the local plan had allocated only small-scale faith use at Abbey Mill Site despite evidence-based needs. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		Comment noted. Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/04	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Major convergence taking place with in Newham, tall tower housing development buildings in surrounding currently under construction and future proposals of housing development needs throughout Newham. Convergence impact is inevitable, it will add additional pressure on the existing social infrastructure, which is already far reaching for the vast majority of community residents who do not have faith mosque facilities (social infrastructure) in the borough. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	• Stratford and Westham Neighbourhood has a huge for purpose built Mosque and and much needed Housing at Abbey Mill Inc multi use mosque facilities for places of worship fir male and female, in particular the Muslim Muslik community who require space throughout the Day on Friday abd Eid Prayers and ramdhan,therefore modern capacity mosque is required exist in other borough despite lesser population in city of London. Faith groups are primarily located between Barking and Romford Road – lots of people live in those spaces but not many facilities at Stratford abd westham with good transport link so spill over on to existing mosques during Fridays and Eid and weekdays can be minimised with in these boundaries. • local communities travel 30-60 minutes on average to reach places of worship abd find that there are no space available on Fridays and during celebration days. • Many deferent types of community facility are being re-purposed and used by faith groups not just for worship but to host a range of community services and activities. Education spaces have been fully utilised.there are oversubscribed children evening islamic education at every single exsiting mosques in Newham being used 6 days a week in evening and weekends.	Comment noted. A thorough and robust approach has been taken to identify locations suitable for tall buildings, this is evidenced in the Tall Building Annex and ahs informed Policy D4. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. It should be noted that the 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 evidence through Newham’s Places for All Strategy (2023 - 2027). However, 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. 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 N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element). 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/05	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	There is already planning consent awarded to the Tall Tower housing construction underway which is obseciuring Grade 2 listed pumping station adjoining westham Station. As to Abbey Mill site grade 2 listed pumping station is obscured from greenery- westham station - Channel Sea building and tall tower currently under construction so it is not of the relevance ti visual imoact as an evidence,but planning design mechanism can be taken in to considration when site owners are given oportunity. As to the opportunity area of Stratford tourist shopping attraction and housing convergence growth. Abbey Mill is strategically located to serve business employees of the catchment town centre of DLR Stratford Dockland to Custom House and Canning Town. With a growing Muslim community and a very good transport link. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		Comment noted. A thorough and robust approach has been taken to identify locations suitable for tall buildings, this is evidenced in the Tall Building Annex and ahs informed Policy D4.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/06	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	myself and the community will be denied the opportunity to enjoy much-needed purpose-built large facilities at Abbey Mill Mosque as a future place of worship for spiritual well-being retreat for a healthier mental mind. Therefore, it is imperative that the draft local plan reflect this need of the vast majority of the Muslim population, as there are no alternative larger sites available in Newham to cater to the needs. Fridays and Eid Prayers are oversubscribed as people from far within Newham Borough regularly utilise places of existing faith in Eastham - Forest Gate - Manor Park Area. Therefore, the draft proposal for Abbey Mill N7 SA1 should be reconsidered on the local plan land use for larger Faith Facilities, similar capacity in nature to Regents Park's existence at West London Borough. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/07	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Owners are proposing for the land use at Abbey Mill with Larger Mosque with additional steps to accommodate with some housing for Newham East London too, and land use on planning should be allocated for Abbey Mill N7 SA1 local plan. Once it is developed due to the very good transport link and greenway cycle and walk route, it will be a focal point to borough for diversity vision (admiration) not only for the Muslim community, but for the tourists and visitors to the international city of London, which will add economic growth and employment for the borough and surrounding area. Westham and Stratford City are already adapted to the international standard, and the Abbey Mill site will further enhance the diversity image nationally and internationally. Therefore, I object to the draft land use proposal on the local plan proposal, and it should be reconsidered to allow a once-in-a-lifetime opportunity to have this site allocated to a large social community infrastructure mosque with much-needed housing as well. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		Comment noted.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/09	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Additionally, it will devalue this land site and reward other cooperative land sites surrounding (Abbey Mill) at the expense of privately owned land if the key route is not contested. LA town centre planners failed to approach for the feasibility of this key route for an alternative negotiated approach with the owner, which I had enquired about as I hold interest in this site as a Newham resident. The community is currently using the site as a social infrastructure. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/10	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As to flooding risk assessment, it is for the Thames Water responsibility to put in place adequate flood defence mechanisms. There has never been an occurrence of flooding at this land site while ownership of privately owned land Modern scientific architecture is well equipped to deliver design models if deemed necessary. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan's approach to mitigating flood risk is inline with national policy requirements. The site meets the criteria, set out in footnote 55 of the National Planning Policy Framework (2023), to provide a site specific flood risk assessment. This is the responsibility of the developer. The flood risk assessment will support the delivery of flood resistant development ensuring the safety of future users and occupiers of the site. Please note that Thames Water have no responsibility for flood defence mechanisms on the River Lea. The Environment Agency will be a statutory consultee who will advice on the suitability of the flood risk assessment. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/11	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Newham had already allocated purpose-built religious sites to other faith communities within the borough of Newham to enjoin. Mechanism of Citizen Assembly engagement approach for local Plan development would not be independent as it's citizen are made up of beneficiary of Section 106 development,rather wider community and land owners would be appropriate channel of engagement in formation of local plan design for this site. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-158	Ibrahim Khankhara		Reg19-E-158/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No					No	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively. The existing facilities are too small to cater to the needs of all worshippers, particularly women, children, and those with accessibility challenges. This lack of space restricts participation, marginalizes key segments of our community, and undermines inclusivity. It is imperative that the size and design of any proposed replacement facility be driven by the actual needs and growing demands of our diverse congregation. Retaining the same size or failing to account for future growth would not only perpetuate the current inadequacies but also stifle our community’s potential for growth, connection, and unity. A well-designed space should foster a sense of belonging for all, enabling us to welcome new members while addressing the unique needs of the existing ones. Due to the inadequacies of the current facility, many worshippers are compelled to seek alternative locations for their religious practices. This fracturing of our community weakens our shared bonds and limits opportunities for collective engagement, making it difficult to foster a strong, supportive community spirit. [originally against SI1, SI2 and SI3 - taking forward N7.SA1]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 disabled individuals, women and children of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-158	Ibrahim Khankhara		Reg19-E-158/01a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Our community is eager to collaborate with the landowners and relevant authorities to develop a replacement facility that truly meets our current and future needs. We believe that by working together, we can find a mutually beneficial solution that not only addresses the requirements of our congregation but also aligns with the broader goals of the community. A partnership of this nature would foster goodwill and ensure that all stakeholders are considered throughout the planning and development process.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-158	Ibrahim Khankhara		Reg19-E-158/01b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No		Furthermore, we would like to highlight the inflexibility of the current policy regarding the size of the facilities. The existing guidelines are outdated and fail to reflect the evolving needs of our community. We strongly advocate for a comprehensive needs assessment to be conducted, ensuring that any proposed facility accurately addresses the diverse and dynamic requirements of our congregation. A "one-size-fits-all" policy is insufficient, and the unique character of our community demands tailored solutions that prioritize inclusivity and growth.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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.
Reg19-E-158	Ibrahim Khankhara		Reg19-E-158/01c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		In addition to serving the social needs of our community, the development of this site would contribute to local economic growth, particularly in the construction sector. It would also generate employment opportunities, further supporting the borough's development goals. However, we have concerns that the proposed key transportation route has not been sufficiently addressed in relation to the site's potential for housing and economic expansion. Careful consideration and strategic planning are essential to ensure that the development fully aligns with the area's growth trajectory, maximizing both housing opportunities and economic benefits.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-159	Mohamed Umarji		Reg19-E-159/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	Blan k						No	1.it's my dream to have 1st male and female mosque for newham [originally against SI1, SI2 and SI3, N7.SA1 - taking forward N7.SA1]	suggestion is to build a mosque and school and housing and a community centre	Comment noted.
Reg19-E-160	Uzair Vardalia		Reg19-E-160/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							I do not agree with the Markaz Proposal By New Ham Council. [originally against SI1, SI2 and SI3, N7.SA1 - taking forward N7.SA1]	New Ham Council Have to take a meeting with Land Owner and community.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-161	Khadija Khankhara		Reg19-E-161/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As an active member of this community who wishes to regularly utilise the facility for my spiritual needs, I can attest to the fact that the current premises are inadequate in terms of both space and amenities. The limited capacity often results in overcrowding during gatherings, making it difficult to foster the kind of inclusive and serene environment that is essential for our spiritual practices. Furthermore, the lack of essential amenities, such as proper seating for women,, and designated areas for various activities, significantly hinders the community's ability to fully benefit from the space. These shortcomings restrict our ability to host larger events, accommodate diverse age groups and other demographics, and in creating an atmosphere conducive to personal reflection and collective growth. Expanding and improving the premises would greatly enhance the spiritual, social, and cultural experiences for all members of the community, ensuring that our needs are met more effectively [originally against SI1, SI2 and SI3, N7.SA1 - taking forward N7.SA1]	2. Therefore, I recommend acknowledging the significance of faith in town planning by accepting the Landowner's suggestion.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-163	Mohmmadhh aifil Imtiaz		Reg19-E-163/002	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The facility would allow for much more.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-165	Ilyas Bharuchi		Reg19-E-165/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No							• The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. • It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. • Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. • Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-165	Ilyas Bharuchi		Reg19-E-165/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No									• Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved.	Comment noted. Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-165	Ilyas Bharuchi		Reg19-E-165/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No									• Additionally, we would like to address the inflexibility of the current policy regarding the size of the facilities. We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community. [refer to the CFNA]	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 clause 1.a sets out that the delivery of new community facilities on identified site allocations are subject to a needs-based assessment at the time of delivery. The implementation text for Policy S12.1 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-165	Ilyas Bharuchi		Reg19-E-165/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No									• There is a lack of purpose-built facilities for individuals with disabilities. These facilities would help the socially isolated elderly population connect with others. The draft proposal does not fully utilize the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately-owned land has been acquired to meet the future needs of the community.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-165	Ilyas Bharuchi		Reg19-E-165/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No									The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-167	Haroon Memi		Reg19-E-167/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As a member of this community who uses the existing premises for my spiritual needs, I can attest that there is currently inadequate space and facilities to obtain maximum community benefit. There is also an absence of female prayer facilities in the existing premises due to inadequate space which has an impact on the female faith community. My Father also wishes to use the Facilities however is anable to do so as there is a lack of Disabled persons facilities.	I urge you to therefore recognise faith policy in town planning by adopting the Landowner's proposal.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 individuals with disabilities and women. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																			LB Newham Response
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Proposed modifications and explanation
																			The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-168	Shirin Memi		Reg19-E-168/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	There is an absence of female prayer facilities in the existing premises due to inadequate space which has an impact on the female faith community. I urge you to therefore recognise faith policy in town planning by adopting the Landowner's proposal. Our proposal addresses the issue of absence of female prayer facility and the housing crisis by allocating land space for housing and a community Mosque. The Landowner's proposal will also ensure the community Mosque is inclusive as it enables accessibility for elderly and disabled individuals in our tight-knit community.
																			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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/002	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce					Blank	Blan k						Blank	[1. INTRODUCTION] Berkeley Homes is delivering TwelveTrees Park ('the Site') in the London Borough of Newham. Berkeley Homes secured planning permission for TwelveTrees Park in August 2018 and implemented the extant permission in 2021. This planning permission envisaged nothing less than a new neighbourhood. A neighbourhood with a new urban park at its core; a neighbourhood reconnected to transport; and a neighbourhood providing an environment in which thousands of people could live and work. Construction of that neighbourhood has now begun. Visitors to site will see the groundwork for the first Phase of public realm; a new entrance into West Ham Underground Station together with new bridges over the railway; and the first 1,205 new homes coming out of the ground above new shops and workplaces, adjacent to the site of a new secondary school. Delivering the first phase of TwelveTrees Park has been a huge success for all stakeholders involved - the GLA, LBN and Berkeley Group - an ambitious, award winning and transformational partnership that has delivered despite the headwinds faced across the industry. However, it is as a result of some of these headwinds that the Applicant now needs to take stock if they are able to deliver the remaining phases of development with the same effect as the first. Whilst the Applicant has worked hard to adapt the original permission to address these headwinds wherever possible through the Phase 1 build, it became clear, in order to capture all of the changes that would need to be made, that a fresh approach was required. An approach that holds onto what is good about the extant permission and seeks a variation to improve upon it and ensure deliverability has been submitted in the form of a Section 73 Application to amend the extant planning permission and Reserved Matters Application for Phase 2.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/036	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce					Blank	Blank						Blank	Draft Site Allocation N7.SA2 Twelvetreepark and Former Bromley By Bow Gasworks TwelveTrees Park sits within site allocation N7.SA2. along with Bromley By Bow Gasworks. Berkeley Homes welcomes LBN’s agreement that this is a location suitable for residential and mixed use development. However, we raise a series of concerns with regard to the current drafting of the site allocation which we consider to be overly restrictive and risks stifling development. We therefore make the following comments: <u>Design Principles - Residential development, employment uses, main town centre uses and social infrastructure including community facilities, health centre, education uses, and open space</u> Berkeley Homes welcome’s the range of uses identified as suitable for this site. Given the highly accessible location of TwelveTrees Park, it is considered to be an ideal location for development and this is reflected in the range of uses included in the site allocation. Notwithstanding this, we suggest that there is an opportunity to consider a wider range of employment uses, with the following amendment:	Residential development, employment generating uses, main town centre uses and social infrastructure including community facilities, health centre, education uses, and open space We consider the addition of ‘generating’ will allow for a wider range of employment uses to come forward, particularly given the latest Employment Land Review directs office floorspace to Stratford and not in this location. There is an aspiration to deliver a vibrant and mixed community at TwelveTrees Park and policy should be flexible to allow this to come forward in a variety of ways.	This wording change is not supported. We did not consider this change to be necessary as the use of 'employment -generating floorspace' is not consistent with the terminology in the Plan. The Council considers the policy to be effective as main town centre uses are included as part of the development principle of relevant site allocations as informed by evidenced needs and this policy explicitly required development to deliver floorspace in conformity with the development principles set out in the site allocations.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/037	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce					Blank	Blank						Blank	[TwelveTrees Park sits within site allocation N7.SA2. along with Bromley By Bow Gasworks. Berkeley Homes welcomes LBN’s agreement that this is a location suitable for residential and mixed use development. However, we raise a series of concerns with regard to the current drafting of the site allocation which we consider to be overly restrictive and risks stifling development. We therefore make the following comments:] <u>Design Principles - Development on the remainder of the site should deliver the same quantity of employment floorspace as the permitted scheme.</u> Berkeley Homes has undertaken extensive consultation with LBN Officers since implementation of the planning permission to ensure the delivery of TwelveTrees Park. This has resulted in the submission of a series of non-material amendments and most recently a Section 73 and Reserved Matters Application. Given the scale of TwelveTrees Park, it is inevitable that adaptations to the scheme will be needed in order to react to market forces and environmental changes. We therefore find this drafting to be overly restrictive and does not consider that masterplans need to adapt in order to ensure their continued delivery. We therefore suggest the following amendment:	Development on the remainder of the site ~~should~~could deliver a range of employment generating uses the same quantity of employment floorspace as the permitted scheme.	This wording change has not been made. We did not consider this change to be necessary as this site is required to provide employment uses given the history of the site allocation and the development principles already address market testing for the uses that could be provided on the site. Local Plan Policy J1 also requires applications to submit an Economic Strategy to demonstrate market needs. Furthermore, the term 'employment generating use' is not consistent with how employment uses are referred to across the Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/039	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce					Blank	No						Blank	[TwelveTrees Park sits within site allocation N7.SA2. along with Bromley By Bow Gasworks. Berkeley Homes welcomes LBN's agreement that this is a location suitable for residential and mixed use development. However, we raise a series of concerns with regard to the current drafting of the site allocation which we consider to be overly restrictive and risks stifling development. We therefore make the following comments:] <u>Infrastructure requirements - Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8</u> TwelveTrees Park is an implemented planning consent and the delivery of Phase 1 is well underway. This means that there is an existing waste management strategy in place. It would be impractical and unviable to amend the strategy secured within the extant permission. We therefore suggest that this wording be deleted. Berkeley Homes consider this policy as drafted is not justified. The application of the draft site allocation is likely to discourage development and unduly restrict LBN's ability to deliver the wider objectives of the DSLP. The policy as drafted is also therefore not effective. Berkeley Homes consider that the proposed changes set out above would fix these issues and ensure full compliance with national policy and ensure the policy is effective and sound.	This wording change is not supported. We did not consider this change to be necessary as 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 scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.	
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/16	Neighbourhoods	N7 Three Mills		4.30 Profile section				Yes	Yes							N7 Three Mills The Authority supports the additional wording added to the Three Mills Profile under paragraph 4.30 which states “and part of the neighbourhood, most notably Three Mills Island, is in the Lee Valley Regional Park”.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/17	Neighbourhoods	N7 Three Mills		Vision	3			Yes	Yes							The changes to the vision for Three Mills under point 3 as set out in red font below are noted and supported. Whilst the wording added is different to that proposed by the Authority it does reflect the objectives for Three Mills set out within the Park Development Framework to see a heritage based visitor hub delivered building on existing visitor attractions and heritage assets. The Vision for Three Mills will be achieved by 3. supporting the restoration and conservation of heritage buildings at Three Mills to both preserve the character of the area and sensitively update facilities, including the delivery of an appropriately scaled visitor hub, to ensure they are fit for purpose, enhance the existing employment uses and better promote access to, and understanding of, the heritage buildings at Three Mills;		Support noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-175	Ibrahim Waza		Reg19-E-175/003	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No					No	Merely maintaining the size of the current facility will not resolve these issues; it is crucial that any proposed replacement offers sufficient capacity that reflects the actual needs of our growing congregation. The current facility's shortcomings have already compelled many worshippers to seek alternative locations for their religious activities, which undermines community cohesion and spirit. I also in the strongest terms oppose the Key Route proposal in the Local Plan, as it will restrict the Mosque's size, limiting community participation in prayer and access to community facilities, and failing to address the limitations of the existing small facility. Moreover, while Newham celebrates its diversity, the current draft proposal overlooks the essential infrastructure needed to support and enhance this vibrant community. In contrast, the landowner's plan thoughtfully incorporates retail shops and housing alongside the Mosque, promoting inclusivity. It is essential that the Local Plan is revised to effectively address these deficiencies, creating an environment in which all community members can thrive and have their concerns acknowledged and addressed. Therefore, I strongly urge you to consider the landowner's proposal, which prioritizes the welfare of the community.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-175	Ibrahim Waza		Reg19-E-175/003a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Our community is eager to collaborate with landowners and authorities to develop a new facility that genuinely meets our needs, fostering partnerships that benefit all stakeholders.	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-175	Ibrahim Waza		Reg19-E-175/003b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		The current rigid policy regarding facility size should be reevaluated through a thorough needs assessment to better align with our community's changing demands, promoting inclusivity and participation, particularly among women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-175	Ibrahim Waza		Reg19-E-175/003c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Furthermore, the absence of purpose-built facilities for individuals with disabilities underscores the importance of inclusive design that can enhance social connections for our elderly population facing isolation.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-175	Ibrahim Waza		Reg19-E-175/003d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Additionally, the draft proposal does not capitalise on land for both much-needed housing and expansive community facilities, a gap not present in other progressive boroughs. We also call for the plan to address the proposed key transit routes, ensuring they support the housing and economic growth potential that is vital for the area. By doing so, the plan will not only comply with legal standards but will also cultivate a vibrant and diverse community, boost economic growth in the construction sector, and create local employment opportunities, ultimately leading to a stronger and more cohesive Newham.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
Reg19-E-182	Muhammad Patel		Reg19-E-182/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											</

Reg19-E-187	Aamina Hafeji		Reg19-E-187/003	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Simply retaining the same size as the current facility will not rectify these deficiencies; it is essential that any proposed replacement ensures ample capacity reflective of our growing congregation's actual needs. The inadequacies of the present facility have already forced many worshippers to seek alternative venues for their religious practices, undermining community cohesion and spirit. I also completely object to the Local Plan's Key Route proposal as it will limit the size of the Mosque, hindering community participation in prayer and accessing community facilities, ultimately not addressing the concern of the limitations of the existing small facility. Furthermore, while Newham prides itself on its diversity, the current draft proposal neglects to incorporate diverse infrastructure that would support and enhance this rich community, as the landowner’s plan, with its careful consideration and inclusivity, enables retail shops and housing infrastructure alongside the Mosque to be built. It is imperative that the Local Plan be revised to responsibly address these shortcomings, fostering an environment where all members of our community can thrive in a way which takes onboard their concerns rather than neglecting them. I therefore urge you to take on the proposal drafted by the landowner as it considers the concerns of the wellbeing of the faith community.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.
Reg19-E-187	Aamina Hafeji		Reg19-E-187/003a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To meet the community aspirations and address the community concerns, please consult the Landowner who has carefully considered the wellbeing of the wider community through building retail shops, housing alongside a large enough Mosque enabling male and female usage. This is important to me as someone who is unable to use the current premises for my religious worship due to inadequate facilities yet	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				the Local Plan is completely failing to address these inadequacies.	submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-188	Zakaria Yusuf		Reg19-E-188/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	[blank response]	[blank response]	No comment received but response noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-193	Hajra Hafeji		Reg19-E-193/003	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Simply retaining the same size as the current facility will not rectify these deficiencies; it is essential that any proposed replacement ensures ample capacity reflective of our growing congregation's actual needs. The inadequacies of the present facility have already forced many worshippers to seek alternative venues for their religious practices, undermining community cohesion and spirit. This is important to me as someone who is unable to use the current premises for my religious worship due to inadequate facilities yet the Local Plan is completely failing to address these inadequacies. [...] Furthermore, while Newham prides itself on its diversity, the current draft proposal neglects to incorporate diverse infrastructure that would support and enhance this rich community, as the landowner’s plan, with its careful consideration and inclusivity, enables retail shops and housing infrastructure alongside the Mosque to be built. It is imperative that the Local Plan be revised to responsibly address these shortcomings, fostering an environment where all members of our community can thrive in a way which takes onboard their concerns rather than neglecting them. I therefore urge you to take on the proposal drafted by the landowner as it considers the concerns of the wellbeing of the faith community.	I therefore urge you to consider the needs of our community in terms of members like females and wheelchair users and children who are restricted access currently due to inadequate space by accepting the Landowner's inclusive proposal which is focussed on multipurpose usage through building retail shops and housing infrastructure alongside the adequately sized and diverse community Mosque.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-193	Hajra Hafeji		Reg19-E-193/003a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I also completely object to the Local Plan's Key Route proposal as it will limit the size of the Mosque, hindering community participation in prayer and accessing community facilities, ultimately not addressing the concern of the limitations of the existing small facility.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/083	Neighbourhoods	N7 Three Mills														13 Neighbourhood N7 Three Mills 13.1 St William remains supportive of the 15-minute neighbourhood concept that underpins LBNs proposed spatial strategy and considers it a sound approach when considering development proposals, looking beyond individual sites and providing the ability to shape growth at a more local and detailed scale. 13.2 The inclusion of the Bromley by Bow and TwelveTrees Park sites (N7.SA2) (within Neighbourhood N7 Three Mills is welcomed and we consider that these sites in combination can collectively deliver the components needed to create a new neighbourhood.	Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments Introductory text The neighbourhood's riverside location will be enhanced, including improving views across the water, access to the water where possible or feasible , and the natural environment along the water. Walking and cycling routes, particularly the Greenway, the Lee Navigation towpath and the Leaway, will be improved. The severance of the neighbourhood's transport infrastructure will be reduced through new bridges where possible or feasible and improved wayfinding and easy to follow, safe, green and accessible walking and cycling connections to public transport and the neighbourhood's open spaces.	A change to this policy approach has not been made. 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. The Strategy has informed our policy approach to the borough's access to water and green spaces. Increasing public access to green and water spaces across the neighbourhood a key part of the neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GWS2 and GWS3 which provide further detail on access to green space and access to and along the water. The extent to which improvements are made to public access to these spaces will be determined during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/084	Neighbourhoods	N7 Three Mills														Vision 13.3 St William is pleased that the overall vision for Neighbourhood N7 'Three Mills' is for a high level of growth to be delivered through the transformation of these sites which will include an uplift in homes, employment generating uses, community facilities and a new Local Centre. The vision for a high level of growth should be reflected in Part 1 of the vision as well which currently only outlines support for a moderate uplift in density in 'enhance' areas. St William consider that 'moderate' should be updated to refer to a 'significant' uplift in density to align with the high level of growth envisaged for this neighbourhood that has been supported by LBN officers, and also to reflect the existing low density land uses. 13.4 This would also align with growth that is underway in this neighbourhood through the implementation of the consented development at TwelveTrees Park and the proposals at Bromley by Bow, which have secured resolution to grant.	Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments Vision Point 1 Supporting a moderate significant uplift in density in 'enhance' areas, where, through appropriate typologies to the site's context, development enhances the character of the neighbourhood and consolidates the urban form.	This wording change is not supported. We did not consider this change to be appropriate as the Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, part of the neighbourhood is classified as conserve and enhance area and part as transform. The Council considers that the vision for N7 Three Mills Neighbourhood supports an appropriate balance between a moderate uplift of enhance areas [N7.1] and the transformation of identified site allocations [N7.2], which have already taken into account the high level of accessibility of the sites and their contribution to the growth of the neighbourhood. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/085	Neighbou rhoods	N7 Three Mills															Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments Vision Point 4 supporting the transformation of N7.SA1 Abbey Mills, N7.SA2 Twelvetrees Park, Former Bromley By Bow Gasworks and N7.SA3 Sugar House Island, in accordance with the Abbey Mills, West Ham Station and Stratford High Street Tall Building Zones and Local Plan Policy D4 and having significant regard to their riverside context, ~~and~~ the neighbourhood’s heritage assets; and the Site’s location within a Tall Building Zone and Poplar Riverside Opportunity Area;	This wording change is not supported. We did not consider this change to be necessary as N7 Three Mills Neighbourhood Vision point 4 already reference the relevant Tall Building Zones allocations. Furthermore, the location of the sites within the Poplar Riverside Opportunity Area has already been considered when assessing the character of the neighbourhood and suitable locations for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/086	Neighbou rhoods	N7 Three Mills														13.5 The aspiration for the delivery of new residential moorings in suitable locations with appropriate ancillary facilities (Part 8) is supported in principle however as previously noted this should be subject to feasibility and deliverability, as this will be subject to third party approval. There may be technical reasons such as flood levels, the tidal nature of the River Lea, the need for river walls and flood defence barriers that may preclude the ability to delivery residential moorings. St William consider that this requirement should acknowledge that the delivery of new residential moorings is subject to feasibility and viability.	Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments supporting the delivery of new residential moorings where feasible in suitable locations with appropriate ancillary facilities	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy clause does not set out specific requirements for these uses to be delivered. The policy works alongside GWS2 which provides further detail on where these uses would be supported. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/087	Neighbou rhoods	N7 Three Mills														13.6 St William remain in support of the objectives to improve conditions for walking, cycling and public transport (Part 10), however requirements for improvements and new crossings can only be achieved where feasible and where site ownership permits. St William support the adoption of any local roads that would enable improvements to be made for the benefit of the wider neighbourhood.	Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments improving conditions for walking, cycling and public transport by: c. requiring and supporting new crossings and station access where feasible at Twelvetrees Crescent and Manor Road to reduce severance and to improve connectivity to the wider network of neighbourhoods;	A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements have been justified by up to date evidence base, through the Newham Characterisation Study. The Study has informed our policy approach to the borough’s connectivity and natural infrastructure. The extent to which these improvements are delivered will be determined during the pre-application and application stage. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/088	Neighbou rhoods	N7 Three Mills														13.7 With reference to Part 11, St William remains supportive of the requirement to retain existing mature trees, maximise the provision of new open space and green infrastructure and enhance existing Sites of Importance for Nature Conservation. However, in line with comments made in the Regulation 18 representations and as reflected in the proposals for Bromley by Bow, the exceptional circumstances of gasworks sites mean that the required remediation to enable the redevelopment of these sites necessitates the removal of all existing vegetation including trees in order to make the site safe and publicly accessible.	Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments retaining existing mature trees except in exceptional circumstances and maximising the provision of new open space, green infrastructure and green links and the opportunities to increase biodiversity and enhance existing Sites of Importance for Nature Conservation, including through enhancements to the Greenway and the provision of new parks at N7.SA1 Abbey Mills and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks;	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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/089	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													Site allocation N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks 13.8 St William provides the following comments on the draft N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks site allocation and also provide the suggested revisions to the site allocation in track changes further below for ease of reference. It should be noted that comments on the draft N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks site allocation are in relation to the Bromley by Bow Gasworks only. Separate representations have been submitted that relate specifically for TwelveTrees Park.		Comment noted. A separate response has been provided to St William Homes LLP regarding the comments raised on site allocation N7.SA2.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/090	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce														Heritage Designations Within the Site: Bromley by Bow Gasholders (Grade II) Within the vicinity of the Site Adjacent to: Three Mills Conservation Area Engine House at West Ham Pumping Station (Grade II) Abbey Mills Pumping Station (Grade II*) Stores Building at Abbey Mills to West of Pumping Station (Grade II) Offices (Former Superintendent’s House) at Abbey Mills (Grade II) Gate Lodge at Abbey Mills (Grade II) Gates and Gatepiers at Entrance to Abbey Mills Pumping Station (Grade II) Bases of Pair of Former Chimney Stacks at Abbey Mills to North West and South East of Pumping Station (Grade II) Ancillary Pump House To South East of Pumping Station (Grade II) Nos 116 to 130 (even) Abbey Lane (Grade II) C Station, with associated Valve House, Abbey Mills Pumping Station (Grade II) The Ironmongers Stone in Leather Gardens to the East of Abbey Road (Grade II) Tide Mill (known as the House Mill) (Grade I) Offices opposite Clock Mill (Custom House) (Grade II) Clock Mill and 3 drying kilns (Grade I) Paved Roadway extending from west side of House Mill to wall and gate on east side of clock mill (Grade II) The Still, 3 Mills Distillery (Locally Listed) Twelvetreets Crescent Bridge (Grade II) War Memorial (Grade II) The Old London Gas Museum (Locally Listed). Canning Town / Newham Way Archaeological Priority Area (Tier 3) Statue of Corbett Woodhall (Grade II) Dowgate Wharf P B Burgoyne and Company Limited Warehouse (Grade II)	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is effective. For heritage designations, the wording 'in the vicinity of' has been used which is considered to be effective and is consistent across all site allocations. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/091	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													§ Map – we have a number of comments on the proposed map and for ease have drafted a proposed alternative to help illustrate our comments. Overall, it is felt that there is too much detail on the proposed map and the approach taken within the adopted site allocation would be more appropriate. Specifically, we suggest the following amendments: § The connection that is shown over the River Lea where the existing bridge is located is incorrect. Connections over the River Lea can only be safeguarded for as these proposed connections are outside of the St William’s ownership.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments]	A change to this policy approach has not been made. We did not consider this change to be necessary as 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. The key route over the River Lea shown in the map reflects the long term aspiration of connecting the site with the Leaway Walk in line with Local Plan’s sustainable strategy aspiration of improving the quality of the Leaway sections in Newham and make it a continuous walking and cycling route. More details on the active travel action 4C to improve the Leaway Walk could be found in the Newham Sustainable Transport Strategy 2024. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/092	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													Development principles – St William provides the following comments on the development principles: § The requirement for the type and quantity of town centre uses to be consistent with a Local Centre designation is supported albeit St William would welcome clarification in this text or the text below in relation to prioritising light industrial uses on the gasworks site that other town centre uses would also be accepted to meet the need of the development. § As above, St William do not object to the principle of the requirement to prioritise industrial floorspace in the form of light industrial workspace suitable for microbusinesses and small and medium enterprises but do request that it is made clear in the site allocation that other town centre uses would also be acceptable on the gasworks site. This is reflected in the proposals that received resolution to grant.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Development principles Bow Gasworks – Suggested amendments] Residential development, employment uses, main town centre uses and social infrastructure including community facilities, health centre, education uses, and open space. The type and quantity of main town centre uses should be consistent with a local centre designation and Local Plan Policy HS1. Development should address the need for community facilities in the area by delivering new community facilities in Twelvetrees Local Centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3. The employment floorspace should be consistent with Local Plan Policy J1. The Gasholders portion of the site should prioritise industrial floorspace in the form of light industrial workspace suitable for microbusinesses and small and medium enterprises. There is potential for industrial floorspace to be tailored to specialist sectors including high tech media, low carbon and digital industries subject to robust market testing to demonstrate suitability. Development on the remainder of the site should deliver the same quantity of employment floorspace as the permitted scheme.	A change to this policy approach has not been made. We did not consider this change to be appropriate as town centre uses should be located within the proposed local centre in line with the town centre first principle, as set out in the High Street policies and the Town Centre Network Review Methodology Paper, and to ensure an appropriate level of town centre uses come forward in this location. The Council is satisfied that the plan is sound without the proposed change

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/093	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Development principle] § In addition to the above, St William continues to request that the text included within the adopted site allocation S11 in relation to the use of the listed gasholders is carried forward into the new Local Plan. St William requests that an additional point is added to the development principles section that states: Proposals will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [The employment floorspace should be consistent with Local Plan Policy J1. The Gasholders portion of the site should prioritise industrial floorspace in the form of light industrial workspace suitable for microbusinesses and small and medium enterprises. There is potential for industrial floorspace to be tailored to specialist sectors including high tech media, low carbon and digital industries subject to robust market testing to demonstrate suitability. Development on the remainder of the site should deliver the same quantity of employment floorspace as the permitted scheme.] Proposals will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/094	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													Design principles – St William provides the following comments on the design principles: § The requirement to ensure comprehensive design and development of the site (which relates to both the Bromley by Bow site and the TwelveTrees Park site) is understood and both sites have been designed and are being developed in the context of each other as sister companies’ part of the Berkeley Group. This has however been achieved through measures such as Design Codes and s106 obligations that require detailed design later down the line to demonstrate how the two sites can integrate. These mechanisms ensure that one site would not hold up the other from coming forward for development. Suggested amendments to this wording can be found in the mark up of the site allocation.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] Design Principles The site should be subject to a Design Code that seeks to ensure adjoining developments are considered designed and developed comprehensively in accordance with Local Plan Policy BFN2.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. The Local Plan policy BFN2 requires sites to be designed and developed comprehensively and is an approach to be adopted across all site allocations. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/095	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Design principles] § As currently drafted, building heights are required to be between 3 and 30 storeys with the greatest height intended to be at the eastern end of the Site stepping down towards the gasholder. This is not reflective of the TwelveTrees Park site planning permission nor the resolution to grant received for the Bromley by Bow proposals which allows for buildings in excess of 30 storeys at both the eastern and western end of the TwelveTrees Park site. Given both of the site’s location within an opportunity area and in close proximity to a number of transport interchanges, flexibility should be built into the policy for further height in line with recent applications and to reflect the site’s opportunity to deliver a significant number of new homes including affordable homes. Furthermore, notwithstanding the need to protect and enhance the listed gasholders, given the strategic nature of the Bromley by Bow gasholder and TwelveTrees Park sites, tall buildings are also needed to landmark this important site and heritage assets. There is in principle support for this approach from officers at LBN and LBN’s Design Review Panel who have provided constructive feedback on recent masterplan proposals for the Bromley by Bow gasworks site. The principle of tall buildings has also been established through the extant consent at TwelveTrees Park which were rigorously reviewed and concluded as beneficial through a design led approach. A design led approach should therefore be incorporated into the site allocation that enables tall buildings to be considered in the context of the wider design. This could be further supported by a Design Code. If heights need to be included they should be updated to reflect a range between 3 and 35 storeys as a guide. There should still be scope for buildings that extend above these heights to be considered on a case by case basis as long as they follow a design led approach and are subject to a robust townscape and visual impact assessment. § In addition, the design principles should also reiterate that the Site is located in a Tall Building Zone where tall buildings are supported.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Design Principles] Building heights should reflect the Site’s location within a Tall Building Zone and should be subject to a design led approach that could range from 3 to 35 storey, following a design led approach range between 9 — 21m (ca. 3 — 7 storeys) around the Gasholders and between 21 — 32m (ca. 7 — 10 storeys) in the rest of the site, with taller buildings up to 32m (ca. 10 storeys), 50m (ca. 16 storeys) and 100m (ca. 33 storeys) in defined locations to add wayfinding and with consideration given to marking the local centre. Massing should step down towards the Gasholders to sensitively integrate with the heritage assets. Buildings should set back from the watercourse to avoid overshadowing.	This wording change is not supported. We did not consider this change to be necessary as removing height parameters will undermine the delivery of policy D4. Furthermore, the site allocations requirements already address Tall Buildings designations and design-led approach considerations. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan Policy D9. 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 site 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 Building Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/096	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													[Design principles] § The requirement for ground floor active frontages within the Local Centre should be extended to be a requirement for the remaining part of the site allocation as well.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] The Twelvetrees Local Centre should be located in the Twelvetrees area of the site, in proximity to West Ham Station- ~~and provide~~ Ground floor active frontages should be provided throughout the Site. The health centre should be located in proximity to the Twelvetrees Local Centre and in an accessible and prominent part of the site.	A change to this policy approach has not been made. We did not consider this change to be appropriate as town centre uses should be located within the proposed local centre in line with the town centre first principle, as set out in the High Street policies and the Town Centre Network Review Methodology Paper, and to ensure an appropriate level of town centre uses come forward in this location. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/097	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce													[Design principles] § As noted earlier, whilst St William support the requirement for development to recognise the role of the gasholders as heritage and character assets and their potential contribution to place making. The site allocation must also acknowledge that a viable strategy for the reuse of the gasholders is needed to enable the retention and reuse of the gasholders as heritage and character assets. This is in line with the wording within the adopted site allocation and is particularly important in relation to gas holder no. 4 which is subject to enhanced listing. St William request that this is included within the development principles section.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Design Principles] Development should recognise the role of the Gasholders as heritage and character assets and their potential contribution to place making, particularly gasholder 4 due to its enhanced listing whilst finding a viable strategy for their reuse. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and Grade I House Mill as set out in the adopted Three Mills and Conservation Area Appraisal Management Guidelines.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/098	Neighbourhoods	N7 Three Mills	N7.SA2 Parcel for ce														[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Design Principles] ~~The design and layout of the site should minimise the impact of noise from the railway lines, bus infrastructure and Pressure Reduction System on residential amenity.~~	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The council considers this to be an important design principle that should not be removed from the site allocation. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/099	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Design principles] § Whilst the protection of SINC is wholly supported in principle, the unique circumstances of gasworks sites and the required remediation mean that impact on SINC is unavoidable. Significant remediation is required to enable the Bromley by Bow gasworks site to come forward for redevelopment and to make it publicly accessible. The mitigation hierarchy that is outlined within the London Plan should be applied in this instance and subject to following the mitigation hierarchy there should be acknowledgement that it may not always be possible to re-provide SINC in its current location for sites of this nature but compensatory SINC and/or biodiversity and ecological enhancements will be provided.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Design Principles] The layout of the site should protect the Site of Importance for Nature Conservation, including through the provision of a local park which should optimise existing green features by protecting and enhancing the condition of the Site of Importance for Nature Conservation, where feasible.	A change to this policy approach has not been made. We did not consider this change to be necessary as the SINC designation is justified by up to date evidence. 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 or 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: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. 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). Please note that Policy GWS3: Biodiversity, urban greening, and access to nature, part 6 sets out the mitigation hierarchy which should be applied to minimise development impact on Sites of Importance for Nature Conservation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/100	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Design principles] The desire to increase access to the waterways is supported but should be subject to technical considerations and feasibility. Providing access to the waterways may not always be possible owing to technical considerations and/or site constraints and wording such as ‘where possible’ should be included (suggested amendments to wording and polices are set out in Appendix 13). The aspiration for new bridges to help reduce the severance caused by the existing transport infrastructure within this neighbourhood will also be dependent on site ownership and delivery constraints and should also incorporate wording that states ‘where possible or feasible’. § The requirement to establish a connected network of streets and spaces that connect to the wider street network is supported in principle but it should be noted that achieving this will be subject to land ownership. In particular the requirement to connect through to Abbey Mills.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Design Principles] Development proposals should create stronger ecological connections to and along the Lea and Channelsea valleys and Mill Meads Site of Importance for Nature Conservation on the other side of the Channelsea River. The design and layout of the site should take into account the waterside setting and increase access to nature and the surrounding waterways, where technically feasible. The design and layout of the site should establish a connected network of streets and spaces that connects to the wider street network and should create a street hierarchy. Routes through and to and from the site should improve access an connectivity to West Ham Station, N7.SA1 Abbey Mills, the Twelvetrees Local Centre and the Manor Road neighbourhood where feasible. The layout of the site should enable the continuation of the Leaway Walk through the site along Crows Road and through to N7.SA1 Abbey Mills. Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6, particularly on Manor Road and the design and layout of the site take account of the underground cable routes. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.	A change to this policy approach has not been made. 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. The Strategy has informed our policy approach to the borough’s access to water and green spaces. Increasing public access to green and water spaces across the neighbourhood a key part of the neighbourhood vision. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GSWS2 and GWS3 which provide further detail on access to green space and access to and along the water. The extent to which improvements are made to public access to these spaces will be determined during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/101	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													13.9 Infrastructure requirements: § Development is expected to contribute to active and public transport upgrades, including access to, and capacity at, West Ham Station. St William supports the principle of encouraging sustainable and active modes of travel however it should be noted that significant contributions and commitments have already been made from TwelveTrees Park in particular including the delivery of three bridges.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] Infrastructure Requirements	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/102	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Infrastructure Requirements] § The requirement for a health centre that is a minimum of 1,500 sqm designed to meet NHS needs and standards doesn’t appear to reflect current NHS requirements for local health services. The text should be revised to only require a health centre where there is a need at the time of delivery. The site allocation should also make clear that the requirement for a new health centre should be within the local centre close to West Ham station.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Infrastructure requirements] Development should address open space deficiency by providing a consolidated local park with a minimum area of 2 hectares to service nearby residential neighbourhoods. The open space provision should prioritise community growing opportunities. ~~Development should provide a health centre of a minimum of 1,500 sqm, designed to meet NHS needs and standards.~~ Provision of health facilities should be subject to a needs based assessment at the time of delivery and meet the requirements of Local Plan Policy SI2 and delivered within the local centre close to West Ham station.	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 draft site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024). This work has identified the need for site allocation N7.SA2 to provide a health centre of a minimum of 1,500 sqm, designed to meet NHS needs and standards. The infrastructure requirements for this site allocation already state that the provision of health facilities should be subject to a needs based assessment at the time of delivery and meet the requirements of Local Plan Policy SI2. Additionally, the design principles for this site allocation states that the health centre should be located in proximity to the Twelvetrees Local Centre and in an accessible and prominent part of the site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/103	Neighbou rhoods	N7 Three Mills	N7.SA2 Parcelfor ce													[Infrastructure Requirements] § St William raises concern with the new requirement for an automated vacuum collection system on the TwelveTrees Park and Bromley by Bow gasworks site. As explained in comments to Policy W3, the reasons as to why an automated vacuum collection system is not feasible or deliverable with reference to site allocation N7.SA1 is due to both sites being already subject to either a planning permission (that has been implemented and under construction) or a resolution to grant meaning that it is not possible to retrofit an automated vacuum collection system. This would also not be practical or reasonable for a phased development of this scale.	[Appendix 13: N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments] [Infrastructure Requirements] ~~Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8~~	This wording change is not supported. We did not consider this change to be necessary as 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 scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																														
Reg19-E-198	Siraj Hafeji		Reg19-E-198/003	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills											No	No									No	The proposal from the landowner presents a feasible solution by offering sufficient space for all community members. However, the Key Route proposal within the Local Plan threatens to restrict the Mosque's size, worsening existing issues and hindering our ability to serve our congregation effectively. Maintaining the same size as the current facility would disregard the growth and needs of our worshippers, compelling many to look for alternative venues for their religious practices, which would undermine community cohesion. In a borough as diverse as Newham, it is crucial for our Local Plan to include infrastructure that acknowledges and supports this diversity. Failing to do so risks not only legal compliance but also neglects the essential needs of the community it is designed to serve.	By increasing the size of the proposed replacement facility, we can ensure that it accommodates all members of our congregation, particularly women and children, who are currently underserved. Such a modification would not only align with the principles of community inclusivity, a fundamental tenet of sustainable development, but it would also adhere to legal obligations under the Equality Act, promoting equality of opportunity for all community members. Furthermore, addressing the current inadequacies would help to nurture a more robust community spirit, directly contributing to the social cohesion and diversity that Newham prides itself on. Failure to consider these modifications risks perpetuating existing disparities and undermines the legal compliance and soundness of the Local Plan, making it essential that these changes are implemented.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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

LB Newham Response		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.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-199	Abid Hafeji		Reg19-E-199/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As a member of this community who uses the existing premises for my spiritual needs, I can attest that there is currently inadequate space and facilities to obtain maximum community benefit. The Local Plan as it currently stands is fundamentally unsound and fails to comply with the duty to co-operate, largely due to its inadequate provision for community facilities that do not meet the day-to-day requirements of our diverse population. The existing structures are woefully insufficient, lacking the necessary space to cater to all worshippers, especially women and children, which directly hampers participation and inclusivity within our community. Simply retaining the same size as the current facility will not rectify these deficiencies; it is essential that any proposed replacement ensures ample capacity reflective of our growing congregation's actual needs. The inadequacies of the present facility have already forced many worshippers to seek alternative venues for their religious practices, undermining community cohesion and spirit. [...]Furthermore, while Newham prides itself on its diversity, the current draft proposal neglects to incorporate diverse infrastructure that would support and enhance this rich community, as the landowner’s plan, with its careful consideration and inclusivity, enables retail shops and housing infrastructure alongside the Mosque to be built. It is imperative that the Local Plan be revised to responsibly address these shortcomings, fostering an environment where all members of our community can thrive in a way which takes onboard their concerns rather than neglecting them. I therefore urge you to take on the proposal drafted by the landowner as it considers the concerns of the wellbeing of the faith community.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-199	Abid Hafeji		Reg19-E-199/001a	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		To ensure the Local Plan is both legally compliant and sound, critical modifications are necessary, particularly regarding the inadequate existing facilities that fail to meet the diverse and evolving needs of our community. Our community is eager to forge partnerships with landowners and authorities to create a replacement facility that truly reflects our requirements, fostering collaboration that benefits all stakeholders. The current inflexible policy surrounding facility size must be reassessed through acomprehensive needs assessment to align with our community's dynamic demands, thereby enhancing inclusivity and participation, especially among women and children.	Comment noted. 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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-199	Abid Hafeji		Reg19-E-199/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No		Additionally, the lack of purpose-built facilities for individuals with disabilities highlights the necessity for inclusive design that facilitates social connections among our elderly population facing isolation. Furthermore, the draft proposal falls short in leveraging land for both much-needed housing and expansive community facilities, an oversight not seen in other progressive boroughs.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The Local Plan is applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 individuals with disabilities. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-199	Abid Hafeji		Reg19-E-199/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	I also completely object to the Local Plan's Key Route proposal as it will limit the size of the Mosque, hindering community participation in prayer and accessing community facilities, ultimately not addressing the concern of the limitations of the existing small facility.	We also urge the plan to address the proposed key transit routes, ensuring they align with the housing and economic growth potential essential for the area. In doing so, the plan will not only be legally compliant but will also foster a vibrant and diverse community, contribute to economic growth in the construction sector, and generate local employment opportunities, ultimately leading to a stronger, more cohesive Newham. Failure to consider these modifications risks perpetuating existing disparities and undermines the legal compliance and soundness of the Local Plan, making it essential that these changes are implemented. I urge you to therefore recognise faith policy in town planning by adopting the Landowner's proposal.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The Council is satisfied that the plan is sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
Reg19-E-201	Shakeel Ismail		Reg19-E-201/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-201	Shakeel Ismail		Reg19-E-201/001a	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								To make the Local Plan legally compliant and sound, the following modifications are necessary: Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-201	Shakeel Ismail		Reg19-E-201/001b	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Utilisation of Land for Economic and Housing Growth: The current draft does not maximise the land’s potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community’s needs but also contribute to local economic growth and job creation in the construction sector.	A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). Policy SI2 is relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. Furthermore, Policy D3 in the London Plan clearly states that “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”. The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-201	Shakeel Ismail		Reg19-E-201/001c	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No								Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-205	Fahim Hussain		Reg19-E-205/001d	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	This place has a lot of importance to me. I am a frequent visitor and it personally helps me with my well-being and mental health because I pray here often and find it peaceful. I request you do not initiate your planning to change this beautiful place. [originally put against Local Plan - taken forward against Policy N7 SA1]	I would really appreciate if the permission is given to the landlord to build the mosque as a place of worship and community services. Given the people attend the weekly and yearly religious events it’s imperative a mosque is allowed to build to serve the community for betterment.	Comment noted.
Reg19-E-228	Nida Hussain		Reg19-E-228/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No							No	This place has a lot of importance to me. I am a frequent visitor and it personally helps me with my well-being and mental health because I pray here often and find it peaceful. I request you do not initiate your planning to change this beautiful place.	I would really appreciate if the permission is given to the landlord to build the mosque as a place of worship and community services. Given the people attend the weekly and yearly religious events it’s imperative a mosque is allowed to build to serve the community for betterment.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-230	Aman Choudhary		Reg19-E-230/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	The current space is inadequate, reducing the space and facilities for women, not allowing them to express themselves fully. I implore you to create diversity as well as equality by allowing the space to be a community hub for he people in the area as well as a means of safety	I urge you to consider the needs of those in the community such as those with disabilities who have restricted access due to inadequate space by accepting the landowners inclusive proposal which is focussed on multipurpose usage including housing, shops as well as a diverse community mosque.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 disabled individuals of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Reg19-E-237	Abdullah Waza		Reg19-E-237/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			</

LB Newham Response		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.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-237	Abdullah Waza		Reg19-E-237/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													I also in the strongest terms oppose the Key Route proposal in the Local Plan, as it will restrict the Mosque's size, limiting community participation in prayer and access to community facilities, and failing to address the limitations of the existing small facility. Moreover, while Newham celebrates its diversity, the current draft proposal overlooks the essential infrastructure needed to support and enhance this vibrant community. In contrast, the landowner's plan thoughtfully incorporates retail shops and housing alongside the Mosque, promoting inclusivity.	We also call for the plan to address the proposed key transit routes, ensuring they support the housing and economic growth potential that is vital for the area. By doing so, the plan will not only comply with legal standards but will also cultivate a vibrant and diverse community, boost economic growth in the construction sector, and create local employment opportunities, ultimately leading to a stronger and more cohesive Newham.	A change to this policy approach has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-242	Faaiza Hafeji		Reg19-E-242/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	The proposal from the landowner presents a feasible solution by offering sufficient space for all community members. However, the Key Route proposal within the Local Plan threatens to restrict the Mosque's size, worsening existing issues and hindering our ability to serve our congregation effectively. Maintaining the same size as the current facility would disregard the growth and needs of our worshippers, compelling many to look for alternative venues for their religious practices, which would undermine community cohesion. In a borough as diverse as Newham, it is crucial for our Local Plan to include infrastructure that acknowledges and supports this diversity. Failing to do so risks not only legal compliance but also neglects the essential needs of the community it is designed to serve.	To meet the community aspirations and address the community concerns, please consult the Landowner who has carefully considered the wellbeing of the wider community through building retail shops, housing alongside a large enough Mosque enabling male and female usage.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 1 the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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 of the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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 remains sound without the proposed changes.
Reg19-E-245	Suleman Essa Patel		Reg19-E-245/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	We have been using this place for many years as for the prayers and for social gatherings and this place is very important for us.	I strongly recommend and appreciate if you grant permission to the land owners/ the stake holders of the land to build this place as a mosque and for housing purpose. We need council cooperation with us.	Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-E-246	Valli Patel		Reg19-E-246/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills						No	No					No	• The current facilities are insufficient and do not meet our community’s daily needs. The limitations of the existing structure hinder our ability to serve our members effectively. The space is too small to accommodate all worshippers, especially women and children, which limits participation and inclusivity within our community. • Any new facility must be appropriately sized to address the actual needs and demands of our community. Maintaining the same size as the current facility will not resolve existing shortcomings or accommodate the growing needs of our congregation. • The inadequacies of the current facility compel many worshippers to seek alternative locations for their religious practices. This situation undermines the development of a strong community spirit and affects the flow of people through our centers and mosques. • Despite Newham's diversity, the upcoming draft proposal does not adequately address the need for diverse infrastructure. • A new facility must be larger and better suited to accommodate a growing congregation. We strongly recommend conducting a needs assessment, as the existing policy falls short of meeting our requirements.	Our community is eager to collaborate with landowners and relevant authorities to develop a new facility that meets our needs. We believe that working together can yield a mutually beneficial outcome. • We want to emphasize the limitations of the current policy concerning facility size. We strongly advocate for a needs assessment, as the existing policy does not adequately reflect our community's evolving requirements. • There is a shortage of facilities specifically designed for individuals with disabilities, which would help socially isolated elderly individuals connect with others. The draft proposal does not fully leverage the land’s potential for essential housing and expanded community facilities, as seen in other areas of London and beyond. Additionally, privately-owned land has been acquired to meet future community needs.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					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.
Reg19-E-246	Valli Patel		Reg19-E-246/02	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	• Object everything on private land use policy including key route which will hinder future community development.	• The proposed site offers significant potential for driving economic growth in the construction sector and creating local job opportunities. However, the proposed key route has not been thoroughly assessed for its alignment with housing and economic growth potential.	Comment noted. 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.
Reg19-E-246	Valli Patel		Reg19-E-246/03	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No							• Work with the land owner and change local plan for purpose built Mosque and much needed Housing. • Work with land owner for solution who are working fir community interest	• Our community is enthusiastic about working with landowners and relevant authorities to develop a new facility that meets both our needs and those of the broader community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-EC-001	Mohammad Badruddoza		Reg19-EC-001/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	As an active member of this community who regularly utilises the existing facilities for my spiritual needs, I can attest to the fact that the current premises are inadequate in terms of both space and amenities. The limited capacity often results in overcrowding during gatherings, making it difficult to foster the kind of inclusive and serene environment that is essential for our spiritual practices. Furthermore, the lack of essential amenities, such as proper seating for women,, and designated areas for various activities, significantly hinders the community's ability to fully benefit from the space. These shortcomings restrict our ability to host larger events, accommodate diverse age groups and other demographics, and in creating an atmosphere conducive to personal reflection and collective growth. Expanding and improving the premises would greatly enhance the spiritual, social, and cultural experiences for all members of the community, ensuring that our needs are met more effectively	2. I want the suggestion of this official landowner to be accepted and looked at as soon as possible	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-EC-002	Mustaq Patel		Reg19-EC-002/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills													Newham is a borough that values diversity, however , it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.	I am not in favour with the proposal of New Han Council.	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-EC-002	Mustaq Patel		Reg19-EC-002/001	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working to gether can lead to a solution that benefits all parties involved. Additionally, we would like to address the inflexibility of the current policy regarding the size for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community.	I am not agree with this plan. There should be some alternative.	Comment noted. 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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-EC-003	Newham Muslim Forum		Reg19-EC-003/001	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													I would like to submit some feedback about site N7.SA1 in Three Mills. Currently part of the site is being used as a community space and the new Local Plan is proposing to allow development to replace the existing community floorspace with an equivalent amount of floorspace. While this is a good starting point, I wanted to point out that there is a great need for additional community facilities, especially with the huge amount of development taking place in the immediate vicinity of the area as well as borough wide. The current facilities on the N7.SA1 site are well used and get full multiple times a week and the current owners have been constrained by the current planning regulations from adding additional floorspace. Borough wide, we see the similar issues with new developments of housing not matched by the required additional floorspace for community use. (...) The most recent rejected planning applications from the current owners need to be revised understandably but the principle of allocating appropriate community floorspace for vast amounts of residential development must be maintained. Happy to discuss further.	My suggestion would be to dedicate a greater amount of floorspace for community use on the site N7.SA1.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-007	David Gilles		Reg19-E-007/037	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	Blan k						Blank	15 Neighbourhood Development Proposals P386 On N8 Stratford etc: N8 SA5 Partly Ex MSG Sphere site: The ex MSG Sphere site is part of N8 SA5. This should be made into a separate site allocation with its own development proposal/ mini feasibility study and described as suitable for non- family housing, employment and retail uses, in line with the Council resolution which stated: “To investigate possible future uses of the site of the now rejected MSG Sphere and in particular whether this site can be designated a Housing and Employment Inclusion Zone”		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/038	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way					Blank	Blan k						Blank	[15 Neighbourhood Development Proposals P386 On N8 Stratford etc:] The R19D does not include the paras in respect Rick Roberts Way and Pudding Mill which were both in the resolution agreed by full Council on the Plan. N8 SA7 P495 Rick Roberts Way: The Council resolution stated in respect of Rick Roberts Way and under Development Principles: Add to the Regulation 19 Draft Local Plan: “We will preserve the affordable housing requirements following the allocation of the site by the London Legacy Development Corporation under the portfolio approach with Stratford Waterfront and Pudding Mill.” [These texts do not appear to have been considered in the Consultation Report; the only reference to portfolio approaches is consideration of submissions from developers and the LLDC in relation to future portfolios. The text agreed by Council should therefore be included in the Plan.]		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H4 part 6 states how portfolio approaches to the delivery of family and affordable housing will be assessed. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-007	David Gilles		Reg19-E-007/039	Neighbours	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Blank	Blank							[15 Neighbourhood Development Proposals P386 On N8 Stratford etc: [...]The R19D does not include the paras in respect Rick Roberts Way and Pudding Mill which were both in the resolution agreed by full Council on the Plan.] N8 SA9 P499 Pudding Mill: The Council resolution stated in respect of Pudding Mill and under development principles: Add to the Regulation 19 Draft Local Plan “We will preserve the affordable housing requirements following the allocation of the site by the London Legacy Development Corporation under the portfolio approach with Stratford Waterfront and Rick Roberts Way. Accordingly it is anticipated that at least 50% of housing on the site will be genuinely affordable housing, in order to comply with overall affordable housing requirements under the unilateral undertaking, made by the London Legacy Development Corporation when developing Stratford Waterfront (now known as East Bank) with 0% low cost housing”. These texts do not appear to have been considered in the Consultation Report; the only reference to portfolio approaches is consideration of submissions from developers and the LLDC in relation to future portfolios. The text agreed by Council should therefore be included in the Plan.		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H4 part 6 states how portfolio approaches to the delivery of family and affordable housing will be assessed. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/083	Neighbours	N8 Stratford and Maryland														We note that although site N8.SA2 Infrastructure Requirements include: ‘Increased station and interchange capacity through improved circulation, new ticket hall and new station entrances’ there is no mention of development funding.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider that policy T1 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. 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.
Reg19-E-013	Transport for London		Reg19-E-013/084	Neighbours	N8 Stratford and Maryland														[‘Britain’s busiest station’ should be revised to ‘one of Britain’s busiest stations’ as this was a Covid impact and the 2021/22 figures are different] We note that this has been corrected in the N8 Neighbourhood Profile.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/085	Neighbours	N8 Stratford and Maryland														We welcome inclusion of the following in site N8.SA2 infrastructure requirements: ‘Land should be safeguarded for double tracking the DLR route.’		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/086	Neighbourhoods	N8 Stratford and Maryland														We note that the design principles for site N8.SA2 already includes the following: ‘Any redevelopment of Stratford bus station should retain the function of a consolidated bus station and meet TfL’s future requirements’. We welcome the following in the infrastructure requirements for site N8.SA5: ‘Retention of bus stations and interchange functions.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/087	Neighbourhoods	N8 Stratford and Maryland														[In the second paragraph of the vision the first sentence should be amended to read The distinct areas of the neighbourhood will be brought together into a place with strong sense of place and character and through safe, accessible and easy to navigate public transport, walking or cycling routes.] We welcome the addition of this wording.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/088	Neighbourhoods	N8 Stratford and Maryland														[Point 11 should be amended to read ‘increasing the capacity of Stratford station and preventing development which would inhibit future station and interchange improvements’] We welcome the addition of this wording.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/089	Neighbourhoods	N8 Stratford and Maryland														[Point 14 imposes a requirement for new and improved connections across the River Lea at Bow Goods Yard. Further explanation would be helpful; a new vehicular connection is required to reduce the traffic impact of any development on the N8.SA8 and SA9 sites. However, we note that Bow Goods Yard is not identified as a Site Allocation, despite the LLDC’s designation of this site. While both the continued function of the strategic rail freight facility and capacity of the Strategic Industrial Land should be safeguarded, improvements to and intensification of these functions could release land for development. Within this context, there is a need to co-ordinate both development and the new vehicular link with the Bow Goods Yard West site in Tower Hamlets.] We note that no changes have been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/090	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[In ‘Development principles’ (the last sentence of the first paragraph) the text should be amended to read ‘Any redevelopment of Stratford bus station should retain the function of a consolidated bus station and meet TfL’s future requirements.’] We welcome the addition of this wording.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/091	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[In ‘Design principles’ (fifth paragraph), the text should be amended to read ‘The design and layout of the redevelopment of Stratford bus station should locate bus stops in the open but consolidated in a single off-highway location to facilitate easy and efficient interchange away from the over station development. Bus stands can be located under over-station development, but access to daylight is essential in the facilities for TfL staff and bus drivers.’] We welcome the alteration of this wording as suggested although we note that the point about access to daylight is considered too detailed to include.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/092	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[In the penultimate paragraph of ‘Design principles,’ the text should be amended to read ‘The design and layout of the site should mitigate the impact of noise from the railway transport operational uses.’] We note that this has been amended to read ‘The design and layout of the site should mitigate the impact of noise from the railway and transport operational uses.’		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/093	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[In ‘Infrastructure requirements’, the following amendment should be made: ‘Increased station and interchange capacity through improved circulation, ticket hall and station entrances.’] We welcome the change in wording.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/094	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[In ‘Phasing and implementation’ the following amendment should be made: ‘No development can take place on the Network Rail maintenance depot, London Underground operational areas or bus infrastructure including bus stations until their function is re-provided or re-located in line with stakeholders’ requirements.’] We welcome the change in wording.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/095	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													The site allocation should consider the need for a flexible approach to facilitate the delivery of new development and a high quality public realm, in line with the local masterplan. Such an amendment would be reflective of the support contained within the London Plan for intensified development at areas of high public transport connectivity. The current approach risks focussing too heavily on delivery of specific elements such as green space.	We suggest broadening the designation to reflect the potential to deliver a wider range of public realm improvements, once more is known about site constraints.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/096	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													The proposed bridge and the green space and realm above the Jubilee line and also DLR Woolwich Branch line (platforms 13 to 17) may have significant design and construction challenges, with implications for station operating costs and future maintenance of rail infrastructure. The feasibility of any such proposals will need to be explored early in consultation with appropriate stakeholders from TfL and other organisations.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/097	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station						No								The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of visible and buried rail infrastructure should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection and Network Rail	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.
Reg19-E-013	Transport for London		Reg19-E-013/098	Neighbourhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District													[It should be clarified that the proposal for Jupp Road Bridge is for a walk bridge rather than a ‘primary vehicular route’.] We note that key routes and connections are now shown differently on the site allocation maps		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/099	Neighbourhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District													[In ‘Infrastructure requirements’ the following should be added: ‘Safeguard land for double tracking DLR route.’] We welcome the addition to the infrastructure requirements		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/100	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West													[he list of existing uses should be amended to read ‘Stratford International station, Westfield shopping centre, Stratford City bus station, Stratford International bus station, coach and taxi provision, vacant land, office, retail and leisure uses.’] We welcome the amended description of existing uses.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/101	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West													[In ‘Infrastructure requirements’ the following should be added: ‘Retention of bus stations and interchange functions.’] We welcome the addition of this wording		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/102	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West						No								We attach plans in appendix B showing locations of LU and DLR lines under and adjacent to boundaries of site, including LU pumping station at A within site and with right of access across site. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the London Underground and DLR assets below and above ground including the LU pump shaft and vehicular access thereto should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/103	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill													[The map should include a dotted line for Marshgate Lane bus/walk/cycle connection (it is included in LLDC’s Area Action Plan and in ‘Infrastructure requirements’).] We note that key routes and connections are now shown differently on the site allocations maps		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/104	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill						No								The northern boundary of this site includes land occupied by DLR tracks and an Elizabeth line substation. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the DLR and Elizabeth line assets and operations on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.
Reg19-E-013	Transport for London		Reg19-E-013/105	Neighbourhoods	N8 Stratford and Maryland	N8.SA10 Chobham Farm North						No								We attach a plan in appendix B showing the approximate location of Central line tunnels in immediate vicinity of and potentially partially under site as red dotted line. To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the Central line tunnel on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	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.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/002	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank						Blank	FGT has an interest in the Bingo Hall site at 341-351 High Street, Stratford (the “Site”) which has been in use as a Bingo Hall since 1993 and was refurbished in 2012 for its continued use as a Bingo Hall. These representations follow on from the representations previously submitted to LBN in relation to draft site allocation N8.SA4 of the Regulation 18 Draft Local Plan.		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/003	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					No	No						Blank	Executive Summary These representations demonstrate to LBN that: a. The current Site Allocation (ref: N8.SA4) found in Part 2 of the draft Local Plan is unviable and that LBN has a duty to ensure that any site allocation is deliverable otherwise the Local Plan will not need the tests set out in the NPPF		A change to this policy approach has not been made. Your comments regarding hotel use, the need for residential development and building heights are addressed separately. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. We note you have provided your initial viability assessment for your proposal for this site as part of your representation. This has already been subject to a pre-application process and it would be disproportionate for the Local Plan process to re-assess this level of detail. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/004	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank						Blank	[Executive Summary These representations demonstrate to LBN that:] b. The Site is in an area that is appropriate for a hotel-led, mixed-use scheme and is supported by strategic policy. It will also deliver more planning benefits than the current site allocation (ref: N8.SA4)		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/005	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank						Blank	[Executive Summary These representations demonstrate to LBN that:] c. LBH has not identified enough deliverable sites to meet the needs of hoteliers / visitors to Stratford’s Metropolitan Town Centre, contrary to London Plan policy. A hotel-led, mixed-use scheme on the Site would help to resolve this issue		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/006	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank						Blank	[Executive Summary These representations demonstrate to LBN that:] d. LBN no longer needs to allocate the Site for residential-led mixed-use purposes to meet its housing target, particularly considering the impending changes to the standard methodology which has seen LBH’s annual housing target fall by 48%		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/007	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank						Blank	[Executive Summary These representations demonstrate to LBN that:] e. LBN should allow buildings greater than 13-storeys on the southside of Stratford High Street, particularly on Site Allocation ref: N8.SA4 where there is clear evidence that: • A cluster of tall buildings are emerging in this location; and • The Site is in a highly-accessible location		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 positively prepared and justified. Whilst we acknowledge that consent have been granted to sites in the immediate context of the N8.SA4 Stratford High Street Bingo Hall site allocation, and that they could benefit from planning consents under the current Local Plan, those decisions are informed by the adopted LLDC 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, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum height and, due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street it is not considered appropriate to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster to the surrounding context. 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 is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/009	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank							FGT seeks LBN’s agreement to revise the draft policies discussed in these representations. One of these revisions specifically relates to draft Site Allocation (ref: N8.SA4). It seeks to insert the following additional text into the site allocation description: Hotel floorspace would be acceptable on this site on the basis that it falls into the Olympic Legacy Opportunity Area and the Elizabeth Line East growth area. However it must form part of a mixed-use scheme that includes employment and industrial floorspace and delivers other planning related benefits that help meet to primary objectives of Local Plan, such as the delivery of housing and local employment opportunities”.	“Hotel and residential development with employment floorspace. The employment floorspace should be consistent with Local Plan Policy J1 and should provide space for light industrial uses and business workspaces and complement the offer at Stratford Workshops on Burford Road. Hotel floorspace would be acceptable on this site on the basis that it falls into the Olympic Legacy Opportunity Area and the Elizabeth Line East growth area. However it must form part of a mixed-use scheme that includes employment and industrial floorspace and delivers other planning related benefits that help meet to primary objectives of Local Plan, such as the delivery of housing and local employment opportunities”.	A change to this policy approach has not been made. 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.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/009a	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	Blank								“Building heights should ranges between 9 and 21m (3-7 storeys) with taller buildings up to 40m (ca. ~~12-storeys~~ 16 to 20-storeys) in the north of the site and 32m (ca. 10-storeys) in the rest of the site”	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 positively prepared and justified. Whilst we acknowledge that consent have been granted to sites in the immediate context of the N8.SA4 Stratford High Street Bingo Hall site allocation, and that they could benefit from planning consents under the current LLDC Local Plan, those decisions are informed by the adopted LLDC 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, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum height and due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street is not considered appropriate to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster to the surrounding context. 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 is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/104	Neighbou rhoods	N8 Stratford and Maryland	N8.SA1 Stratford Central					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/105	Neighbou rhoods	N8 Stratford and Maryland	N8.SA1 Stratford Central					Blank	No						Blank	[Waste Response] The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/106	Neighbourhoods	N8 Stratford and Maryland	N8.SA1 Stratford Central					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/107	Neighbourhoods	N8 Stratford and Maryland	N8.SA10 Chobham Farm North					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/108	Neighbourhoods	N8 Stratford and Maryland	N8.SA10 Chobham Farm North					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/109	Neighbou rhoods	N8 Stratford and Maryland	N8.SA10 Chobham Farm North					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/110	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/111	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No						Blank	[Waste Response] The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/112	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/113	Neighbou rhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/114	Neighbou rhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N8.SA3 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/115	Neighbourhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/116	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/117	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/118	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/119	Neighbourhoods	N8 Stratford and Maryland	N8.SA6 Stratford Waterfront South					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/120	Neighbourhoods	N8 Stratford and Maryland	N8.SA6 Stratford Waterfront South					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/121	Neighbourhoods	N8 Stratford and Maryland	N8.SA6 Stratford Waterfront South					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/122	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/123	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/124	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-033	Thames Water		Reg19-E-033/125	Neighbourhoods	N8 Stratford and Maryland	N8.SA8 Bridgewater Road					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/126	Neighbourhoods	N8 Stratford and Maryland	N8.SA8 Bridgewater Road					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/127	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council’s response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/128	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/129	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/130	Neighbou rhoods	N8 Stratford and Maryland	N9.SA1 Plaistow North					Blank	No						Blank	[Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.
Reg19-E-033	Thames Water		Reg19-E-033/135	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[WESTFIELD STRATFORD CITY, MONTIFCHET ROAD, LONDON (PENDING) *SPZ ZONE 2*] [Water Response] The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to add requirement in phasing and implementation in relevant site allocations to take account of likely requirement for water supply and/or wastewater infrastructure upgrade through early engagement with Thames Water. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/136	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[WESTFIELD STRATFORD CITY, MONTIFCHET ROAD, LONDON (PENDING) *SPZ ZONE 2*] [Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. The Local Plan requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 and the phasing and implementation section of relevant site allocations. However, the Council recognises the importance of ensuring the site allocation reflects the latest utility capacity condition and has therefore made the following wording change: N8.SA5 Phasing and Implementation: Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. which is included in the modification table.
Reg19-E-033	Thames Water		Reg19-E-033/137	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[WESTFIELD STRATFORD CITY, MONTIFCHET ROAD, LONDON (PENDING) *SPZ ZONE 2*] [Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/016	Neighbou rhoods	N8 Stratford and Maryland			N8.1			Blank	Blank						Blank	Policy N8 – Stratford and Maryland and Site Allocation N8.SA2 Stratford Station Parts 1 and Site Allocations 1. supporting a moderate uplift in density in ‘enhance’ areas where development enhances the character of the neighbourhood and consolidates the urban form; Unite make the following comments on Part 1 of Policy N8 and the site allocations in general: 1. Part 1 of the Policy should acknowledge that the Stratford and Mayland area is a highly sustainable and accessible location for high density developments due to the extensive transport links and facilities within the area. As a result, the word moderate should not be used with regards to the potential density of the area.	On the basis of the above comments, Unite make the following recommendations to allow for optimal development: • Removal of the reference to ‘moderate’ in Part 1 of the Policy.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, part of the neighbourhood is classified as enhance area and part as transform. The Council considers that the vision for N8 Stratford and Maryland supports an appropriate balance between a moderate uplift of enhance areas [N8.1] and the transformation of identified site allocations [N8.2], which have already taken into account the high level of accessibility of the sites and their contribution to the growth of the neighbourhood. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/017	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blank						Blank	[Policy N8 – Stratford and Maryland and Site Allocation N8.SA2 Stratford Station Parts 1 and Site Allocations 1. supporting a moderate uplift in density in ‘enhance’ areas where development enhances the character of the neighbourhood and consolidates the urban form; Unite make the following comments on Part 1 of Policy N8 and the site allocations in general:] 2. Referring back to Unite’s comments on Policy D4 (Tall Buildings) above, the site allocations similarly include prescribed height ranges. Whilst Unite encourage the identification of areas suitable for tall buildings, greater flexibility should be added to the wording of these allocations to allow for tall buildings outside of specified zones and buildings of varying heights outside the prescribed ranges where it has been demonstrated through the supporting reports that this would be acceptable for the site’s location.	[On the basis of the above comments, Unite make the following recommendations to allow for optimal development:] • Remove the prescribed height limits/ranges to allow for greater flexibility on a site-by-site basis.	A change to this policy approach has not been made. Your comments regarding policy D4 are addressed separately. In relation to site allocation design principles, we did not consider this change to be appropriate as removing maximum height parameters will undermine the delivery of policy D4. The Council considers the policy in line with policy D4 and 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/018	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blank						Blank	[Policy N8 – Stratford and Maryland and Site Allocation N8.SA2 Stratford Station Parts 1 and Site Allocations 1. supporting a moderate uplift in density in ‘enhance’ areas where development enhances the character of the neighbourhood and consolidates the urban form; Unite make the following comments on Part 1 of Policy N8 and the site allocations in general:] 3. Due to the area’s sustainable and accessible location, PBSA should also be added to the site allocation as a potential suitable use for the area providing it meets other policy requirements and that this is demonstrated through supporting reports.	[On the basis of the above comments, Unite make the following recommendations to allow for optimal development:] • Include PBSA as a potential suitable use in the Stratford and Maryland site allocations.	A change to this policy approach has not been made. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/015	Neighbou rhoods	N8 Stratford and Maryland						No	No						Blank	4 Draft Local Plan (Part 2) - Representations C Pages 468 to 470 – N8 Stratford and Maryland (Vision) Objection: - Contrary to the objectives of Policy E10 and paragraph 6.10.02 of the London Plan - Contrary to paragraph 35 (a) – positively prepared – of the NPPF Amendments required: Yes, as suggested below. 4.1 Please refer to the background context in Section 2 above. [refer to Section 2 Background Context at p. 4 of original representation] 4.2 In light of the context, THESET LTD conclude that draft ‘Vision’ for the Stratford and Maryland area, as set out on pages 468 to 470 of the Draft Submission Local Plan (Regulation 19) June 2024: - Does not accord with Policy E10 of the London Plan; nor - Does not meet the ‘positively prepared’ test set out in paragraph 35 of the NPPF.	THESET LTD’s Suggested Amendments: 4.3 THESET LTD seeks LBN’s agreement to revise draft Vision by adding a new bullet point, as follows, to ensure it is consistent with Policy E10 of the London Plan: “The vision for Stratford and Maryland will be achieved by: 15. supporting hotel development within centres in Stratford and Maryland Neighbourhood as a key tourist destination or parts of Opportunity Areas where they are well-connected by public transport.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough, in a way which aligns with the NPPF and the London Plan on supporting the local visitor economy, while also balancing other needs, particularly for housing, as stated in the justification section of policy HS8. 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.
Reg19-E-063	University of East London	DP9	Reg19-E-063/009	Neighbou rhoods	N8 Stratford and Maryland						Blank	Blan k						Blank	Neighbourhoods - N8 – Stratford and Maryland Neighbourhood N8 in the Draft Plan sets out the neighbourhood boundary for Stratford and Maryland. It should first be noted that the boundary dissects the existing UEL Stratford Campus at Water Lane, effectively positioning University House into a separate neighbourhood area and its associated vision. UEL commented at Regulation 18 stage that the boundary of Neighbourhood N8 should be amended to include the entirety of the UEL Stratford Campus to ensure consistency in how the area vision is applied across the Stratford Campus and would wish to reiterate this request.		An amend to the neighbourhood boundary was made in light of the comment you submitted 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 encompassed the Stratford Campus. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-063	University of East London	DP9	Reg19-E-063/010	Neighbourhoods	N8 Stratford and Maryland						Blank	Blank						Blank	[Neighbourhoods - N8 – Stratford and Maryland] Our client has also raised some concern that the proposals for the redevelopment of the UEL Stratford Campus would represent one of the only major development schemes with the proximity of the new Elizabeth Line station at Maryland, unlike the surrounding areas of the majority of other Elizabeth Line stations which have seen expansive development growth, reflecting their increased accessibility and connectivity resulting from proximity to the new Elizabeth Line. Our client considers that development opportunities within Neighbourhood N8, should be recognised in the Draft Plan, potentially through the allocation of additional appropriate sites within the N8 boundary.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-063	University of East London	DP9	Reg19-E-063/011	Neighbourhoods	N8 Stratford and Maryland						Blank	Blank						Blank	[Neighbourhoods - N8 – Stratford and Maryland] At the heart of Stratford East is the Stratford Youth Zone (Theatre Square, Salway Place, Stratford). The Stratford Youth Zone aligns directly with the strategic growth and diversification of UEL’s School of Arts & Creative Industries (ACI). Using connections back into the cultural sector, the aim of the School of ACI will be to work closely with the Youth Empowerment Service to develop and deliver meaningful creative opportunities for young people as well as develop the culture of the building, ensuring young people are at the heart of everything at the Youth Zone. UEL would wish to reaffirm its commitment to the Stratford Cultural Quarter and therefore reiterate its suggestion made at Regulation 18 consultation that the vision for Neighbourhood N8 is amended to set out the importance of reinvigorating the immediate area, focusing on measures to attract footfall and discourage anti-social behaviour.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-065	Stratford Original BID		Reg19-E-065/002	Social Infrastructure	N8 Stratford and Maryland						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Maintaining and strengthening the character of Stratford Cultural Quarter, which is located around Theatre Square. We want to ensure that cultural land uses are secured, for instance the cinema.		Comment noted.
Reg19-E-065	Stratford Original BID		Reg19-E-065/011	Neighbourhoods	N8 Stratford and Maryland	N8.SA1 Stratford Central					Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - The re-use of Morgan House for workspace should be explored.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/037	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	We welcome the reference to appropriate commercial uses in Policy J, which will allow research and development (Class E(g)(ii)) within the Metropolitan Centre and support the general principles of the allocation.		Support noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/038	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	We generally support the references to residential, office and other town centre uses at International Quarter South (now Stratford Cross) but encourage the allocation to also reference other appropriate uses, such as leisure and education to support the functions on the centre.		Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N8.SA5 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), nor has it been identified as being required to meet the need for a sport or recreation use, as evidenced in Newham’s Playing Pitch Strategy and Build Needs Assessment. It should be noted that this would not preclude an applicant from making the case for such facilities 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 SI3 and SI4 would need to be met. The Council is satisfied that the plan remains sound without the proposed changes

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/039	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[We generally support the references to residential, office and other town centre uses at International Quarter South (now Stratford Cross) but encourage the allocation to also reference other appropriate uses, such as leisure and education to support the functions on the centre.] However, our main concerns remain about the inconsistency between the existing and consented building heights at Stratford Cross and the proposed TBZ's as explained in our response to Policy D4 in relation to Building S8 and S10.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to extend the 100m zone to continue the consolidated clusters around IQL South and Cherry Park in line with the spatial hierarchy and objectives of the new local plan. The Council's response has not changed.
Reg19-E-092	SCBD Ltd	Quod	Reg19-E-092/002	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Yes						Blank	The proposed land uses for the site allocation, including residential, employment uses (including office and R&D), main town centre uses and social infrastructure including, community facilities and education facilities are supported and all would be appropriate on the Site. The range of uses will allow a flexible response to markets and help ensure the development of the allocation is optimised to support the associated enhancements to Stratford Station.		Support noted.
Reg19-E-092	SCBD Ltd	Quod	Reg19-E-092/003	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Yes						Blank	The Site is located adjacent to the Metropolitan Centre and adjacent to Stratford Station and is highly accessible and a location where London Plan D3 'Optimising site capacity through the design-led approach' Part B where higher density developments should be promoted. The Site is currently proposed within the 60m Tall Building Zone TBZ. However, its location between the 110m AoD building to the north in Stratford Cross and the 100m TBZ around the station to the northeast provides the opportunity to improve legibility of the new proposed link over the railway corridor and access to Stratford Station through a taller building up to 100m on the Site. Furthermore, the Site has to address many site constraints, including the existing ground level set below the Montfichet Road level, railway on all three boundaries and the need to integrate with the new proposed bridge structure over the railway set out in the draft Site Allocation. All of which will add challenges to the viable delivery of the Site and necessitate the optimisation of the development and height to help achieve the wider aims of the Site Allocation in supporting the enhancements to Stratford Station.	Therefore, we recommend that the Site is included within the 100m TBZ, to help improve the legibility of the Metropolitan Centre and new proposed links to Stratford High Street and also to optimise the Site capacity to support the overall station project.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/002	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill													Current Policy Position As set out above, our client’s sites fall within the planning jurisdiction of the LLDC, formally the Olympic Delivery Authority (ODA). The ODA was formed in April 2012 as part of the London 2012 Olympic Games bid. The aim of the ODA was to transform one of the most challenged areas in the UK into a sustainable, thriving neighbourhood. Once the Games concluded, the authority was renamed the LLDC and in 2020 the Legacy’s Corporation Board agreed that LLDC’s town planning powers and functions would return to the four neighbouring boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest by the end of 2024. The sites are allocated in the LLDC’s Local Plan (2020). The adopted Local Plan identifies Pudding Mill as a development site (Site Allocation SA4.3: Pudding Mill) which is envisioned as: “A new medium-density, mixed-use area, including a significant and diverse element of new and replacement business floorspace, including spaces suitable for small- and medium-sized businesses; a new Local Centre adjacent to Pudding Mill Lane DLR Station and Pudding Mill Lane; new homes including a significant element of family housing; new Local Open Space, playspace and public realm. Cumulatively across the Pudding Mill Site Allocation, 25 per cent non-residential floorspace should be achieved, with a predominantly industrial floorspace use mix in the area to the west of Cooks Road and around the Crossrail portal.” The allocation sets out key guidance as follows: • non-residential uses should be focused along a new central east-west street (which City Mill Passage will form part of); • development should allow for improved east-west connections through the site; • provision should be made for key connections, including a new bus/cycle/ pedestrian connection from Stratford High Street to Marshgate Lane and a new pedestrian/cycle connection from Wrexham Road over the A12 and River Lea; • land should be safeguarded for DLR North Route Double Tracking phase 2; and • regard will need to be had to not prejudicing the operation of the safeguarded rail freight site to the west. In the interest of consistency and clarity for developers (many of whom already own or have contractual positions on the site), the emerging policy within the Newham Local Plan should align with the key aspirations of the existing policy. However there are opportunities to update the vision to make it less prescriptive to allow design innovation and the delivery of development which meets need in successfully designed places.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/004	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Yes	No						Yes	2. Draft Allocation – N8.SA9 (Page 501-504) It is acknowledged that Bellway’s sites are located within the Stratford and Maryland ‘neighbourhood’ (N8) and covered by Site Allocation N8.SA9 – Pudding Mill within the draft Local Plan. The boundary of the proposed Site Allocation N8.SA9 is		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. The Draft Local Plan reflects an accurate position and supersedes the Regulation 18 document. The Council is satisfied that the plan is sound without the proposed changes.

understood to align with the existing Site Allocation SA4.3: Pudding Mill within the LLDC Local Plan (2020).
The updated draft allocation no longer outlines the planning history as described in the previous draft document, for the site shown below. However, the planning history within that document did not provide an accurate reflection of the current position, and should have been updated. It is suggested that the site address for each application be included within the descriptions below in the interest of clarity. The following amendments and additions were proposed by Savills in response to the Regulation 18 consultation last year, and we have updated accordingly where relevant:
“21/00395/FUL: Demolition of existing buildings and structures and redevelopment of the site to provide buildings ranging from six to nine storeys in height, comprising of 196 residential units including affordable housing (Use Class C3), 2,258 sqm GIA floorspace to accommodate commercial, business and service (Use Class E), together with associated car parking, open space, hard and soft landscaping and infrastructure work.”
~~Pending consideration – Permission~~
Granted - 28 November 2022.
21/00455/FUL: Planning application for demolition of existing buildings, and the erection of eight buildings ranging from 3 to 12 storeys in height, comprising a total of 254 residential dwellings and 4,257 sqm GIA of B1 (business) floorspace, together with basement, access, servicing, car parking, cycle parking, cycle storage, plant, open space and landscaping. **Permission Granted – 3 November 2022.**
21/00460/FUL: Application for outline permission (all matters reserved) for the erection of 6- buildings ranging between six (6) to fourteen (14) storeys in height to provide: 238 residential homes, including affordable housing (Use Class C3), and flexible commercial floorspace (Use Class E), together with associated blue badge car and cycle parking, public open spaces, landscaping and infrastructure works; and Detailed application for full planning permission for the demolition of the existing buildings and the erection of one building, extending to eight (8) and nine (9) storeys in height, to provide 105 residential homes (Use Class C3) and flexible commercial floorspace (Use Class E), together with associated car and cycle parking, public open space, landscaping, public realm improvements and infrastructure works. Resolution to grant planning permission secured 4 June 2024.
22/00384/FUL: Application for full planning permission for the redevelopment of the site to provide 496 residential units (Use Class C3), 8,752 sqm (GIA) OF storage and distribution/light industrial (Use Classes B8 and E(g)(iii)) and 184 sqm (GIA) OF retail floorspace (Use Class E (a-c)), with car and cycle parking and associated hard and soft landscaping. This application is

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations (2017). Withdrawn – 9 February 2024.		
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/005	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Yes	No						Yes	Development Principles The proposed development principles are broadly welcomed, and it is noted that Bellway’s Legacy Wharf schemes align with these.	The text on p.503 makes reference to providing evidence that the maximum throughput of the Barbers Road waste site has been re-provided elsewhere in London before the redevelopment of the site can take place. This evidence has been provided as part of Bellway’s Legacy Wharf Phase 3 proposals, which secured a resolution to grant planning permission at Planning Committee in June 2024. It is expected that the S106 negotiations will be concluded and planning permission granted prior to adoption of LBN’s draft Local Plan, so would recommend that this commentary is updated accordingly.	Comment noted.
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/006	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Yes	No						Yes	Design Principles The draft allocation still states that the site should be designed and developed in accordance with Local Plan Policy BFN2. [Policy BFN2 requires all applications on site allocations to undertake co-designed site masterplanning. This is an onerous requirement and should not be a prerequisite that could stifle development coming forward in a timely manner. We previously commented on this in our Regulation 18 consultation representations.]		As stated at Regulation 18. A change to this policy approach has not been made. We did not consider this change to be appropriate as masterplans are an important tool and is a current Local Plan requirement 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. It is a key requirement for site allocations to ensure the coordination of the development and design principles as well as infrastructure requirements. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/008	Building a Fairer Newham	N8 Stratford and Maryland	N8.SA9 Pudding Mill						Yes	No					Yes	Building Heights The draft submission allocation notes that “building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys). Looking at the immediate context of the site, there is significant variance in heights in the surrounding area. Of particular note is Sky View Tower which reaches 35 storeys. The Pudding Mill island site is a largely vacant, post-industrial island which benefits greatly from strategic connections and access to riverside amenity. The site is also allocated as falling within Tall Building Zone TBZ18 Stratford High Street under Policy D4 which allocates the site as being capable of accommodating taller buildings. The emerging context across the wider island includes permissions ranging from 8 to 23 storeys, including land at PDZ8 to the east (up to 25 storeys) and the neighbouring Vulcan Wharf site (up to 14 storeys). The site allocation acknowledges the range of potential PTAL ratings across the wider island being up to 6 (the highest possible rating). The policy therefore feels like a missed opportunity to maximise the development potential of sites where no harm which cannot be mitigated for can be demonstrated. There are no listed or locally listed buildings within the vicinity of the Pudding Mill island site (as indicated by the map provided on p.502 of the draft Local Plan). Furthermore, in accordance with paragraph 124 of the NPPF, the use of brownfield land should be optimised to make an effective use of land in meeting the needs for homes. This is a key brownfield area, which is largely uncompromised and offers a significant opportunity for much needed housing, therefore height should not be capped at 16 storeys. Bellway believes that the site has the capacity to accommodate greater height, along primary vehicular routes in particular, where there would be no negative impact on residential amenity or the surrounding land, for example over the railway line. This will allow the site to assimilate with the existing nearby context to the south on Stratford High Street. The following amendment (put forwards within our Regulation 18 consultation representations) is still proposed: “Building heights could extend up to 20 storeys.” The original proposal for Phase 3 (21/00460/FUL) included up to 411 residential units in buildings ranging between eight (8) to 23-storeys, but was reduced to 343 units due to comments from LLDC officers expressing concern with the proposed heights. Therefore, an amendment to building height restrictions for Site Allocation N8.SA9 could tangibly increase the delivery of homes and affordable homes in this location.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/002	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West						Blank	No					Blank	East Village is the flagship neighbourhood of GL’s growing portfolio and has helped revolutionise the BtR market in the UK, providing high quality, well managed neighbourhoods. East Village comprises a large proportion of Zones 3-6 of the of the Stratford City Outline Planning Permission (“SC OPP”) (ref: 10/90641/EXTODA) and		Comment noted.

represents the first phase of Olympic legacy development. The development of Zones 3-6 originally focussed on the delivery of accommodation to facilitate the Athletes’ Village during the 2012 Olympic and Paralympic Games (“the 2012 Games”) before being retrofitted to what is now known as the thriving East Village neighbourhood. A plan showing East Village is provided at Appendix 1 to these representations.

Launched in 2013, East Village is now the largest residential rental scheme in the UK with 2,445 homes for rent and a further 1,352 in the pipeline. GL also continues to partner with affordable tenure provider Triathlon Homes, which offers a further 1,379 homes (social rent and intermediate), and collectively have delivered a thriving mixed-tenure and tenure-blind community of more than 6,500 people. East Village provides a choice of buying or renting to people with a range of income level and provides 30% affordable homes across the neighbourhood as a whole. When complete, East Village will provide around 5,224 homes alongside 140,000 sq.ft of complementary non-residential floorspace.

Spanning 67 acres, including 25 acres of mature parkland, new parks and open space, East Village is also home to over 35 (primarily) independent, retailers from cafés and restaurants to dry cleaners and a beauty salon, as well as an Ofsted “Outstanding” education campus (Chobham Academy) and, the Sir Ludwig Guttmann Health & Wellbeing Centre – one of the NHS’s largest non-hospital buildings. This is in addition to all the world-class sporting facilities of Queen Elizabeth Olympic Park (“QEOP”) on its doorstep.

The East Village community continues to grow, also supported by resident initiatives like the E20 Football Foundation and Get Living-backed programmes and events. The community space “The Hall” by the East Village Trust became a hub for community support, with the establishment of a “Community Pantry”.

The majority of East Village has been built out and occupied apart from two remaining Plots (Plots N18/N19 and N16). These benefit from permission for residential and student accommodation uses (refs: 23/00090/REM and 23/00101/FUL respectively, approved in April 2024). An application for improvements to the surrounding public realm was also approved alongside these applications (Ref. 23/00091/FUL).

These permissions are yet to be implemented but the importance of preserving the principles established by those principles should not be underestimated.

East Village is a managed estate and therefore GL have a long-term interest in the creating and sustaining a successful community. Subsequently, these

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			representations are focussed around ensuring the emerging policy is consistent with existing consents across East Village and the longterm interest in the successful growth of the community and neighbourhood as a whole. It is important to recognise that key planning parameters and principles have already been established (by the SC OPP and other applications), and in many cases implemented. It is crucial therefore that any Local Plan covering East Village to both reflect agreed principles, but also not introduce any impediment that may undermine those principles, which in turn could also impact on development capacity (including housing). Representations are provided in Appendix 2.		
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/027	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[Appendix 2 - Representations] Part 2 GL support the vision for Site Allocation N8.SA5 provided that the above suggested changes to Policy D4 are taken as specific reference is made to the East Village Tall Building Zone under Part 2.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy has been misinterpreted because N8.2 sets the vision for the Stratford and Maryland Neighbourhood in its entirety. Detailed development and design principles are provided in each site allocation. As illustrated in the policy map, TBZ20: Chobham Manor / East Village includes the land between Leyton Road and the railway. The built element of East Village is not included in the N8.SA5 Stratford Town Centre West, not in the TBZ19: Stratford Central. Your comments regarding policy D4 are addressed separately. In relation to the request to include East Village neighbourhood within the TBZ19: Stratford Central designation, the information you have provided have been considered, however the conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, East Village is not considered an appropriate location for increasing height on existing buildings. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition from the higher cluster of TBZ19: Stratford Central to the surrounding context. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/028	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	No						Blank	[Appendix 2 - Representations Part 2] GL welcome Part 5 which seeks to maintain the role East Village Local Centre as a location for small scale independent retail complementary to that of Stratford, by supporting a diverse mix of uses to serve the local catchment needs for retail, services, leisure and community uses and contribute to maintaining high quality public realm.		Support noted.

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

Reg19-E-102	Network Rail		Reg19-E-102/005	Neighbourhoods	N8 Stratford and Maryland		Vision														[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR's feedback on these matters.] Appendix 1: Network Rail's feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills Current Regulation 19 wording 11. improving conditions for walking, cycling and public transport by: a. increasing the capacity of Stratford Station and preventing development which would inhibit future station and interchange c. reducing the severance of the train tracks through new connections and bridges across the neighbourhood at N8.SA2 Stratford Station, N8.SA8 Bridgewater Road and N8.SA9 Pudding Mill; d. requiring and supporting new and improved connections across the River Lea at Bows Good Yard and to the A12 and supporting f. requiring and supporting improved walking routes within, and linking to, the town centre and improved crossings, particularly on Broadway, Great Eastern Street, West Ham Lane, Romford Road, The Grove, Bridge Road, Stratford High Street and Angel Lane; and g. improving existing access points and creating new access points to the Greenway and supporting improvements to the Lee Navigation towpath. Proposed wording 11 c. Exploring design options for reducing the severance of the train tracks through new connections and bridges across the neighbourhood at N8.SA2 Stratford Station, N8.SA8 Bridgewater Road and N8.SA9 Pudding Mill; Network Rail Rationale NR is currently working with TFL, LLDC and the London Borough of Newham in relation to the Stratford Station Long term redevelopment project. The project is exploring opportunities to make improvements to Stratford Station and overcome existing and future, accessibility, congestion, capacity and wider connectivity issues. As part of this project, high-level design options for Stratford Station and the associated public realm are currently being explored to establish the feasibility of potential new connections and bridges	This wording change is not supported. We did not consider this change to be necessary as the Council considers that reducing severance of railway tracks in Stratford is a key vision of the neighbourhood policy. The Council is satisfied that the plan is sound without the proposed changes.

	LB Newham Response	
Proposed modifications and explanation	across railway infrastructure. Given the early stage of this design workstream, it is felt that the proposed wording for Part 11, c. should be slightly amended to reflect the current approach.	
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-102	Network Rail		Reg19-E-102/006	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blank						Blank		[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.] [Appendix 1: Network Rail’s feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Current Regulation 19 Wording 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 along with residential, employment uses, main town centre uses and social infrastructure including, community facilities and education facilities, and open space. Proposed wording Increased capacity at Stratford Station to be explored through the redevelopment of the ticket hall and a new and improved station entrances from Montfichet Road. The development of ‘Stratford Station as an area’ will seek to provide residential, employment uses, main town centre uses and social infrastructure including, community facilities and education facilities, and open space. Netowrk Rail Rationale This development principle is currently convoluted and needs more clarity. The text needs to be clear when referring to ‘Stratford Station as an area’ and ‘Stratford Station as the railway station’. The Carpenters Estate entrance has already been provided, so this confuses the tense this is written in, and therefore NR would suggest its removal.	The Council notes the proposed modification. This is not considered necessary for soundness. However the Council understands the reasons for the proposal and considers the proposed change providers further clarity. However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change: '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. ~~along with,~~ The development of the site allocation will provide residential, employment uses, main town centre uses and social infrastructure including community facilities and education facilities, and open space' - which is included in the modification table.

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

[illegible]

LB Newham Response																	
Proposed modifications and explanation																	consider the local context and townscape. The current approach would fail the soundness test and has the potential to impede the deliverability of development within the site.
Representor Comment																	
Complies with Duty to Cooperate?																	
Consistent with the London Plan?																	
Consistent with the NPPF?																	
Effective?																	
Justified?																	
Positively prepared?																	
Sound?																	
Legally Compliant?																	
Implementation text																	
Justification																	
Clause																	
Introduction																	
Site allocation																	
Policy																	
Chapter																	
Comment Reference																	
Agent																	
Representor																	
Representation Reference																	

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-102	Network Rail		Reg19-E-102/008	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blank						Blank	
[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.] [Appendix 1: Network Rail’s feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Current Regulation 19 Wording The design and layout of the site should create new and improved public realm and walking and cycling routes, including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new decked street south of the station towards the Stratford High Street and a new bridge from the station square to Montfichet Road and a new or improved Jupp Road Bridge for walking and cycling. Proposed wording The design and layout of the site should seek to create new and improved public realm and walking and cycling routes, including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new decked street south of the station towards the Stratford High Street which improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic Park. Network Rail Rationale The current site allocation is too rigid and restrictive. The allocation requires greater flexibility at this early stage in order to ensure that the Stratford Station long term redevelopment project can be successfully delivered. Whilst NR acknowledges that the allocation should seek to create new and improved public realm, together with enhanced walking and cycle routes, it is important that unrealistic expectations are not set at this stage and that there is sufficient flexibility within the allocation to enable a range of options to be explored. The local plan should be mindful of the ongoing Stratford Station redevelopment feasibility work, and that allocation does not constrain certain plots of land within A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is positively planned and effective. 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 wording of the site allocation would not preclude routes that improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic park. The council is keen to continue to collaborate with parties in bringing forward the Stratford Station redevelopment. The council is satisfied that the plan remains sound without the proposed changes.																			

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				the site which may be needed to help support and fund Stratford Station's redevelopment.	
Reg19-E-102	Network Rail		Reg19-E-102/009	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blank						Blank		[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR's feedback on these matters.] [Appendix 1: Network Rail's feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Proposed wording (Additional text) The potential constraint of visible and buried rail infrastructure should be taken into account at the preapplication stage through early engagement with Transport for London Infrastructure Protection and Network Rail.' Network Rail Rationale The site allocation contains a significant amount of visible and buried rail infrastructure assets. The proposed text will help to ensure rail infrastructure is considered at an early stage of the development and planning application process.	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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-102	Network Rail		Reg19-E-102/010	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	Blan k						Blank	[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR's feedback on these matters.] [Appendix 1: Network Rail's feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Network Rail Rationale The site allocation map for N8.SA2 should be reviewed and amended. The proposed areas of 'Opportunities for green space' within the allocation may restrict the potential use of land as 'staging' areas required for the delivery of station improvements. It may also limit and restrict potential development plots coming forward that have the ability to generate revenue to fund the station improvements and/or deliver station improvement as part of the development. (As exemplified by the provision of a new station entrance as part of Unite development on Land Adjacent to Meridian Steps, Angel Lane, Stratford City (Application ref. 22/00178/FUL)). Instead, the site allocation map should consider the need for a flexible approach to facilitate the delivery of new development and a high-quality public realm, in line with the local masterplan.	The 'Opportunities for green space' should be re-labelled as 'Opportunities for Public Realm/Development'.	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for a pocket park or a series of pocket parks as part of the new public space, play and community growing space has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. Increasing public access to green space across the neighbourhood a key part of the N8 Stratford and Maryland neighbourhood vision. 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. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GSWS2 and GWS3. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-E-102	Network Rail		Reg19-E-102/011	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					Blank	Blan k						Blank	[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.] [Appendix 1: Network Rail’s feedback on N8 Stratford and Maryland and Site Allocations; N8.SA2 Stratford Station, N8.SA5 Stratford Town Centre West, N7.SA1 Abbey Mills] Current Regulation 19 Wording Development shouldaddress existing open space deficiency by providing new open space by providing a series of pocket parks and a community garden at International Quarter North as part of the an extension to Mirabelle Gardens. The open space provision should prioritise community growing opportunities. Proposed Wording Development should review existing open space deficiencies by exploring opportunities for improvement, such as the creation of a series of pocket parks and a community garden at International Quarter North as part of the an extension to Mirabelle Gardens. The open space provision should prioritise community growing opportunities. The provision of pocket parks must not inhibit potential development plots coming forward that have the ability to generate revenue to fund the station improvements. Network Rail Rationale Part of this site allocation sits within the scope of the Stratford Station long term redevelopment project. The site allocation should consider a more flexible approach to the provision of open space and pocket parks to ensure it does not restrict developments plots coming forward that are required to help fund the Stratford Station infrastructure improvements that are being sought.	A change to this policy approach has not been made. We did not consider a change to be necessary as the need for additional publicly accessible green space is justified in 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. 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. Newham’s Green and Water Infrastructure Study has identified a need for the allocation, N8.SA5 Stratford Town Centre West, to deliver green space in the form a series of pocket parks and a community garden. This will be of benefit to residents on the site allocation and the wider neighbourhood. In addition, the site should provide publicly accessible play space, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm and a Neighbourhood Equipped Area of Play. The Council is satisfied that the plan remains sound without the proposed changes. The typo is noted. This has been rectified by making your wording change, which is included in the modification table: Development should address existing open space deficiency by providing new open space by providing a series of pocket parks and a community garden at International Quarter North as part of the an extension to Mirabelle Gardens. The open green space provision should prioritise community growing opportunities.
Reg19-E-102	Network Rail		Reg19-E-102/018	Neighbou rhoods	N8 Stratford and Maryland		Vision				Blank	No						Blank	[Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.] <u>N8 Stratford and Maryland</u> As set out, Bow Goods Yard is allocated as Strategic Industrial Land, operating as one of the largest strategic railheads in London, yet is significantly underutilised. The intensification and optimisation of	Error is noted. This has been rectified by making your wording change: N8 10. optimising and intensifying Strategic Industrial Location and Local Industrial Locations for employment functions, particularly those servicing the CAZ and intensifying and delivering a cluster of light industrial uses with residential co-location as part of a mix of uses at Canning Road West Local Mixed Use Area;

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			the rail freight and industrial activities will strengthen the sustainability of aggregate and concrete distribution across London, benefitting the wider construction industry. The importance of the Site should be recognised within emerging Policy N8 and the importance of effectively utilising brownfield land to meet identified needs, which is one of the key objectives of the National Planning Policy Framework. The emerging Policy is currently worded so that only the optimisation and intensification of Local Industrial Locations for employment functions is supported. In order for this policy to be found sound, the policy wording should be amended to also support the intensification and optimisation of Strategic Industrial Land to support the vision of growth for Stratford and Maryland.		which is included in the modification table.
Reg19-E-102	Network Rail		Reg19-E-102/020	Neighbou rhoods	N8 Stratford and Maryland		Vision				No	No						Blank		[For the plan to be found sound, the emerging policies should also be aligned to the London Plan to ensure that planning decisions reflect the overall strategy for London. Therefore, the Local Plan should allow for an element of SIL release through the intensification and consolidation of SIL and this should be occur as part of a plan-led process or as part of a co-ordinated masterplanning process in relation with the GLA and LBN.] This should be further reflected within the Neighbourhoods section of a draft Local Plan so that the vision of growth for Stratford and Maryland is able to be realised through the optimisation and intensification of Local Industrial Locations and Strategic Industrial Locations.	Error is noted. This has been rectified by making your wording change: N8 10. optimising and intensifying Strategic Industrial Location and Local Industrial Locations for employment functions, particularly those servicing the CAZ and intensifying and delivering a cluster of light industrial uses with residential co-location as part of a mix of uses at Canning Road West Local Mixed Use Area; which is included in the modification table.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/18	Neighbou rhoods	N8 Stratford and Maryland		4.34				Yes	Yes							N8 Stratford and Maryland The Authority supports the additional wording added to the Stratford and Maryland Profile paragraph 4.34 which states that “ part of the neighbourhood incorporates substantial areas of the Lee Valley Regional Park including the Lee Valley VeloPark and northern Olympic Parklands. ”		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/19	Neighbou rhoods	N8 Stratford and Maryland		Vision	14			Yes	Yes							The addition to the Vision statement is also supported as this adds a reference to the Regional Park under point 14 as follows: The vision for Stratford and Maryland will be achieved by 14. protecting and supporting enhancements to playing pitches and sports courts at Chobham Academy and the athletics provision at London Marathon Community Track and supporting the on-going development and enhancement of the Lee Valley VeloPark on the Queen Elizabeth Olympic Park as a world class cycling venue for track, BMX, road and mountain biking and as a venue for major events;		Support noted.
Reg19-E-172	Populo Living		Reg19-E-172/007	Neighbou rhoods	N8 Stratford and Maryland	N8.SA3 Greater Carpenters District													The current height allocations are overly prescriptive and do not fully align with the approved LLDC Carpenters masterplan. We suggest a use of more generic height descriptions, to ensure plans can evolve to reflect the changing regulatory environment		A change to this policy approach has not been made. We did not consider this change to be appropriate as policy D9 in the London Plan 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Therefore, the Council considers the site allocation design principles in conformity with the London Plan. Furthermore, the Council acknowledges that consent has been granted and that the site can still benefit from the existing consent. The permitted heights broadly align with the maximum permissible height outlined in TBZ18: Stratford High Street in the submission Local Plan. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-172	Populo Living		Reg19-E-172/008	Neighbou rhoods	N8 Stratford and Maryland														The draft LP shows the Rex building as being locally listed, however we don’t believe this is correct. Historic England have recently dismissed an application to give the building Listed status and we have applied for a Certificate of Immunity (COI) against further listings on behalf of the Council. We are concerned that locally listing the building could prevent its rejuvenation and future protection, as new operators will need to alter the building to make it safe and fit for purpose, and may be put off from investing in the building if they are likely to meet resistance.For reference, Newham Council has recently approved a strategy to lease the building to an entertainment operator.		The Rex, no.361-383, High Street, E15, has been identified as locally listed building recognising its group value. The borough’s local list can be found on the Council website on the Newham’s list of Locally Listed Buildings (row 82 of the Excel file). Locally listed buildings are identified as non-designated heritage asset, therefore planning permission for works affecting the Rex building, will be assessed against policy D9.3 and national policies relevant to non-designated heritage assets.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-172	Populo Living		Reg19-E-172/009	Neighbou rhoods	N8 Stratford and Maryland														The Bridge Road part of the site allocation appears to have a height limit of between 21 and 32 meters, despite recent pre-app and DRP meetings where elements at 15 storeys (c.55m) were agreed in principle. The Plan approach will be unviable to deliver the scheme in line with policy BFN2 if the height restrictions are enforced as they are currently drafted in the Plan. We suggest the LP entry is updated to reflect pre-application advice		A change to this policy approach has not been made. We did not consider this change to be necessary as whilst the Council acknowledges that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by 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, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan's requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/031	Neighbou rhoods	N8 Stratford and Maryland			Vision			No	No						No	Neighbourhoods Neighbourhood N8: Stratford and Maryland Hadley welcomes LBN’s revisions to the vision that support the evolution of Stratford Town Centre into an International Town Centre. This directly addresses Hadley's previous comments and aligns with our view that Stratford has the potential to become an International Centre on par with London's central centres.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/032	Neighbou rhoods	N8 Stratford and Maryland						No	No						No	[Neighbourhoods Neighbourhood N8: Stratford and Maryland] Hadley notes LBN's clarification regarding the application of Policy N8 and the evidence base in the form of the Newham Characterisation Study. However, we believe the policy's continued use of "moderate" uplift in density remains inadequate for Stratford Town Centre, particularly given it is located within the Olympic Legacy Opportunity Area, it is identified potential as an International Centre and the evolving national policy landscape. We urge the Council to reconsider this approach in light of the following: · Existing Planning Context: A planning application for the IQLN site, which has undergone multiple design review panels, demonstrates the viability of heights beyond those stipulated in the current policy. These heights have been deemed appropriate and sensitive to the surrounding context. · NPPF Consultation: The ongoing NPPF consultation proposes a significant shift towards promoting an uplift in density in urban areas and strengthening expectations for approvals on brownfield land. This aligns with the Government's objective to optimise land use and address housing needs. · International Centre Designation: The aspiration for Stratford Town Centre to become an International Centre necessitates a more ambitious approach to density. Benchmarking against other International Centres demonstrates that "moderate" uplift is insufficient to accommodate the scale of development required.	Therefore, we propose removing the word "moderate" from Policy N8 or replacing it with "appropriate" to allow for a more context-sensitive and ambitious approach to density. This would ensure consistency with the NPPF, acknowledge the site-specific context established through the planning application process, and enable Stratford Town Centre to fulfil its potential as an International Centre.	This wording change is not supported. We did not consider this change to be appropriate as the Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, part of the neighbourhood is classified as enhance area and part as transform. The Council considers that the vision for N8 Stratford and Maryland supports an appropriate balance between a moderate uplift of enhance areas [N8.1] and the transformation of identified site allocations [N8.2], which have already taken into account the high level of accessibility of the sites and their contribution to the growth of the neighbourhood. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/033	Neighbou rhoods	N8 Stratford and Maryland						No	No						No	Hadley welcomes the Council's support for the inclusion of development sites in the N8 neighbourhood and the emphasis on night-time activities and mixed-use development in Stratford Metropolitan Town Centre. We believe these elements are crucial to enhancing Stratford's status as a potential international centre.		Support noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/034	Neighbou rhoods	N8 Stratford and Maryland						No	No						No	We also support the provision of new small-scale employment floorspace to support a 15-minute network of employment uses, aligning with our plans for workspace at IQLN. The principle of maximising opportunities for new public realm while optimising land use and improving walking and cycling routes is also welcomed.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/035	Neighbourhoods	N8 Stratford and Maryland						No	No						No		Regarding the Council's proposed insertion regarding street trees, Hadley suggests revising the text to state: "the use of street trees, particularly at Victory Park and on Penny Brookes Street, Water Lane and Windmill Lane where feasible , and through the use of Sustainable Urban Drainage Systems, particularly on Penny Brookes Street and Windmill Lane." This modification clarifies that while street trees are highly valued, their implementation should consider technical feasibility and not inadvertently restrict opportunities for greening in instances where street trees may not be suitable.	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/remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/036	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					No	No						No	Site Allocation: N8.SA5 Stratford Town Centre West Hadley acknowledges the Council's updated approach to representing development and design principles on site allocation maps, as reflected in the revised N5.SA5 map. However, to ensure alignment with the evolving vision for IQLN, Hadley requests a collaborative discussion with LBN's policy team. This discussion will focus on refining the N5.SA5 map to accurately reflect the agreed-upon design principles and land use allocations established through ongoing engagement with the LLDC.	Specifically, we propose incorporating the following elements, which have received positive feedback and design acceptance through the current application process: · Employment Frontage on International Way: Reflecting the shift from Penny Brookes Street to International Way as the primary employment frontage. · Updated Site Layout: Incorporating the agreed-upon routes through the site and the distribution of open space. This collaborative approach will ensure the N5.SA5 map accurately represents the shared vision for IQLN and its contribution to the wider Stratford Town Centre.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Site Allocation map has been positively prepared. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/037	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Development Principles			No	No						No	Development Principles Hadley welcomes the Council's recognition of Stratford's potential as a future International Centre within the development principles of N8.SA5. We also note the change in policy wording to include "workspace" as a suitable use within the site, aligning with our previous request and Local Plan Policy J1.		Support noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/038	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Development Principles			No	No						No	We notice, however, that the revised draft plan does not appear to address our previous request for PBSA at IQLN. We reiterate our position that the site is well-suited for PBSA and that this use aligns with the principles outlined in Policy H.4 of the LLDC Local Plan, which identifies Stratford Town Centre as a suitable location for student housing. Furthermore, Hadley has secured support letters from higher education institutions demonstrating a clear need for student accommodation and their agreement for IQLN to fulfil this need. We urge the Council to reconsider the inclusion of PBSA within the development principles of N8.SA5 to reflect this demonstrated need and the site's suitability for this use.		A change to this policy approach has not been made. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/039	Neighbou rhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Infrastr ucture require ments			No	No						No	Hadley notes the Council's updated language regarding open space provision within the infrastructure requirements for N8.SA5. The commitment to providing a series of pocket parks and a community garden at IQLN, with a focus on community growing opportunities, aligns with the significant investment Hadley is making in varied public realm offerings on-site, including play spaces and community gardens. However, Hadley reiterates its previous objection to the use of IQLN as the primary location for addressing the area's open space deficiency. While it supports the provision of open space within its development, the onus should not fall largely on IQLN to rectify existing deficiencies. Hadley is particularly concerned that the associated site allocation map has not been updated to reflect a more equitable distribution of open space provision. The map, as it stands, continues to disproportionately rely on IQLN, misrepresenting the Council's intended approach and potentially impacting the feasibility of other developments within the allocation. Hadley urges the Council to revise the site allocation map to accurately reflect the commitment to a more distributed approach to open space provision, ensuring that the responsibility for addressing existing deficiencies is shared across the allocation area. This revised approach should also acknowledge the highquality public spaces being provided at IQLN, as agreed with the LLDC, compliant with local and regional policy, and endorsed through multiple design review panels.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for publicly accessible green space on this site has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. 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. Site allocation N8.SA5 Stratford Town Centre West is required to deliver a series of pocket parks and a community garden at International Quarter North as part of an extension to Mirabelle Gardens. This green space will be of benefit to both residents living in the site allocation and the wider neighbourhood in which the allocation sits. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/040	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Design principles			No	No						No	Design Principles Building heights Hadley appreciates the opportunity to provide further comments on the building heights proposed within N8.SA5. While we understand the Council’s intention to provide guidance, we believe a more flexible approach would be beneficial for this specific site. Our previous suggestion to consider height ranges as “indicative” rather than “maximum” within Table 1: Tall Building Zones stems from our belief that a designed approach, sensitive to site context and architectural excellence, can lead to a more successful outcome and better support the area’s potential to accommodate growth and achieve its aspirations as a Metropolitan Town Centre with international ambitions.	We believe an indicative height of 120m for N8.SA5 is more aligned with the area’s characteristics and future aspirations for the following reasons: 1. Established Precedents: The approved Stratford City Outline Planning Permission (SCOPP) (ref. 07/90023/VARODA granted in February 2005 and most recently amended by application ref. 10/90641/EXTODA) demonstrates a precedent for taller structures in the vicinity. 2. Emerging Context: Several recently completed or approved developments near the site, such as Manhattan Loft Gardens (143m AOD), Plots N16 (71m AOD and 47m AOD) and N18/N19 (147.6m AOD and 132m AOD), showcase the emerging acceptance of taller buildings in this location. Likewise, the two adjacent hotels to the northwest, at 70.3m AOD and 87.9m AOD, further highlight this context. 3. NPPF Consultation: The ongoing NPPF consultation emphasizes increased density and efficient land use, particularly in urban areas which supports a more ambitious approach to building heights. 4. Design Review Process: The proposed heights at IQLN have been carefully considered and refined through multiple design review panels with the LLDC, ensuring their appropriateness and sensitivity to the surrounding context.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to extend the 100m zone to include the site in its entirety and create a cluster around Stratford International in line with the spatial hierarchy and objectives of the new local plan. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/041	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Develo pment Principl es			No	No						No	Site Allocation: N8.SA7 Rick Roberts Way Development Principles Hadley does not support the allocation for Rick Roberts Way in its current drafting. In summary, the site allocation does not reflect the site allocation in the adopted LLDC Local Plan (SA3.6 Rick Roberts Way). The LLDC site allocation seeks a comprehensive mixed-use development of residential with education uses including the provision of a primary school and open space. This includes the minimum provision of 750 new homes across the whole site. The DSLP allocation also does not reflect the LLDC allocation nor the discussions and activities across the whole site, which is split in ownership between LLDC, LBN and St William Homes (former gasholders). The eastern part of the site has been identified for a special educational needs school. Additionally, a planning application has been submitted for the redevelopment of the gasholders for residential development (245 dwellings) (planning application reference number 23/00457/FUL) which is pending consideration. For the remainder of the site to the northwest, LLDC sought a development partner to bring forward a minimum of 450 homes. The development partner is required to pick up the shortfall in affordable housing across the LCS portfolio, as set out in the Unilateral Undertaking for Stratford Waterfront (planning application reference 18/00470/OUT), resulting in the requirement for a very high proportion of affordable housing. LLDC has selected Hadley and it is in this capacity that it has an interest in the site allocation.		A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/042	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Develo pment Principl es			No	No						No	The LBN DSLP site allocation allocates the site for “residential, employment uses, sports and recreation uses, education and open space”. In our previous representations we set out that the site should not be allocated for industrial. The DSLP has removed industrial from the list above, however, the text below still states that employment should prioritise light industrial. This should be removed alongside reference to employment.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. 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. The site allocation supports some business use and should re-provide the existing temporary storage use on the site. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/043	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Development Principles			No	No						No	Furthermore, the Development Principles set out that development should protect and enhance existing sports and recreation uses on the site currently. The recreational use on the site, a padel tennis club, is a meanwhile use, granted temporary consent under application 23/00165/FUL which expires on 24 June 2025. Prior to this use, the site was used for bus storage and temporary storage. This meanwhile use follows outline permission being granted for the site as part of the LLDC Legacy Communities Scheme. These uses should not be protected as the intention was the site is to be redeveloped for residential and a school as per the LLDC site allocation and not for sports and leisure purposes.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement to deliver sports hall provision has been justified by up to date evidence base, through Newham’s the Built Leisure Needs Assessment, which informs our policy approach to the protection and provision of sport and recreation facilities. This evidence was produced in collaboration with Sport England. The Strategy has established that this site is required to provide a sports hall, to meet the need for additional facilities in this area. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/044	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Development Principles			No	No						No	The requirement for open space is welcomed. However, the amount required at 1.2ha does not allow for the ambitions of the LLDC Local Plan nor the LLDC Development Agreement with Hadley to be met. Given the northern part of the site is identified for a school and a planning permission has been submitted for the redevelopment of the gasholders, this would render this requirement on the remaining portion of the site. This would result in residential development not being able to come forward as sought in the LLDC Local Plan nor the minimum 450 units required as part of the Development Agreement. It would render the development unviable. Instead, the LBN Local Plan should be consistent with the LLDC Local Plan allocating the site for residential, education and open space. The amount of open space should not be dictated by the site allocation, rather, as per the LLDC Local Plan it should set out that proposals should include local open space and playspace. As per with IQLN, the onus for open space provision should not fall largely on RRW when the site is currently allocated for a minimum of 750 residential units.		Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The amount of open space is informed by the Newham Green and Water Infrastructure Strategy. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/045	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Design Principl es			No	No						No	Design Principles As set out in response to Draft Policy DS4, Tall Buildings, Hadley objects to the wording and heights proposed within the policy and the heights set out within this site allocation. As previously discussed, the heights should be indicative to allow for a design led approach as per London Plan Policy D3 'Optimising site capacity through the design-led approach'. The heights on the site should be guided by a site-specific masterplan which optimises the capacity of the site, taking into account the LCS affordable housing requirements and viability for this site. As per the LLDC Site Allocation at present, if tall buildings are proposed, this should be assessed against the relevant design policies. The maximum heights do not represent the extensive masterplanning and design work that has taken place to date, including five pre-application meetings and a Quality Review Panel with LLDC, and the site-specific townscape, heritage and visual impact assessments. We request that heights are indicative and additional height in allowed in this location where demonstrated to meet relevant tall building and design policy tests.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/046	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Infrastr ucture require ments			No	No						No	Infrastructure Requirements Site Allocation N8.SA7 requires development to address open space deficiency “by providing a minimum of 1.2 hectares of open space”. As stated above, this is not in line with the LCS nor the adopted LLDC Local Plan Site Allocation. Open space and play space will be provided as part of any redevelopment proposals and will be maximised across the Site, however, this additional requirement for meeting the shortfall of open space provision should not form part of the Rick Roberts Way allocation. This should be removed from both the text and map that forms the site allocation.		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. Developments will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWSS5. 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. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/047	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Infrastr ucture require ments			No	No						No	The allocation requires that development provides a Special Education Needs and Disability school. The site allocation map on page 415 should be updated to confirm the position of the school on land owned by LBN.		A change to this policy approach has not been made. We did not consider this change to be necessary as 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. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/005	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Yes	No					Yes	The Proposed Development and Principle of Site Allocation The Site would fall within Site Allocation Pudding Mill Lane (N8.SA9) in the new Local Plan. The Site Allocation map for N8.SA9 Pudding Mill is presented on page 502 of the draft Local Plan. The Site is designated as a "Local Mixed-use Area" (LMUA) within the allocation. In the draft Local Plan, LMUAs are defined as employment locations protected and identified for (employment-led) mixed use to support business and industrial uses compatible with residential, including opportunities for co-location. We fully support that the principle of the draft Local Plan allocating the Site as an LMUA when compared with the outdated adopted LLDC Local Plan allocation as an ‘Other Industrial Location’, as an LMUA is more consistent with the consented and implemented scheme for residential-led mixed use development with employment at lower levels. Notwithstanding this, the following observations are made in relation to the ‘Development principles’ wording of the Site Allocation. Land Use The Site Allocation states that the following land uses are permissible: “Residential, employment uses, main town centre uses and social infrastructure including community facilities and health centre, and open space. [...] The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, including co-location with residential as part of the development around the Pudding Mill DLR Station and at Legacy Wharf. Development to the west of Cooks Road should be consistent with the Local Mixed Use Area designation. Development should provide the same quantity of business and industrial floorspace as the permitted schemes” The draft policy earmarks that development to the west of Cooks Road, i.e. the Site, should be consistent with the Local Mixed Use Area designation and provide the same quantity of business and industrial floorspace as the permitted schemes. As above, we support the Site Allocation as a LMUA, , but we suggest that the wording recognises that development should be residential-led mixed use including employment generating floorspace at ground floor, potentially comprising business and industrial floorspace, to better reflect the consented scheme and therefore ensure the Local Plan is sound in this respect.	On this basis, we consider that the ‘Development Principles’ wording should be amended to remove the following rewording: “Development to the west of Cooks Road should be consistent with the Local Mixed Use Area designation, for residential-led mixed use development including employment generated floorspace at lower levels, potentially comprising business and industrial floorspace . ~~Development should provide the same quantity of business and industrial floorspace as the permitted schemes”~~.	A change to this policy approach has not been made. We did not consider this change to be necessary as while we acknowledge that the site benefits from this planning permission (which can still be built out), the permission does not change the site allocation requirements. The Cook’s Road LMUA is designated for employment-led development to meet the employment needs at the site as informed in the Employment Land Review. In addition, it is important to maintain the permitted level of industrial floorspace on sites to meet our need for industrial floorspace set out in the Employment Land Review 2022 and to avoid it being reduced on a piecemeal basis. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/006	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill					Yes	No					Yes	Design Principles and Building Heights The site allocation sets out the following ‘Design principles’ that Proposed Development within it should follow: “The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.	We would therefore suggest the following amendments to the site allocation in relation to building heights: “The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should range between 21-32m (ca. 7-10 storeys) with taller	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared. 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 site can still benefit from these consents, these consents were permitted under

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys) to add wayfinding, with consideration given to marking the Pudding Mill Local Centre”. The Consented Scheme comprises two urban blocks, known as Buildings V1 and V2, which range between 2 and 14 storeys in height. The V1 building would be located at the southern end of the site, fronting onto Cook’s Road and the Bow Back River. The V1 building would be the tallest building on site at 14 storeys (54.0m AOD). It is also important to note that a further planning application (ref: 22/00384/FUL) was submitted in October 2022 proposing 496 residential units which included increasing the height of the V1 building from 14 storeys to 20 storeys in height. Whilst this application was withdrawn, the application documents included extensive design, townscape and environmental information to justify why a 20 storey building was acceptable in planning terms. Based on this extensive testing and particularly when considering the local context which includes existing taller buildings along Stratford High Street, including the 36 storey Capital Towers directly to the south of the site, it is our opinion that the southern end of the Vulcan Wharf site has the potential to accommodate buildings up to c.30 storeys in height. Given the extensive evidence justifying taller buildings on the Site, we propose that this potential for additional height should be reflected in the Site Allocation, allowing the Site to reasonably optimise the development potential of the Site to delivery much needed new homes.	buildings up to ~~50~~ 100m (ca. ~~16~~ 30 storeys) to add wayfinding, with consideration given to marking the Pudding Mill Local Centre and the Vulcan Wharf LMUA site.	the adopted LLDC 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. Based on the sieving exercise to identify tall building locations and maximum heights, N8.SA9 Pudding Mill site allocation is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations and height 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.
Reg19-E-191	University College London	Deloitte	Reg19-E-191/007	Neighbou rhoods	N8 Stratford and Maryland	N8.SA6 Stratford Waterfro nt South													Furthermore, whilst the Regulation 18 version of draft Site Allocation N8.SA6 Stratford Waterfront South previously referenced the need to accord with “Local Plan Policy D4 and the Tall Building Zone”, it is noted that the equivalent Regulation 19 Site Allocation now states that “Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 60m (ca. 20 storeys)” . In a manner similar to the above concerns with the Map of Newham’s Tall Building Zones, the latest draft Site Allocation N8.SA6 Stratford Waterfront South, which comprises almost exclusively the UCL East development site, fails to recognise the Outline Consent which permits heights above the 60m referenced. [originally under note of Policy D4 - taken forward as Site Allocation N8.SA6]	UCL therefore requests that both the above-mentioned map [refer to Map of Newham’s Tall Building Zones’], and the draft Site Allocation, be reviewed to ensure these recognise and correctly reference the permitted heights set out in the UCL East Outline Consent, and do so consistently across the draft Local Plan.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-191	University College London	Deloitte	Reg19-E-191/017	Neighbourhoods	N8 Stratford and Maryland	N8.SA6 Stratford Waterfront South													UCL welcomes the continued inclusion of UCL East as a key cultural facility within the N8 Stratford and Maryland neighbourhood and note the inclusion of UCL within site allocation N8.SA6 Stratford Waterfront South. In response to the Regulation 18 consultation, UCL noted that it saw merit in the inclusion of the ‘relevant planning history’ in the N8.SA6 Stratford Waterfront South, but that if including mention of the Outline Consent (ref. 17/00235/OUT) and Marshgate Plot 1 RMA (ref. 18/00424/REM), mention should also be given the RMAs for One Pool Street (ref. 18/00425/REM) and the Phase 1 Public Realm (ref. 18/00426/REM). It was felt that given the role these consents have played in already transforming the site allocation, and in particular the Outline Consent which will continue to shape development within Phase 2 of the new campus, mention in the allocation was sensible. UCL is disappointed to see that in the Regulation 19 version of the draft Local Plan, mention of the relevant planning history has been omitted in its entirety.	UCL considers that at the very least, mention should be given to the extant Outline Consent (ref. 17/00235/OUT) for the reasons as given above. In addition, and as set out previously, UCL feels that the N8.SA6 Stratford Waterfront South Site Allocation should reference and reflect the maximum height as permitted by the UCL East Outline Consent.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is justified, effective and positively planned. All the site allocation policies are consistent. The Draft Local Plan reflects an accurate position and supersedes the Regulation 18 document. The scheme which has been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/105	Neighbourhoods	N8 Stratford and Maryland														[Vision] 14.3 St William reiterates their previous comments on the proposed vision: 14.4 Part 1: given the strategic nature of this new neighbourhood, its location within an opportunity area and the significant change and transformation that has occurred already support should be outlined for a significant uplift in density rather than a moderate uplift in density. Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at Appendix 14.	Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments Vision Point 1 supporting a significant moderate uplift in density in ‘enhance’ areas where development enhances the character of the neighbourhood and consolidates the urban form;	This wording change is not supported. We did not consider this change to be necessary as the Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, part of the neighbourhood is classified as enhance area and part as transform. The Council considers that the vision for N8 Stratford and Maryland supports an appropriate balance between a moderate uplift of enhance areas [N8.1] and the transformation of identified site allocations [N8.2], which have already taken into account the high level of accessibility of the sites and their contribution to the growth of the neighbourhood. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/106	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													Site allocation N8.SA7 Rick Roberts Way 14.5 Overall, St William remains supportive of the general approach to the Rick Roberts Way site allocation N8.SA7 and the mix of uses that are promoted.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/107	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													[...]However, St William provides the following specific comments on this draft site allocation. N8.SA7 Rick Roberts Way § Map: § It should be made clear that the key routes identified are intended as pedestrian and cycle routes. § The triangular land under the ownership of LLDC, which lays between the land under the ownership of St William and Rick Roberts Way, should be included within the site allocation boundary as it forms part of the submitted planning application and St William has access rights over this land. This parcel of land is identified in a yellow outline in the plan below. [see Figure 14.1: Site Allocation N8.SA7 Suggested Inclusion at pg 42] § Furthermore, the portion of the St William land which is identified as an opportunity for open space is contrary to the ‘Development Principles’ outlined on page 496 which state that the 1.2 ha of open space should be provided on the publicly owned land (ie. not the St William site). The Map should be updated accordingly, orientated to clearly demarcate this 1.2 ha of open space within publicly owned land, rather than within the St William site. As currently written, the site allocation wording does not align with the map.	Appendix 14: – N8.SA7 Rick Roberts Way site allocation – Suggested amendments	A change to this policy approach has not been made. We did not consider this change to be necessary as 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. The site boundary for this allocation is the same as the previous LLDC allocation. The amount of open space is informed by the Newham Green and Water Infrastructure Strategy. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/108	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way														Appendix 14: – N8.SA7 Rick Roberts Way site allocation – Suggested amendments [see suggested amends to allocation table in layout at pg 127. Suggested changed below] Existing Public Transport Accessibility [rename of row] [under the Heritage Designations row] Within site allocation: River Lea Archaeological Priority Area (Tier 3) In proximity of: Three Mills Conservation Area 116 – 130 Abbey Lane (Grade II) Gate Lodge at Abbey Mills (Grade II) Former Superintendent House at Abbey Mills (Grade II) Chimney Stacks at Abbey Mills (Grade II) Abbey Mills Pumping Station (II*) [under Natural environment Designations row] Within site allocation: Air Quality Management Area Open Space Deficiency Adjacent to: Greenway Site of Importance for Nature Conservation, Metropolitan Open Land and Open Space	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is effective. Where the PTAL raring is changing during the plan period this has already been indicated in the site allocations and is consistent across all site allocations in the Local Plan. For heritage designations, the wording 'in the vicinity of' has been used which is considered to be effective and is consistent across all site allocations. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/109	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													Design principles: § St William requests that building heights are adjusted to extend to between 10 and 17 storeys (rather than 16 as drafted) with building heights stepping down towards the listed cottages on Abbey Lane. This reflects the building heights proposed within St William’s planning application which has been subject to a rigorous design review process in consultation with Council planning and design officers. Notwithstanding this, any building heights stated should be for guidance only and not preclude taller buildings as long as they are subject to a robust townscape and visual impact assessment. The proposed building heights as currently drafted are considered to be substantially lower than the emerging context for this neighbourhood which at Stratford High Street has buildings extending up to 43 storeys in height.	Appendix 14: – N8.SA7 Rick Roberts Way site allocation – Suggested amendments Design Principles The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to ~~50~~ 56 m (ca. ~~16~~ 17 storeys) towards the high street. Massing should step down towards the east to sensitively integrate with the low rise context of the listed cottages on Abbey Lane. The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy.	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 positively prepared. 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 site can still benefit from these consents, these consents were permitted under the adopted LLDC 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. Based on the sieving exercise to identify tall building locations and maximum heights and due to its proximity to Three Mills Conservation Area, N8.SA7 Rick Roberts Way site allocation is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations and height 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/110	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													[Design principles:] § Development in the south of the allocation (Stratford Gasworks) is intended for residential development only and this should be clarified within the policy wording.	[Appendix 14: – N8.SA7 Rick Roberts Way site allocation – Suggested amendments] [The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy.] Development in the south of the allocation is intended for residential only.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is effective. 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. We did not consider this change to be necessary as the development and design 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/111	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													[Design principles:] § Development is expected to improve walking and cycling conditions and the public realm on Rick Roberts Way, Stratford High Street and Abbey Lane including through improved frontages. This should be only ‘where possible’ as this must be balanced with site constraints and other aspirations for the site. § St William support the aspiration for improved connections to the Greenway. However, it should be acknowledged that the Greenway lies outside of the site allocation and is owned by a third party (Thames Water). It is pertinent to note that any improvements or new connection to the Greenway from the site allocation (including to the existing stairs connecting to Abbey Lane) would be subject to approval by Thames Water. And as such the allocation wording should be amended to require development to facilitate new connections. Additionally, any improvements or new connections would be subject to feasibility studies given the essential infrastructure which lies underneath the Greenway and extensive level changes. § The site allocation should make clear that the two new routes required either side of the school site should be provided on LBN and LLDC land holdings. The site allocation should be amended to remove the requirement to provide an accessible connection from Abbey Lane to the Greenway and stairs. Within St William’s planning application an accessible connection is proposed through the St William site between Abbey Lane and Rick Roberts Way, which would connect onto one of the new routes either side of the school connecting to the Greenway.	[Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments] The design and layout of the site should provide new and improved routes for walking and cycling, including where possible, facilitating two routes either side of the school site within the LBN and LLDC land holdings to connect the Greenway and Rick Roberts Way. Improvements should also be made to ~~provide a fully accessible connection between Abbey Lane and the Greenway~~ and the existing Greenway stairs ~~connecting to Abbey Lane in the south eastern corner of the site where possible.~~ Any connections or access improvements to the Greenway would be subject to Thames Water landowner consent. Development should provide a consistent frontage <i>[full extract of policy text continues, pg 129]</i>	A change to this policy approach has not been made. We did not consider this change to be necessary as the need to improved 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 accessibility through walking as cycling and the functionality of existing green space across the neighbourhood a key part of the N8 Stratford and Maryland neighbourhood vision. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/112	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													§ Infrastructure requirements: § The site allocation should make clear that the sports-lit Multi-Use Games Area (if not delivered at N8.SA5 Stratford Town Centre West), the open space, the SEND school and sports hall are to be provided within the site allocation on land within LLDC and LBN ownership and not the Stratford Gasworks site which is intended for residential development.	[Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments] [Infrastructure requirements] [...] Development should meet the need for school places by providing a Special Educational Needs and Disability school on the publicly owned land in accordance with Local Plan Policy SI4, which is within land that is under LLDC and LBN ownership. [...][see full site allocation text reproduced at pg 130]	The Council’s objective for this policy approach is to ensure the delivery of infrastructure in the locations it is needed. There is a requirement for a sports-lit Multi-Use Games Area (MUGA) on this site. This has been informed by Newham’s Built Leisure Needs Assessment (BLNA) which has identified a need for a MUGA in the area. The infrastructure requirements for each site allocation need to be met on site. However, the Council recognises the importance of ensuring the Plan is clear in its approach to site allocations and has made the following wording change, which is included in the modification table: Development should address existing green open space deficiencies by providing a small open green space with a minimum of 1.2 hectares. In addition to the green open space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm. Development should provide a sports-lit Multi-Use Games Area, on the publicly owned land , unless delivered at N8.SA5 Stratford Town Centre West. Play space should meet the requirements of Local Plan Policy GW55.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/113	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													§ Phasing and implementation: § Phasing should be short and medium term. § The underground cable route is a UKPN asset rather than National Grid. § The potential impact of the gas pipes located underneath the Site should also be taken into account at the pre-application stage.	[Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments] [Phasing and implementation] Short/ Medium Term The potential impact of the underground cable route on design and layout should be taken into account at the pre-application stage through early engagement with ~~National Grid~~ UKPN . The potential impact of the gas pipes located underneath the Site should also be taken into account at the pre-applications stage.	A change to this policy approach has not been made. We did not consider this change to be necessary as the phasing and implementation is justified as it is consistent with the phasing methodology for site allocations set out in the Site Allocation and Housing Trajectory Methodology Note. All major development has the responsibility and will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/114	Neighbours	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way														[Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments] [Development principles] Residential, employment uses, sports and recreation uses, education and open space. The site is a surplus former gas site with no provision of industrial or employment floorspace. The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace. Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies S11 and S13. The 1.2 hectares of open space should be provided on the publicly owned land. Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).	A change to the policy wording has not been made. We did not consider this change to be necessary as the approach is consistent with the existing LLDC site allocation that supports some business use and would re-provide the existing temporary storage use on the site. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/002	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way													GLP support the Regulation 19 draft Local Plan designation of the Site as a Local Industrial Location and the associated continued protection of industrial uses at the Site. As noted in our previous representations, this protection recognises the key role the Site has in local employment provision in Stratford. It further recognises the Site’s potential for redevelopment and intensification of employment uses to contribute towards meeting LB Newham’s policy requirements. GLP also welcomes the continued designation of the site for industrial use through Policy J1 L1L4 and that Policy J1, part 2f [reference to policy J1 L1L4 and policy J1, part 2f] provides flexibility for future development to respond to market trends and new economic sectors.		Support noted.
Reg19-E-204	Historic England		Reg19-E-204/004	Neighbourhoods	N8 Stratford and Maryland						Blank	Blank						Blank	As such, our remaining comments are limited to the Stratford & Maryland neighbourhood.		Comment noted.
Reg19-E-204	Historic England		Reg19-E-204/005	Neighbourhoods	N8 Stratford and Maryland						Blank	Blank						Blank	As above, we very much welcome the amendments to the relevant sections to the draft Plan. We consider these strengthen the consideration of historic environment related issues in relation to the tall building proposals that will come forward once the Plan is adopted. Nevertheless, it is clear that such proposals will have effects on the designated heritage assets in close proximity to the site allocations identified.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-204	Historic England		Reg19-E-204/006	Neighbourhoods	N8 Stratford and Maryland						Blank	Blank						Blank	We continue to consider that given the importance of these assets (not least as the greatest concentration of designated assets in the borough) and the likely scale of the effects from the development envisaged, further evidence and understanding should be gathered to inform the heights, scale and massing of individual development proposals. We strongly encourage a significance-based approach to addressing impacts on the historic environment through development proposals. Further details of this approach can be found in our advice documents: - The Setting of Heritage Assets (historicengland.org.uk) [see hyperlink in original representation] - The Historic Environment and Site Allocations in Local Plans (historicengland.org.uk) [see hyperlink in original representation] As with our previous consultation response and discussions since, we consider that additional analysis and understanding of the significance of these assets would go further in establishing the positive strategy for the historic environment required by the NPPF. This analysis could then inform further detailed design parameters to ensure the most effective conservation of heritage significance possible in the circumstances. This would also reflect London Plan policy HC1 in using understanding and knowledge of heritage significance to enhance place-making and contextually successful development.		Comment noted. This comment has been subject to further discussion with Historic England and the evidence base relating to policy D4 and related site allocations within Stratford and Maryland Neighbourhood and potential impact on historic assets remains an area of concern. 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.
Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/002	Neighbourhoods	N8 Stratford and Maryland						No	No							In line with our representations on the Regulation 18 Plan we welcome the objectives of draft Policy BFN1 (Spatial strategy) to direct significant levels of growth to the N8 Stratford and Maryland neighbourhood and to make the best use of land by supporting tall buildings in Tall Building Zones.		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/006	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West					No	No							Draft Site Allocation N8.SA5 (Stratford Town Centre West), where the majority of the SCE is located, sets out a series of proposed principles for the area. Welcome the identification of Plot M7B as a Development Plot on the Site Allocation Map in response to our Regulation 18 representations and its inclusion for residential and other town centre uses in the supporting text. As set out in the next section of these representations we remain concerned about the maximum heights proposed in the Tall Building Zone covering the SCE and the implications this will have for delivering the objectives of the Site Allocation. In line with the consented Plot M2 development, the Site Allocation should specifically reference and support the use of the Westfield Stratford City (WSC) rooftops for more beneficial uses such as publicly accessible retail and leisure space, including the potential to convert under-used parking areas. URW are also embarking on an estate-wide programme to install photovoltaics (PVs) to rooftop areas where feasible to so, and this should be encouraged by the Site Allocation.	Recommendation 1: Amend Site Allocation N8.SA5 to promote and encourage more efficient use of the WSC rooftop areas for publicly accessible leisure uses and sustainability enhancements. Plot M2 should also be specifically allocated for student accommodation use given its recent resolution to grant at LLDC’s Planning Decisions Committee. Suggested changes to wording of policy: Site Allocation N8.SA5: Add Development at Plot M2 on Celebration Avenue should be for student accommodation. The more efficient use of the Westfield Stratford City rooftop areas for publicly accessible leisure uses and sustainability enhancements in encouraged	A change to this policy approach has not been made. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/011	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station		Development Principles											[From Appendix 1] To realise the scale and quality of improvements envisaged to support the transformation of Stratford into an International Centre there is an opportunity for this part of the draft plan to promote the area immediately around Stratford Station as having the potential to deliver significant amounts of new housing, retail and other town centre uses at densities significantly higher than those in Maryland to reinforce the distinct character of these areas within the neighbourhood. In order for the site allocation to be deliverable we would encourage flexibility in how this achieved as there may be a range of strategies for how the site allocation may be delivered.	[From Appendix 1] Current Reg 19 wording: 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 along with residential, employment uses, main town centre uses and social infrastructure including, community facilities and education facilities, and open space. Additional wording to be inserted: Increased capacity at Stratford Station and enhanced connectivity to and from the Carpenters Estate, Montfichet Road and Queen Elizabeth Olympic Park should be achieved through comprehensive redevelopment of the site allocation Development at higher densities will be supported where it achieves a high standard of design.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the plan is positively prepared and effective. The Council is satisfied that the plan remains sound without the proposed changes. However, this policy approach also received comments which raised concerns regarding the reference of Stratford Station as an asset and as a wider area. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change: [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. ~~along with,~~ The development of the site allocation will provide residential, employment uses, main town centre uses and social infrastructure including community facilities and education facilities, and open space] which is included in the modification table. The wording change in relation to connectivity is not supported. We did not consider this change to be necessary as the wording of the site allocation would not preclude routes that improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic park. The proposed wording change in relation to development at higher density is also not supported. We did not consider this change necessary because the transformation of the site at high density is supported at point 2 of N8 Stratford and Maryland vision in line with the Newham Characterisation Study, which sets out the borough-wide approach to intensification, directing major regeneration to areas identified as to be transformed. The council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-217	LLDC		Reg19-E-217/012	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station		Development Principles											
[From Appendix 1] This is a key strategic site that will need to balance the delivery of infrastructure alongside the delivery of homes and affordable homes and we would therefore welcome support for taller elements to be allowed across the site allocation where justified and /or where agreed through a detailed master-planning process that can respond to the specific contextual and local character considerations of the site. Limiting the maximum heights at the levels proposed appears arbitrary, does not take account of the local established context or whether there would be benefit to the townscape or whether, through design review, the scheme has demonstrated exceptionally good design and public realm or other benefits. This approach would fail the soundness test and potentially hinder the deliverability of the site. The site allocation currently conveys a rigid interpretation of the street bridge and potential green space which could create an unrealistic expectation for there to be a large amount of green infrastructure over the DLR line. The focus of the site allocation should be on improving connectivity and public realm improvements and that matters of greening be controlled in the normal way through detailed design and policies requiring urban greening and biodiversity net gain. This will ensure that a full range of options can be explored and provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation is deliverable over the lifetime of the plan. [From Appendix 1] The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should ~~vary and respond to the local context range between 9—21m (ca. 3—7 storeys in proximity to the St John’s Conservation Area and between 21—32m (ca. 7—10 storeys) in the rest of the site~~, with consideration given to taller buildings up to 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) ~~in defined locations, with consideration given to in appropriate locations~~ marking Stratford Station. Development should conserve and enhance the St John’s Conservation Area and its listed buildings and their settings. In responding to the existing character of the town centre and conservation area, the shoulder of proposed buildings in immediate proximity to the conservation area should conserve and enhance the fine grain and townscape character of the continuous frontages of three to four storeys and rooflines. This should contribute to enclosing the space and establishing a sense of place, without affecting the dominance of the St John’s Church, which should remain the focal point of the conservation area. The key views, as set out in the Stratford St John’s Conservation Area Appraisal and Management Plan, should be protected to conserve and enhance the role of historic landmarks in the conservation area. Development should use a range of materials and detailing that complements the character of the conservation area to enhance its visual richness and quality. Tall buildings should provide a positive contribution to the skyline without harming the background of the protected linear view: King Henry VIII’s Mound, Richmond to St Paul’s Cathedral (9A). The design and layout of the site should establish a connected network of streets and spaces that connects to the wider street network and should create a street hierarchy. The design and layout of the site should create new and improved public realm and walking and cycling routes, ~~including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new decked street south of the station towards the Stratford High Street and which improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic Park. This should include a new bridge from the station square to Montfichet Road and a new or improved Jupp Road Bridge or equivalent alternative for walking and cycling.~~ ~~The provision of open space and other green infrastructure should improve connectivity to the Queen Elizabeth Olympic Park from the town centre and~~ A change to this policy approach has not been made. We did not consider this change to be appropriate as removing maximum height parameters will undermine the delivery of policy D4. 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, the site allocation design principles result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. 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.																			

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																				~~West Ham Park and the biodiversity value of the railway green corridor should be maintained where possible.~~ The design and layout of the site should also enable improved connections between the station across the Stratford High Street and Great Eastern Road through to N8.SA1 Stratford Central. Development should significantly improve the public realm and the environment for walking and cycling at Montfichet Road, including by reducing carriageways and repurposing residual space. Active frontages should front the station square and the decked street south of the station as well as on the Stratford High Street and Great Eastern Road. The design and layout of the redevelopment of Stratford bus station should locate bus stops in the open but consolidated in a single off-highway location to facilitate easy and efficient interchange. Bus stands can be located under over-station development. Design measures should minimise exposure to poor air quality, particularly on the Stratford High Street, Montfichet Road and Great Eastern Road in accordance with Local Plan Policy CE6. The design and layout of the site should mitigate the impact of noise from the railway and transport operational uses. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.	

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/013	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station		Infrastructure Requirements											[From Appendix 1] In order for the site allocation to be deliverable over the lifetime of the Plan, the site allocation wording should be amended in order for the most appropriate greening strategy to be considered as part of the rigorous assessment of options which is currently ongoing and not resolved. The changes proposed will mean a full range of options can be explored provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation delivers public realm and connectivity improvements in the most effective way.	[From Appendix 1] Increased station and interchange capacity through improved circulation, new ticket hall and new station entrances. A bridge should be provided from the new station square to Monfichet Road. Reconfiguration of Monfichet Road should enable the creation of a new station entrance, provided that the existing substation is relocated or reprovided. A school should be re-provided as part of the redevelopment of Jubilee House and Broadway House in accordance with Local Plan Policy SI4. ~~Development should address open space deficiencies by providing a pocket park or a series of pocket parks as part of the new public spaces. The open space provision should prioritise community growing opportunities.~~ Public realm improvements should incorporate high quality landscaping (including trees where appropriate) and respond to opportunities to enhance greening in the town centre ~~In addition to the open space provision, development should provide publicly accessible play space in the form of a Local Area for Play in the form of~~ Development should provide playable public realm and a Locally Equipped Area for Play. Play space should meet the requirements of Local Plan Policy GWS5. Land should be safeguarded for double tracking the DLR route.	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for a pocket park or a series of pocket parks as part of the new public space, play and community growing space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. Increasing public access to green space across the neighbourhood a key part of the N8 Stratford and Maryland neighbourhood vision. 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. Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GWS2 and GWS3. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5. 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. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/014	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station		Site Allocation Map											[From Appendix 1] The site allocation currently conveys a rigid interpretation of the street bridge and potential green space which could create an unrealistic expectation for there to be a large amount of green infrastructure over the DLR line. We would encourage the focus of the site allocation to be on improving connectivity and public realm improvements and that matters of greening be controlled in the normal way through detailed design and policies requiring urban greening and biodiversity net gain.	[From Appendix 1] The site allocation map should be amended to: Remove the green shading over the DLR tracks. The Map currently creates an unrealistic sense that there would be a linear green space or pocket park and whilst we share the ambition to green the public realm we consider the area being designated as an opportunity for public improvement would support a range of options, including greening to come forward. The Raised Street and Bridge should end immediately adjacent to Stratford Station. It should not extend to Stratford High Street as the map currently creates a sense that the bridge must terminate here and it may be the case, that through detailed design testing, other possibilities emerge as the Stratford station project is at an early stage in the design process. See Appendix 3. [See Appendix 3 as an attachment to the response which shows proposed changes]	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. Developments will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5. 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. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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 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. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/015	Neighbourhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Development Principles											[From Appendix 1] The requirement to provide a sports hall is not in line with the extant outline permission for Rick Roberts Way (ref. 11/90621/OUTODA as varied by 18/00471/VAR) or the current site allocation in the LLDC Local Plan 2020–2036. Both of these documents prioritise the delivery of residential-led development and a school. Furthermore, it should be noted that the existing sports facility on-site is approved as a meanwhile use for a specified temporary period only (18/00162/FUL as varied by 23/00140/VAR), under and in accordance with LLDC Policy B.3: Creating Vitality through Interim Uses. This policy clearly states that interim uses should not impact the deliverability of the site allocations within the Local Plan or existing permanent planning permissions. The sports facility is an interim use intended solely to activate the site until the long-term developments come forward. Therefore, the requirement to protect and enhance the current sports facility is directly contrary to the LLDC policy under which the temporary permission for the sports facilities has been approved, it is also not in line with the extant planning permission for the comprehensive redevelopment of the site and not in line with the current site allocation. The Urban Design and Landscape Framework (UDLF) for Rick Roberts Way which was jointly prepared by LLDC, the London Borough of Newham and National Grid/St William, does identify the potential for sports and leisure provision within the proposed school on land owned by the London Borough of Newham, but it is not envisaged as a re-provision of existing temporary facilities.	[From Appendix 1] Proposed alternative: Residential-led mixed use development, ~~employment uses, sports and recreation uses~~, education uses and open space. ~~Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.~~ ~~Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.~~	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective. 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. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/016	Neighbou rhoods	N8 Stratford and Maryland	N8.SA7 Rick Roberts Way		Develo pment Principl es											[From Appendix 1] The proposed requirement for the site allocation to deliver employment uses, as outlined in draft Policy J1 (Employment and Growth), prioritising light industrial uses, is not in line with the extant outline permission for Rick Roberts Way nor the current site allocation in the LLDC Local Plan. Both the outline permission and the Local Plan seek to provide active frontages through retail and predominantly envisage residential developments and a school. The Rick Roberts Way site falls entirely outside any industrial land designation in both the current LLDC Local Plan and the proposed Newham draft Local Plan Policy J2, as indicated on the map on page 188. Therefore, there is no requirement for this land to deliver industrial uses. While Policy J1 (Employment and Growth) encourages employment uses, this does not mandate industrial uses on a site that is not designated as industrial. Overall, this requirement is incompatible with the approved uses in the extant outline permission and contradicts the guiding aspirations of the UDLF. As such, it could significantly undermine the delivery of already intended strategic uses such as new homes and a school.	[From Appendix 1] Delete: ~~The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace.~~	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for industrial floorspace would reprovide the existing temporary storage use on the site. Policy J3 provides flexibility that applicant can submit a Relocation Strategy to demonstrate reasonable endeavours to relocate existing businesses for more efficient use of land. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-217	LLDC		Reg19-E-217/017	Neighbou rhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill		Develo pment Principl es											[From Appendix 1] In order for the site allocation to be deliverable and in line with the extant planning permission, the wording should be amended as it currently requires employment uses to prioritise industrial use. The wording limits the type of employment uses that should come forward and the employment floorspace in the outline consent predominantly includes commercial and business uses. There should therefore be an element of flexibility on the type of employment uses that should come forward on site.	[From Appendix 1] Proposed alternative: The employment uses should be consistent with Local Plan Policy J1 ~~and prioritise industrial floorspace,~~ and seek to integrate industrial floorspace, including co-location with residential as part of the development around the Pudding Mill DLR Station and at Legacy Wharf. Development to the west of Cooks Road should be consistent with the Local Mixed Use Area designation. Development should provide the same quantity of business and industrial floorspace as the permitted schemes.	A change to this policy approach has not been made. We did not consider this change to be necessary as it is clear in the site allocation wording that development should provide the permitted quantity of employment floorspace in line with the planning consent. The site allocations identify the priority employment floorspace needs for industrial use to address the borough’s needs on industrial floorspace as identified in the Employment Land Review (2022). The wording of the site allocation would not preclude employment uses other than the priority uses being delivered. However, proposed use deviated from the priority uses will need to be sufficiently justified by economic evidence in the submission as required in Policy J1. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/018	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill		Development Principles											[From Appendix 1] The proposed draft text in the second paragraph of the design principles is not consistent with the extant outline consent or the current site allocation in the LLDC Local Plan, particularly regarding the height restriction of up to 16 storeys for taller elements. The outline consent includes taller elements that exceed this limit, with a maximum height of 95m. The policy should therefore be amended to accurately reflect this.	[From Appendix 1] Proposed alternative: Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to ~~50m~~ 100m (ca. ~~16~~ 33 storeys) to add wayfinding, with consideration given to marking the Pudding Mill Local Centre.	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared. 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 site can still benefit from these consents, these consents were permitted under the adopted LLDC 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. Based on the sieving exercise to identify tall building locations and maximum heights, N8.SA9 Pudding Mill site allocation is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations and height 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.
Reg19-E-217	LLDC		Reg19-E-217/019	Neighbourhoods	N8 Stratford and Maryland	N8.SA8 Bridgewater Road		Development Principles											[From Appendix 1] The site allocation for Bridgewater Triangle (BWT) includes a height limit of 50m (c. 16 storeys), reflecting the outline consent for the site. However, it has been necessary to review the current outline consent in order to address viability and deliverability challenges arising from macro-economic conditions as well as regulatory changes including the new fire safety regulations. In light of this, capping heights at certain limits within the site allocation is unduly prescriptive and would have a negative impact on proposed amendments and/or new planning applications that seek to optimise the site's capacity in order to provide a deliverable housing scheme, including affordable housing. The Tall Building Annex in The Newham Characterisation Study (2024) states that varying heights within Tall Building Zones are intended to allow for the establishment of a borough-wide spatial hierarchy, transitioning heights to the surrounding context and sensitive areas and creating a coherent townscape and skyline. The wording of the site allocation does not reflect this approach as the site is immediately adjacent to areas with greater height limits and therefore should be optimised in a form which fits with the existing context as well as the wider emerging context for the area. Provided that the amenity of allotment holders can be protected, it is considered that there should be some flexibility in height in this site allocation.	[From Appendix 1] Proposed alternative: Building heights ~~should~~ could range between 21-32m (ca. 7-10 storeys) with taller buildings ~~up to~~ around 50m (ca. 15 storeys) in the east and south east of the site. ~~Massing should step down towards~~ adjacent to the allotments in the north of the site ~~should be to sensitively integrate with the low rise context~~ designed to protect amenity and prevent overshadowing.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as policy D9 in the London Plan 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. Supporting text of policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". Therefore, the Council considers the site allocation design principles in conformity with the London Plan. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is deliverable and has therefore made the following wording change: [Massing should ~~step down towards~~ be sensitively designed to prevent overshadowing the allotments in the north of the site ~~to sensitively integrate with the low rise context and prevent overshadowing.~~ and to protect their functionality.] which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-217	LLDC		Reg19-E-217/020	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station													[Appendix 3 is an attached map]	[Appendix 3 is an attached map with amendments to the Site Allocation map for N8. SA2 Stratford Station]	The issues raised in this comment have been subject to further discussions with the LLDC and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground between the LLDC and the Council. The Council's objective for the site allocation maps is to provide an illustrative representation of how the development principles for the site could be delivered. 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 proposes to amend the map to show the rail tracks which is included in the modification table.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/69	Neighbourhoods	N8 Stratford and Maryland														Ballymore therefore suggests the above changes should be made to the draft site allocation to ensure the successful delivery of this site allocation. [relates to all proposed changes to N2.SA3]		Comment noted. Each change has been reviewed and responded to.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/70	Neighbourhoods	N8 Stratford and Maryland														Neighbourhoods – N8: Stratford and Maryland Following out previous representations we support the identification that the Stratford Waterfront Site Allocation (N8.SA6) is located within the Stratford Metropolitan Centre. This recognition of the key aspect the wider allocation can bring to the area will be paramount to the ongoing success of the space.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/71	Neighbourhoods	N8 Stratford and Maryland														We also support the ongoing height designations for the areas within the N8 Neighbourhood notably for N8.SA6 Stratford Waterfront Site and N8 SA8 Bridgewater Road. The ongoing recognition that height and density can be secured within these allocations is important to their overall delivery of new homes.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/72	Neighbourhoods	N8 Stratford and Maryland	N8.SA8 Bridgewater Road													N8 SA8 Bridgewater Road We are pleased to see the inclusion of Warton Road within the site allocation following our previous comments. The synchronisation with the extant outline consent for the site will help bring clarity to development proposals coming forward.		Comment noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/73	Neighbourhoods	N8 Stratford and Maryland	N8.SA8 Bridgewater Road													We are however concerned that the Council continues to reference open space within the site allocation without identifying within the relevant site allocation diagram or associated Proposals Map where the existing open space (which must be replaced) is located. It is appreciated that there is a need to retain the MOL and Allotment land however further clarity is needed on the open space commentary for the scheme to be able to identify and review the constraints of the allocation.	On this basis we suggest that the first paragraph of the Site Allocation Development Principles is amended to the below. Development should protect and maintain the openness of the Metropolitan Open Land. The design and layout of the site should protect and retain the allotments and the existing open space, including access and functionality.	A change to this policy approach has not been made. We did not consider this change to be necessary as 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. The amount of green space has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/073	Neighbourhoods	N8 Stratford and Maryland															Given the vibrancy and diversity of Stratford Metropolitan Centre we consider that the vision should state that “a range of new housing will be delivered to meet identified needs” to be clear that specialised housing products including PBSA and coliving will be encouraged in this neighbourhood. Given the presence of the higher educational facilities in the neighbourhood we consider that the vision should acknowledge that new PBSA will be provided and recognise its contribution to housing supply.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is effective. The neighbourhoods policies and 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. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-234	Places for London		Reg19-E-234/020	Neighbourhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No						Blank	To realise the scale and quality of improvements envisaged to support the transformation of Stratford into an International Centre there is an opportunity for this part of the draft plan to promote the area immediately around Stratford Station as having the potential to deliver significant amounts of new housing, retail and other town centre uses. This would be at densities significantly higher than those in Maryland. Any development progressed via the design-led approach to site optimisation as set out in the London Plan and taking into account the surrounding context and opportunities presented by the redevelopment of this highly accessible public transport interchange located within an international Town Centre. In order for the site allocation to be deliverable we would encourage flexibility in how this achieved as there may be a range of strategies for how the site allocation may be delivered in terms of design’ layout and land use. This is a key strategic site that will need to balance the delivery of infrastructure alongside the delivery of homes and affordable homes.	Development principles 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 along with residential, employment uses, main town centre uses and social infrastructure including, community facilities and education facilities, and open space~~ and enhanced connectivity to and from the Carpenters Estate, Montfichet Road and Queen Elizabeth Olympic Park should be achieved through comprehensive mixed use redevelopment of the site allocation. Development at higher densities will be supported where it achieves a high standard of design.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is effective. The site allocations identify the priority land use needs for each site consistently across all allocations. The methodology for how we formulated the site allocations is fully set out in the Site Allocation and Housing Trajectory Methodology Note. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-234	Places for London		Reg19-E-234/021	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No					Blank	Building heights We would welcome support for taller elements to be allowed across the site allocation where justified and /or where agreed through a detailed master-planning process that can respond to the specific contextual and local character considerations of the site. However, limiting the heights to the maximum heights proposed appears arbitrary, does not take account of the local established context or whether there would be benefit to the townscape or whether, through design review, the scheme has demonstrated exceptionally good design and public realm or other benefits. London Plan Policy D9 Part B requires local planning authorities in London to set ‘appropriate’ tall building heights within tall building zones. We consider that this provides flexibility for boroughs to set ‘appropriate’ height ranges (rather than maximum height caps. We recommend the use of ‘appropriate’ heights, as set out in our representation on Policy D4: Tall Buildings. It is also very difficult to interpret the maximum tall buildings map in this area in terms of which precise sites are covered in different height zones. We consider that the Council’s Characterisation and Tall Buildings Study have been undertaken in a spatial vacuum with the scope of these studies limited to the borough of Newham only. Newham’s tall building study is not supported by massing studies or townscape or visual appraisals. In our view, this should be considered an essential requirement when setting restrictive maximum height caps at plan-making stage on a site of this size and importance in terms of housing delivery, connectivity and place making (both locally and strategically). This approach would fail the soundness test and potentially hinder the deliverability of the site. As 3-D modelling of and testing of key heritage townscape and LVMF strategic views has not been undertaken, we recommend that this is acknowledge and reflected in the draft policy, with the building heights set as an ‘appropriate height range’ and acknowledgement that the precise height and massing will need to be justified and subject to detailed testing at application stage.	[Development principles] Building heights should vary and respond to local context range between 9 – 21m (ca. 3 – 7 storeys in proximity to the St John’s Conservation Area and between 21 – 32m (ca. 7 – 10 storeys) in the rest of the site, with taller buildings up to 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in defined locations, with consideration given to taller buildings ranging from 13 to 33-storeys in appropriate locations marking Stratford Station, subject to design quality and testing of heritage, townscape and strategic views and the cumulative environmental impact. In relation to tall buildings, please refer to our representation on D4: Tall Buildings and in particular, our recommendation that, in line with the London Plan, the draft Local Plan should set ‘appropriate’ height ranges for tall buildings, rather than prescriptive maximum height caps in defined areas.	A change to this policy approach has not been made. Your comments regarding policy D4 are addressed separately. In relation to site allocation design principles, we did not consider this change to be appropriate as removing maximum height parameters will undermine the delivery of policy D4. 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. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, the site allocation design principles result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. 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.
Reg19-E-234	Places for London		Reg19-E-234/022	Neighbou rhoods	N8 Stratford and Maryland	N8.SA2 Stratford Station					Blank	No					Blank	Layout and public realm The site allocation currently conveys a rigid interpretation of the street bridge and potential green space which could create an unrealistic expectation for there to be a large amount of green infrastructure over the DLR line. This is not going to be deliverable. We would encourage the focus of the site allocation to be on improving connectivity	[Development principles] The design and layout of the site should create new and improved public realm and walking and cycling routes, which improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic Park including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new decked street south of the	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is positively planned and effective. The site allocations have been informed by the Newham Characterisation Study to help improve connectivity across the neighbourhood. The wording of the site allocation would not preclude routes that improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic park.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			and public realm improvements and that matters of greening be controlled in the normal way through detailed design and policies requiring urban greening, biodiversity net gain and landscape and public realm improvements as a result of development. This will ensure that a full range of options can be explored and provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation is deliverable over the lifetime of the plan. In order for the site allocation to be deliverable over the lifetime of the plan we would suggest that the site allocation wording is amended as follows in order for the most appropriate greening strategy to be considered as part of the rigorous assessment of options which is currently ongoing and not resolved. The changes proposed will mean a full range of options can be explored provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation delivers public realm and connectivity improvements in the most effective way.	station towards the Stratford High Street and a new bridge from the station square to Montfichet. This should include a new or improved Jupp Road Bridge or equivalent alternative. The site allocation map should be amended to: - Remove the green blob over the DLR tracks. The Map currently creates an unrealistic sense that there would be a linear green space or pocket park and whilst we share the ambition to green the public realm we consider the area being designated as an opportunity for public improvement would support a range of options, including greening to come forward. - The Raised Street and Bridge should end immediately adjacent to Stratford Station. It should not extend to Stratford High Street as the map currently creates a sense that the bridge must terminate here and it may be the case, that through detailed design testing, other possibilities emerge	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. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated 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. 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 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.. The council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-240	West Ham United Football Club	PMV Planning	Reg19-E-240/006	Neighbou rhoods	N8 Stratford and Maryland														WHUFC would welcome discussions with the Council about the potential for a specific site allocation under Policy N8 of the draft Local Plan [...].		Comment noted. The Council did try to meet with you in Summer 2023, but this opportunity was not taken up.
Reg19-E-013	Transport for London		Reg19-E-013/106	Neighbou rhoods	N9 West Ham	N9.SA1 Plaistow North													We note that provision of step free access has now been removed from the list of infrastructure requirements for site N9.SA1 although it is still included in the N9 neighbourhood policy. It is unclear how step free access could be delivered because N9.SA1 is the only site allocation and development funding would be required to deliver step free access.		A change to this policy approach has not been made. We are not prioritising step-free access over other infrastructure requirements, as set out in Local Plan Policy BFN4. Local Plan Policy 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-013	Transport for London		Reg19-E-013/107	Neighbourhoods	N9 West Ham	N9.SA1 Plaistow North						No							London Underground have a maintenance access across this site.	To ensure soundness the following wording should be added as an infrastructure requirement: ‘The potential constraint of the LU access route on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’	A change to this policy approach has not been made. We did not consider this change to be necessary as 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.
Reg19-E-033	Thames Water		Reg19-E-033/131	Neighbourhoods	N9 West Ham	N9.SA1 Plaistow North					Blank	No						Blank	[Waste Response] On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.
Reg19-E-033	Thames Water		Reg19-E-033/132	Neighbourhoods	N9 West Ham	N9.SA1 Plaistow North					Blank	No						Blank	[Additional Comments] This is based on the residential element. Require more detail on any other uses to fully assess impact.	[Make reference to specific infrastructure issues identified in attached table in site allocations.]	Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as development on this site allocation is required to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. This is required in Local Plan Policy W4 as well as phasing and implementation sections in the site allocation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/004	Neighbourhoods	N9 West Ham	N7.SA2 Parcel for ce					Blank	Blank						Blank	[1. INTRODUCTION] As mentioned, Berkeley Homes have recently submitted a Section 73 application and Reserved Matters Application to amend the extant permission. These proposals were subject to extensive pre-application engagement with LBN, the Greater London Authority (‘GLA’), and the Borough’s Design Review Panel (‘DRP’). Through these meetings, the principles of the proposed land uses, height and massing, landscape, sustainability, and transport were discussed.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-172	Populo Living		Reg19-E-172/010	Neighbou rhoods	N9 West Ham	N9.SA1 Plaistow North													The site allocation contains a requirement for a new bridge to be installed over Network Rail and TFL train tracks. There is already a link to the south of the tracks and this infrastructure is considered unnecessary, expensive and unlikely to be viable to deliver alongside other LP policy expectations. It is suggested that alternative interventions should be considered that are less costly and more in keeping with Secure by Design principles.		Comment noted. The connection from the site to the Greenway is part of the existing site allocation, and the bridge over the railway tracks follows feasibility work regarding this connection. Development should provide a bridge landing on Whitelegg Road for walking and cycling connecting to the Greenway as set out in the Infrastructure Requirements of site allocation N9.SA1 and the bridge will be necessary to establish the connection across the rail track. The proposed connection to Greenway at the site will improve public access to wider area in the neighbourhood and borough via Greenway. The Council considers that this connection will reduce severance and improve connections to green space.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/003	Neighbou rhoods	N9 West Ham	New Site													The Site extends to approximately 1.2ha and is located outside of West Ham Park, on the north-eastern corner. A site location plan is included in Appendix 1 . West Ham Park is a Site of Importance for Nature Conservation (“SINC”), Metropolitan Open Land (“MOL”) and designated Green Space. The Site does not form part of these designations. However, the Site does share a Grade II Registered Park and Garden listing (no. 1001685) with West Ham Park, first listed in February 2004 by Historic England. The Site is not within a conservation area, nor does it contain any statutorily or locally listed buildings. There are no Tree Preservation Orders (“TPOs”) within or adjacent to the Site. The Site is located in a predominantly residential area (Use Class C3). Other nearby uses include the Stratford School Academy opposite the Site, and a small parade of shops to the north along Upton Lane. The majority of the Site has a Public Transport Accessibility Level (“PTAL”) of 2, where a score of 0 is very poor access, and 6b is excellent access to public transport. The Environment Agency’s Flood Risk Map designates the Site in Flood Risk 1, meaning there is a low probability of flooding.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/004	Neighbourhoods	N9 West Ham	New Site													The Site is owned by City of London and has always been inaccessible to the public. It contains a number of derelict glass house structures and land that became vacant in 2016. The Site was previously used for growing flowers and other plants that would have been used to decorate parks and other open spaces located within the City of London. The nursery was not open to the public and did not operate as a retail outlet. The Site also includes two residential cottages which are located at the northern edge of the Site, leased by City of London. Although the Site has been maintained by the City of London, the legacy use of the Site and its function has ceased. The Site as it stands is not currently fit for continuation of its original use. The Site also actively detracts from the character and appearance of RPG and does not provide any public benefit.		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/005	Neighbourhoods	N9 West Ham	New Site													In this context, CoL are currently exploring potential options to bring the Site back into a viable, beneficial and sustainable use. This includes through the potential redevelopment of the Site, which may include the provision of new homes and / or employment space and / or community facilities and / or new open space. The CoL's aspiration is to give 50% of the Site over to open green space and / or uses that would support and benefit the local community.		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/020	Neighbourhoods	N9 West Ham	New Site													HOUSING As noted above, the CoL are currently exploring potential options to bring the Site back into a viable, beneficial and sustainable use. This includes through the potential redevelopment of the Site, which may include the provision of new homes and / or employment space and / or community facilities and / or new open space. It is considered that the redevelopment of the Site can help to deliver several of the Council's strategic objectives including delivering 'people-friendly neighbourhoods with green and clean streets'. If redevelopment proposals were to include new homes or employment floorspace, then we consider the proposals could also meet the Council's objectives of delivering 'homes for residents' and 'an inclusive economy to support people in these hard times'.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			Proposed modifications and explanation	LB Newham Response
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?		
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/024	Neighbourhoods	N9 West Ham	New Site														Comment noted. Newham’s Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. Critically, Newham’s issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA’s 2017 SHLAA, which informed Newham’s London Plan 2021 housing target. As a borough, 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 till 2033/34. 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 residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/025	Neighbourhoods	N9 West Ham	New Site														Comment noted. Newham’s Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. In addition, Newham’s Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. Critically, Newham’s issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA’s 2017 SHLAA, which informed Newham’s London Plan 2021 housing target. As a borough, 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 till 2033/34. 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 residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/026	Neighbou rhoods	N9 West Ham	New Site													Of note, is the Site Allocation N8.SA8 Bridgewater Road. This site is described as “vacant land, open space, including allotments [Pudding Mill Allotments]”. The site contains x3 partial MOL designations (Olympic Park Lee Valley, The Greenway - Pudding Mill and Waterworks River), in addition to the Queen Elizabeth Olympic Park green space designation. For this site, the Council accept the principle of residential development and open space, and subsequently designated as a site allocation. Oddly, the site is not designated as an allotment in the G&W Strategy 2024. The Pudding Mill Allotments is owned by the London Legacy Development Corporation and managed by the Manor Gardening Society. This Site Allocation N8.SA8 raises questions as to why the former Nursery Site has been assessed and considered differently.		The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces. However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration during the examination, thereby removing the community growing space designation: Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham's Metropolitan Review. The error regarding the Puddling Mill Allotments is noted. This has been rectified by proposing following modifications which will be presented to the Inspector for their consideration during the examination: Correct green space designation at N8.SA8 Bridgewater Road to designate as a community growing space and not part of the wider Queen Elizabeth Olympic Park, Parks and Gardens green space designation We have amended the Green and Water Infrastructure Strategy to reflect these updates, these are included in the revised 2025 version of the Strategy.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/027	Neighbourhoods	N9 West Ham	New Site													Given our concerns with this evidence base, which has informed Draft Policy GWS1 and the former Nursery 'green space' designation, we still maintain that our Site should be considered suitable for residential development and designated as a site allocation, given that it comprises brownfield, previously developed land in a sustainable location.		A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of this site as Metropolitan Open Land is justified in Newham's updated Metropolitan Open Land Review (2025). In addition, Newham's Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, 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 till 2033/34. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/028	Neighbourhoods	N9 West Ham	New Site													PUBLIC CONSULTATION As part of the CoL's process to explore potential options for the Site, the CoL appointed make:good to run a series of public engagement sessions and workshops between March and June 2024. The purpose of these engagement sessions was to discuss the opportunities for the 50% of the Site which, as part of any future development, is intended to benefit local people. The results of the feedback indicated that the top items that stakeholders wanted to see on this 50% of the Site were • Café and community space; • New green spaces; and • Sheltered seating. Young people were invited to make models and drawings of their ideas and their top themes for this 50% of the Site were: • Café; • Play for older children; and • Wildlife and nature spaces.		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/029	Neighbourhoods	N9 West Ham	New Site													With regard to the remaining 50% of the Site, some people expressed a desire for this part of the Site to not be used for housing, however others acknowledged that housing or alternative development could help fund improvements to West Ham Park but wanted development to be sensitive in scale and appearance. The next step in this process is for make: good to finalise their consultation report and report back to the CoL. The CoL remain committed to engagement with key stakeholders as they explore development options, to maximise the benefits of the Site for all. It should be noted by the Council that some stakeholders are, at this early stage, open to accepting development on part of the Site, should this bring about wider benefits for West Ham Park, so long as this development is sensitively designed.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/034	Neighbou rhoods	N9 West Ham	New Site													On the basis of the above, we argue that the Site should not be designated as ‘green space’. We consider that the potential redevelopment of the Site, which may include the provision of new homes and / or employment space and / or community facilities and / or new open space would make best use of the Site in line with NPPF Section 11 (Making Effective Use of Land) and London Plan Policy GG2 (Making the Best Use of Land) and align with wider policy aspirations of the Draft Newham Local Plan.		The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces. However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration during the examination, thereby removing the community growing space designation: Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham's Metropolitan Review. Newham’s Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, 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 till 2033/34. The Council is satisfied that the plan is sound without the proposed changes. 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 residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan. We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-C-022	Ashraf Patel		Reg19-C-022/001	Social Infrastructure	SI1 Existing community facilities and Health facilities						No	No						No	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.	Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Additionally, we would like to address the inflexibility of the current policy regarding the size of the facilities. We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community. There is a lack of purpose-built facilities for individuals with disabilities. These facilities would help the socially isolated elderly population connect with others. The draft proposal does not fully utilise the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately-owned land has been acquired to meet the future needs of the community. The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	Comment noted. 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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/001a	Social Infrastructure	SI1 Existing community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/001b	Social Infrastructure	S11 Existing community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	[The Local Plan is not legally compliant and is unsound for several critical reasons:] Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community.		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 development principles section of the site allocation direct the reader to Local Plan Policies S11 and S12 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. Policy S12 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 S12.1 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. Clause 7 of Policy S12 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. Additionally, Clause 7.a of Policy S12 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/001c	Social Infrastructure	SI1 Existing community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/001d	Social Infrastructure	SI1 Existing community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	[To make the Local Plan legally compliant and sound, the following modifications are necessary:] Comprehensive Needs Assessment: The Local Plan must incorporate a comprehensive needs assessment for the proposed facility. This assessment should consider the current and projected demographic trends, the growing size of the community, and the specific needs of women, children, and disabled individuals. Without this critical evaluation, the plan will remain disconnected from the actual requirements of the community. [...] By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.		A change to this policy has not been made. We did not consider this change to be necessary as Policy SI2 clause 1.a sets out that the delivery of new community facilities on identified site allocations are 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. It should be noted that a Community Facilities Needs Assessment (2022) has been undertaken to support the plan which looks at the provision of the particular types of social infrastructure. 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. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The 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. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-221	Franklin Mark Henson		Reg19-E-221/001	Social Infrastructure	SI1 Existing community facilities and Health facilities	N11.SA1 East Beckton Town Centre					Blank	Blank						Blank	This gym has helped many underprivileged people and produced Olympic winners and contestants for years now. It seam a great shame that a facility facility created specially for gymnastics that meets all the criteria to train Olympians to a stand that wind gold for Great Britain over the years it's gonna be pulled down for housing. I'm sure this facility has kept many under privileged children in the area adults young people, and from the surrounding areas at a sport vacant access, cheaply and readily. There is no other facility like this in East London let alone learn that I don't think as we did so well in the Olympics this year in in Paris it seems a very great shame that you're gonna hand it over to be pull down. i'm sure that must be other brown sites that could be turned into adequate housing and even more sports facilities around London and the UK that would help and privileged people achieve gold medals or even life goals. I kindly ask if you could look into objecting to the gym being pulled down and give it a greater lease of life.		A change to this policy approach has not been made. We did not consider this change to be necessary as the existing sports and recreation facility at the site will be protected through the requirements outlined in Local Plan Policy SI3. It is also clear in the site allocation that future developments at the site have to re-provide the existing facility follow the requirements in the policy. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-240	West Ham United Football Club	PMV Planning	Reg19-E-240/004b	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	Yes						Blank	As set out in our previous representations, the stadium should be recognised through a specific site allocation under Policy N8 of the Plan.		As set out in our previous response in the Regulation 18 consultation report, the area in and around the Stadium has not been included as a site allocation due to the lack of clarity around the proposals. We did reach out for a conversation to gain further clarity but this offer was not taken up. Any proposals at the stadium would be assessed against the N8 neighbourhood policy as well as a range of other policies in the Local Plan, including the community facility policy.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-036	Huzaifa Delawala		Reg19-E-036/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities	N7.SA1 Abbey Mills					No	No					No	1. Inadequacy of Current Facilities The current facilities serving our community are significantly inadequate and fail to address the day-to-day requirements of our members. The existing structure is insufficient in size and functionality, which hinders our ability to serve our members efficiently. This limitation is particularly pronounced when it comes to accommodating the needs of women and children. The spatial constraints of the existing facilities restrict our capacity to foster inclusivity and participation, thereby diminishing the overall effectiveness of our community engagement. [originally put against Policy N7 SA1, however taken this part of the response forward against Policy SI2]	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

LB Newham Response		The Council is satisfied that the plan remains sound without the proposed changes.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Neighbourhoods Comments to the full Regulation 19 Representations																					
Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-036	Huzaiifa Delawala		Reg19-E-036/001b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	2. Necessity for Size Adjustment in Replacement Facilities In light of the limitations of the current facilities, it is imperative that any proposed replacement facility be designed with consideration for the actual needs and demands of our community. Maintaining the size of the new facility at the same level as the existing one would not address the current shortcomings and would fail to accommodate the growing needs of our congregation. A more comprehensive approach to sizing, driven by a detailed needs assessment, is essential to ensure that the new facility adequately supports the diverse and expanding requirements of our members. [originally put against Policy N7 SA1, however taken this part of the response forward against Policy SI2]		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-078	Shoaib Ismail		Reg19-E-078/03	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities	N7.SA1 Abbey Mills													Failure to Reflect Community Needs: The proposed retention of the facility's current size disregards the clear and growing demand within our congregation. Any replacement facility must be designed with the actual needs of the community in mind. Without expanding the facility's capacity, the plan is set to perpetuate the current inadequacies, further disadvantaging the community.		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																						
Reg19-E-085	Omarji Ahmed		Reg19-E-085/02	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities	N7.SA1 Abbey Mills					No	No								1. Inadequacy of Existing Facilities The current facilities used by our community are grossly insufficient in meeting the day-to-day requirements of worshippers, particularly women and children. The structure is too small to cater to the diverse needs of our congregation, which restricts participation and inclusivity. A failure to address this in the Local Plan undermines the community's ability to gather for religious and social purposes, which is crucial for fostering community spirit and cohesion. [originally against SI1, SI2 and SI3 - taking forward SI2]	4. Optimizing Land Use for Housing and Community Facilities o Proposed Modification: The policy should be modified to fully explore the potential of the site to deliver both much-needed housing and larger community facilities. Consideration should be given to acquiring privately-owned land adjacent to the site to expand the project, ensuring that both housing and community needs are met. This approach has been successfully implemented in other parts of London and should be adopted in Newham. o Reasoning: The current draft does not make full use of the land’s potential, especially for affordable housing and larger community spaces. By acquiring additional land and expanding the scope of the development, the Local Plan can better address housing shortages and support the community’s future needs. This will align the plan with broader goals for economic growth and housing provision, making it sound. Conclusion: In summary, these modifications would ensure that the Local Plan is legally compliant and sound by addressing the actual needs of the community, optimizing land use, promoting inclusivity, and contributing to local economic growth. These changes will also ensure that the plan aligns with the values of diversity and sustainability that Newham prides itself on.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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

LB Newham Response		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.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-085	Omarji Ahmed		Reg19-E-085/03	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities	N7.SA1 Abbey Mills					No	No							2. Failure to Consider Actual Community Needs The proposal to retain or replace the existing structure with one of a similar size demonstrates a lack of understanding of our growing community's needs. Any replacement facility should be scaled to meet the current and future demands of the congregation. The failure to adequately size the proposed facility makes the plan unsound because it does not address the actual infrastructure needs of our diverse community. [originally against SI1, SI2 and SI3 - taking forward N7 SA1 Abbey Mills]		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-089	Idris Khankhara		Reg19-E-089/01	Social Infrastruc ture	SI2 New and re-provided communi ty facilities and Health facilities	N7.SA1 Abbey Mills					No	No							1.i use this site fir my spiritual needs [originally against SI1, SI2 and SI3 - taking forward SI2]	.adapt and recognise faith policy in town center plan	Comment noted.
Reg19-E-110	Yunusbhai Patel		Reg19-E-110/01	Social Infrastruc ture	SI2 New and re-provided communi ty facilities and Health facilities	N7.SA1 Abbey Mills					No							No	Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council’s stated goal of fostering community cohesion. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward SI2]		Comment noted.

Reg19-E-117	Sajid Bhai Vahora		Reg19-E-117/01a	Social Infrastruc ture	SI2 New and re-provided communi ty facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	Inadequate Facilities: The current plan fails to address the inadequate facilities that are central to our community’s daily needs. The existing structure, which is too small, limits access for worshippers, particularly women and children. This lack of adequate space prevents full participation and undermines the inclusivity essential for a diverse borough like Newham. [originally against N7.SA1 Policies Map - taking forward SI2]		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-034	F Patel		Reg19-C-034/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-034	F Patel		Reg19-C-034/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No					No	The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-034	F Patel		Reg19-C-034/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-034	F Patel		Reg19-C-034/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-035	Luqman Patel		Reg19-C-035/001	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	I think this is not a good plan to have a pathway in the middle of the riverine centre. I don't agree with the plan.	I think the pathway should be on the edge of the land and not in the middle.	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-036	Suleman Ebrahim Patel		Reg19-C-036/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-C-036	Suleman Ebrahim Patel		Reg19-C-036/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills						Yes	No					No	The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-036	Suleman Ebrahim Patel		Reg19-C-036/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-036	Suleman Ebrahim Patel		Reg19-C-036/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-039	Usman Maljee		Reg19-C-039/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 does not fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs, and hence does not serve the longstanding resident who do not have access to housing.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-C-039	Usman Maljee		Reg19-C-039/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills						Yes	No					No	The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to serve needs of all worshippers, in particular women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-039	Usman Maljee		Reg19-C-039/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-039	Usman Maljee		Reg19-C-039/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-040	Mohammad Patel		Reg19-C-040/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																					
Reg19-C-040	Mohammad Patel		Reg19-C-040/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills						Yes	No					No	The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.		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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-040	Mohammad Patel		Reg19-C-040/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-040	Mohammad Patel		Reg19-C-040/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-041	Ibrahim Luqman Patel		Reg19-C-041/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	I do not wish to see a park and parthway		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/002a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	[The Local Plan is not legally compliant and is unsound for several critical reasons:] Alternative Locations and Fragmentation: Due to the insufficiency of the existing facility, worshippers have been forced to seek alternative locations, fracturing the unity of the community. This situation diminishes the collective community spirit and contravenes the council's stated goal of fostering community cohesion.	[To make the Local Plan legally compliant and sound, the following modifications are necessary:] [...] Utilization of Land for Economic and Housing Growth: The current draft does not maximize the land's potential for economic growth or housing development. We propose that the plan integrate larger community facilities with housing development, as seen in other parts of London. This approach would not only meet the community's needs but also contribute to local economic growth and job creation in the construction sector. [...] [By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.]	Comment noted. the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met.
Reg19-C-044	Samir Doodwalla		Reg19-C-044/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	Newham's diverse community is not fully supported by the current local plan for N7 SA1. The plan appears to prioritize providing easier access to new luxury developments and a play area that mainly benefits new residents.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-044	Samir Doodwalla		Reg19-C-044/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No					No	The existing community facilities are inadequate, failing to meet the daily needs of the local population. These facilities are too small to accommodate all worshippers, especially women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-044	Samir Doodwalla		Reg19-C-044/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The proposed key route plan significantly limits the potential size of future facilities needed to accommodate all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-044	Samir Doodwalla		Reg19-C-044/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The draft plan fails to maximize the land’s potential for essential affordable housing. By collaborating with landowners, the council could develop much-needed community housing to better serve the local population.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024).
Reg19-C-045	Sahina Doodwalla		Reg19-C-045/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The current local plan for N7 SA1 does not adequately support Newham’s diverse community. It seems to focus on improving access to new luxury developments and a play area that primarily serves new residents.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-045	Sahina Doodwalla		Reg19-C-045/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No					No	The existing community facilities are insufficient and do not meet the daily needs of the local population. These facilities are too small to accommodate all worshippers, particularly women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-045	Sahina Doodwalla		Reg19-C-045/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The proposed key route plan greatly restricts the future expansion of facilities necessary to serve all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-045	Sahina Doodwalla		Reg19-C-045/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The draft plan does not fully exploit the land's potential for crucial affordable housing. By partnering with landowners, the council could create much-needed community housing to better meet the needs of the local residents.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024).
Reg19-C-046	Adam Samir		Reg19-C-046/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The local plan for N7 SA1 falls short in addressing the needs of Newham's diverse community. It appears to prioritize access to new luxury developments and a play area that mainly benefits recent arrivals.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-046	Adam Samir		Reg19-C-046/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No					No	Current community facilities are inadequate and fail to meet the everyday needs of residents. These spaces are too limited to serve all worshippers, especially women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-046	Adam Samir		Reg19-C-046/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The proposed key route plan imposes significant limitations on the future growth of facilities required to accommodate all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-046	Adam Samir		Reg19-C-046/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The draft plan fails to fully leverage the land's potential for essential affordable housing. By collaborating with landowners, the council could develop much-needed community housing to better serve the needs of local residents.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024).
Reg19-C-047	Ayyub Doodwalla		Reg19-C-047/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The N7 SA1 local plan does not effectively cater to the diverse needs of Newham’s community. It seems to focus on enhancing access to new luxury developments and a play area that primarily benefits new residents.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-047	Ayyub Doodwalla		Reg19-C-047/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No					No	Existing community facilities are insufficient and do not meet the daily requirements of the local population. These facilities are too small to accommodate all worshippers, particularly women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-047	Ayyub Doodwalla		Reg19-C-047/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The proposed key route plan would significantly limit the future expansion of facilities needed to accommodate all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-047	Ayyub Doodwalla		Reg19-C-047/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The draft proposal fails to make the most of the land’s potential for essential affordable housing. By collaborating with landowners, the council could develop much-needed community housing to better serve the local population.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024).
Reg19-C-048	Amina Doodwalla		Reg19-C-048/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The local plan for N7 SA1 does not adequately address the needs of Newham's diverse community. It seems to prioritize providing easier access to newly developed luxury residences and a play area that primarily benefits new residents.		Comment noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-C-048	Amina Doodwalla		Reg19-C-048/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No					No	The existing community facilities are insufficient and do not meet the daily needs of the local population. These facilities are too small to accommodate all worshippers, especially women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-048	Amina Doodwalla		Reg19-C-048/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The proposed key route plan would greatly limit the future expansion of facilities needed to accommodate all local worshippers.		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-C-048	Amina Doodwalla		Reg19-C-048/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	The draft proposal fails to fully leverage the land's potential for essential affordable housing. By partnering with landowners, the council could develop much-needed community housing to better serve the local population.		Comment noted. The site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024).
Reg19-C-051	Idris Patel		Reg19-C-051/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	it is the duty of the council to engage with the land owner prior to any planning.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-EC-001	Mohammad Badruddoza		Reg19-EC-001/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	Newham has a diverse community, this local plan for N7 SA1 fails to fully cater for the needs of the local community. The local plan only seems to serve the purpose of providing easier access to the new luxury developments that have been recently developed neighbouring N7 SA1 and a play area that will serve only the new residents' needs.		Comment noted. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 the community of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-EC-001	Mohammad Badruddoza		Reg19-EC-001/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills						Yes	No					No	The current facilities serving the community on the existing site are inadequate and fail to meet the day-to-day requirements of the community, who access the facilities. The existing facilities are too small to cater to the needs of all worshippers, particularly women and children.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-EC-001	Mohammad Badruddoza		Reg19-EC-001/001c	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The current proposal for the key route would severely restrict the size of any future facility to cater for the needs of all local worshippers		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-EC-001	Mohammad Badruddoza		Reg19-EC-001/001d	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	The draft proposal does not fully utilize the land's potential for much-needed affordable housing, working with the landowners the council could develop much needed community housing, which would serve the local community.		A change to this policy has not been made. We did not consider this change to be necessary as the site has been optimised to balance the need of homes, community facilities and open space. The capacity of the site has been tested to inform the site allocation and the housing trajectory. More details on the methodology used for the capacity testing can be found in the Site Allocation and Housing Trajectory Methodology (July 2024). 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. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-C-027	Farhan		Reg19-C-027/001	Social Infrastructure		N7.SA1 Abbey Mills					No	No					No	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively.The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.	Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Additionally, we would like to address the inflexibility of the current policy regarding the size of the facilities. We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community. There is a lack of purpose-built facilities for individuals with disabilities. These facilities would help the socially isolated elderly population connect with others. The draft proposal does not fully utilize the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately-owned land has been acquired to meet the future needs of the community. The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 key route shown in the map is a design principle reflecting the Local Plan’s desire to

LB Newham Response	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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. The Council is satisfied that the plan remains sound without the proposed changes.
Proposed modifications and explanation	
Representor Comment	
Complies with Duty to Cooperate?	
Consistent with the London Plan?	
Consistent with the NPP?	
Effective?	
Justified?	
Positively prepared?	
Sound?	
Legally Compliant?	
Implementation text	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Agent	
Representor	
Representation Reference	

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-C-028	Asif badat		Reg19-C-028/001	Social Infrastructure		N7.SA1 Abbey Mills					No	No					No	Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal	The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.	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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan remains sound without the proposed changes.

Neighbourhoods Comments to the full Regulation 19 Representations																				
Reg19-C-029	Mohammad Patel		Reg19-C-029/001a	Social Infrastructure		N7.SA1 Abbey Mills						Yes	Yes					Yes	The current facilities are inadequate and fail to meet the day-to-day requirements of our community. The limitations of the existing structure hinder our ability to serve our members effectively.The existing facilities are too small to cater to the needs of all worshippers, particularly women and children. This lack of space restricts participation and inclusivity within our community. It is imperative that the size of any proposed replacement facility be driven by the actual needs and demands of our community. Retaining the same size as the existing facility would not address the current inadequacies and would ultimately fail to meet the growing needs of our congregation. Due to the inadequacies of the existing facility, many worshippers are compelled to seek alternative locations for their religious practices. This situation is not conducive to fostering a strong community spirit. Newham is a borough that values diversity; however, it has not succeeded in incorporating diverse infrastructure in the upcoming draft proposal.	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 development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. 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. 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. 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 is also relevant when considering the type and scale of any re-provision of community facility on this site. 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. 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. 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: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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.

LB Newham Response		The Council is satisfied that the plan remains sound without the proposed changes.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

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

Reg19-C-029	Mohammad Patel		Reg19-C-029/001b	Social Infrastructure		N7.SA1 Abbey Mills					Yes	Yes					Yes	Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. Additionally, we would like to address the inflexibility of the current policy regarding the size of the facilities. We strongly advocate for a needs assessment to be conducted, as the current policy does not adequately reflect the dynamic requirements of our community. There is a lack of purpose-built facilities for individuals with disabilities. These facilities would help the socially isolated elderly population connect with others. The draft proposal does not fully utilize the land's potential for much-needed housing, along with larger community facilities, as seen in other parts of London and across the country outside of LBN. Privately-owned land has been acquired to meet the future needs of the community. The site will contribute to economic growth in the construction sector and provide local employment opportunities. However, the proposed key route has not been adequately addressed with the necessary diligence and care to align with housing and economic growth potential.		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 development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1. 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. 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 of Muslim faith. It requires new, expanded and improved community facilities to: • demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space • ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and • be inclusive and accessible. 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 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 site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met. The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-C-037	Nailah Zangharia		Reg19-C-037/001	Green and Water Spaces		N7.SA1 Abbey Mills					Yes	No						No	The authorities should not enforce a park and pathway.	Instead of the park there should be housing and the pathway should be on the edge of the land.	Comment noted. A change to this policy has not been made. We did not consider this change to be necessary as the key route shown and the amount of green space on the map are design principles reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station and to provide green space. 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.
Reg19-C-038	Fatima Patel		Reg19-C-038/001	Green and Water Spaces		N7.SA1 Abbey Mills					Yes	No						No	I do not like the plan of a park and pathway	I gave money to the project for ladies religious facilities not a park	Comment noted. A change to this policy has not been made. We did not consider this change to be necessary as the key route shown and the amount of green space on the map are design principles reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station and to provide green space. 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.
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/003b	General		N7.SA1 Abbey Mills					No	No						No		[To make the Local Plan legally compliant and sound, the following modifications are necessary:] [...] Addressing the Proposed Key Route: The plan must revise the alignment of the proposed key route with greater attention to its impact on housing potential and economic growth. A more thoughtful and deliberate planning process is required to ensure that the proposed route supports the overall development objectives of the borough. [By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.]	A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-006	Maria Marino		Reg19-E-006/002	Neighbou rhoods							Blank	No						Blank	I have checked on line and I saw wards boundaries has changed with not justification. For example the Manor Park Village Conservation Area is out of Manor Park in the LP to joint Forest Gate when wich has already another Conservation Area Forest Gate , increasing power of the wealthiest in Forest Gate and in-balancing démographie and diversity in Manor Park who lost the only existent conservation area in the ward . Also my area was Manor Park with E12 with the LP lost importance e became part of East Ham with not justification at all . Manor Park it self with the main Elisabeth Elizabeth Station became isolating in the middle of nowhere and unified with Little Ilford that is totally disconnected . Can you please reviews boundaries ? and associate for the ward line that has not resident participation please .		Comment noted. These neighbourhoods have been identified through the Newham Characterisation Study (2022) and informed by public engagement which took place in autumn 2021 and winter 2022. 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 then 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.
Reg19-E-006	Maria Marino		Reg19-E-006/004	Neighbou rhoods							Blank	Blan k						Blank	I hope you can take my observation and do your own inquiries and see why the boundaries has changed that in my point of view is arbitrary following fonciere expeculationrn gain used to increase the value of already expensive properties en Forest Gate and unified with them. the wealthiest , in deprivation of already poor vulnerable areas that need to be boosted as the one I'm living and working for example .		Comment noted. These neighbourhoods have been identified through the Newham Characterisation Study (2022) and informed by public engagement which took place in autumn 2021 and winter 2022. 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 then 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.
Reg19-E-006	Maria Marino		Reg19-E-006/007	Neighbou rhoods							Blank	Blan k						Blank	I would like to understand how the place I live and work will grow as per the LP they will be in an extremity of East Ham where nothing happens except for the Green hill new affordable homes scheme That has tipping up and quite small with not shops designed there as far as I know .		Comment noted. The neighbourhood vision for East Ham is set out in Policy N12 and is supported by policy clauses which set out the development opportunities for the area.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/005	Neighbou rhoods															Changes to Neighbourhood boundaries, policies, site allocations and site allocation maps have been made to in the Regulation 19 Draft Submission Newham Local Plan. We have no further comments to make on these policies beyond those made at Regulation 18 stage.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/008	General															We have also identified a number of sites where there is a potential interface with TfL infrastructure which may not be apparent. For those sites we think it would be helpful to add an additional requirement to consult with TfL Infrastructure Protection at the pre application stage.		Comment noted. Individual responses are provided to the proposed additional wording outlined in your representation.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-015	Greater London Authority		Reg19-E-015/035	Neighbou rhoods															Site allocations The site allocations do not set out capacity assumptions, so it is not possible to understand if the draft Plan is able to meet its housing target between 2019 and 2029. In addition, it means that stakeholders cannot review proposed capacity assumptions and comment on them easily. Capacity figures provide the basis from which the borough can monitor site development progress against strategic figures for growth including those for housing. It should also be noted that this is a requirement of LP2021 Policy D1B. As the draft Plan has projected a significant shortfall in the ability to deliver housing, capacity assumptions for the site allocations should be considered critical in setting the minimum housing requirements and other growth over the Plan period.		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. 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 so the Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-015	Greater London Authority		Reg19-E-015/036	Neighbou rhoods		N2.SA1 Silvertow n Quays													Site/s: N2.SA1 – Land at Silvertown Quays, North Woolwich Road. Comments: There is an existing safeguarded waste site within this allocation. The intention should be to protect and maintain the waste capacity of the facility until at least the current review of the East London Waste Plan is completed. The Mayor notes the intention to promote and prioritise industrial floorspace including for warehousing and distribution uses.		A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation requirements are justified. The waste sites referred to in this comment are subject to a longstanding extant planning permission 14/01605/OUT, which will result in the redevelopment of the waste uses. The Council is satisfied that the plan remains sound without the proposed changes.

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

Reg19-E-015	Greater London Authority		Reg19-E-015/037	Neighbourhoods		N2.SA2 Lyle Park West													Site/s: N2.SA2 – Land at Knights Road and Bradfield Road. Comments: The site contains waste sites and non-designated industrial sites. The Mayor notes that the intention is to prioritise industrial floorspace for warehousing and light industry. However, the focus should be on Class B uses which LBN can control and which are not subject to permitted development rights.		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. Floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Class MA can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. ~~Monitor for location against designated employment land and non-designated employment sites.~~ ~~Monitor approvals (gains and loss) and completions.~~ Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites. which are included in the modification table.
Reg19-E-015	Greater London Authority		Reg19-E-015/038	Neighbourhoods		N2.SA3 Connaught Riverside													Site/s: N2.SA3 – St Mark's (Connaught Riverside) Comments: The allocation is clear that it is home to a designated industrial area (LSIS) in the site plan and as such LBN		Comment noted. It is clear in the site allocation wording that development should prioritise industrial floorspace within the designated Local Industrial Location boundary, which is informed by the Employment Land Review, and employment uses should meet requirements as

LB Newham Response			set out in Policy J1, which is in conformity with the London Plan Policy E6.			The Council is satisfied that the plan remains sound without the proposed changes.		
Proposed modifications and explanation								
Representor Comment			should note that Policy E6 of the LP2021 applies.					
Complies with Duty to Cooperate?								
Consistent with the London Plan?								
Consistent with the NPPF?								
Effective?								
Justified?								
Positively prepared?								
Sound?								
Legally Compliant?								
Implementation text								
Justification								
Clause								
Introduction								
Site allocation								
Policy								
Chapter								
Comment Reference								
Agent								
Representor								
Representation Reference								

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-015	Greater London Authority		Reg19-E-015/039	Neighbourhoods		N2.SA3 Connaught Riverside												Site/s: N2.SA3 – St Mark’s (Connaught Riverside) Comments:The focus should be to prioritise Class B uses as these are not subject to permitted development rights.	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. Floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Class MA can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. ~~Monitor for location against designated employment land and non-designated employment sites.~~ ~~Monitor approvals (gains and loss) and completions.~~ Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-015	Greater London Authority		Reg19-E-015/040	Neighbourhoods		N2.SA3 Connaught Riverside													Site/s: N2.SA3 – St Mark’s (Connaught Riverside) Comments:The allocation is clear that the maximum throughput of Connolly’s Yard waste site needs to be re-provided elsewhere, either within the site itself or within London. To be consistent with Policy SI 9 of the LP2021 this would need to be secured before the site can be used for other uses.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is effective, and will be considered alongside the requirements London Plan in decision making. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-015	Greater London Authority		Reg19-E-015/041	Neighbourhoods		N4.SA2 Silvertown Way East													Site/s: N4.SA2 [and N4.SA3] Comments: The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough’s industrial needs over the Plan period.		Comment noted. It is clear in the site allocation wording that the employment uses should meet requirements as set out in Policy J1, which is in conformity with the London Plan Policy E7C where mixed use development will be supported at identified site allocations. 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. In light of your other comments which raised concerns regarding the lack of control on permitted development right to protect industrial capacity within Use Class E, the Council recognises the importance of ensuring the Plan is positively prepared, justified, effective and in conformity with the London Plan, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. which are included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-015	Greater London Authority		Reg19-E-015/042	Neighbou rhoods		N4.SA3 Canning Town Holiday Inn													Site/s: [N4.SA2] and N4.SA3 Comments: The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough’s industrial needs over the Plan period.		Comment noted. It is clear in the site allocation wording that the employment uses should meet requirements as set out in Policy J1, which is in conformity with the London Plan Policy E7C where mixed use development will be supported at identified site allocations. 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 is satisfied that the plan remains sound without the proposed changes.
Reg19-E-025	Daniel Zimarev		Reg19-E-025/002	Neighbou rhoods							Blank	Blan k						Blank	[Excellent outreach to the inhabitants. Here are my thoughts on what will make the plan better.] <u>Neutral:</u> > The natural location for Greenway bridge entry would be at landfill area end of Holbrook Road, but it is understandable that private ownership of a landfill area (though questionable to have a rubbish dump in a residential area) makes things more difficult.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/027	Neighbou rhoods							Blank	No						Blank	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table provides Thames Water’s site-specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements. Early engagement between the developers and Thames Water would be beneficial to understand: • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be. To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when. Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.	Make reference to Thames Water free pre-application advice service and that applicants should include Thames Water response with their planning applications.	Comment noted. Local Plan Policy W4 requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. The Council is satisfied that the plan remains sound without changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-042	Mohammed Vali		Reg19-E-042/003b	General		N7.SA1 Abbey Mills					No	No						No	In addition, the local plan had outlined Key Route through to the prime land location, and I strongly object as this proposal is impacting the future use of this privately owned land facility for the use by the community. [originally against Policies Map Abbey Mills N7 SA1 - taking forward as Site Allocation]		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/003	Neighbou rhoods							Blank	Blan k						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N8.SA6 Stratford Waterfront South 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1		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.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/004	Neighbou rhoods							Blank	Blan k						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N8.SA9 Pudding Mill Electrical Substation: PUDDING MILL LANE 400KV 400Kv Underground Cable route: CITR4 - PUDM4 1 CABLE SECT 38		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/005	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N8.SA7 Rick Roberts Way 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1		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.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/006	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N7.SA2 Parcelforce 400Kv Underground Cable route: CITY ROAD - WEST HAM 400Kv Underground Cable route: PUDDING MILL LANE - WEST HAM 1 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1		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.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/007	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N7.SA1 Abbey Mills 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/008	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N5.SA4 Limmo ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1		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.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/009	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N4.SA4 Thameside West ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1		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. However, the following wording change is proposed to rectify typo in the plan: N2.SA4 Phasing and Implementation The potential impact of the existing on-site sewer and existing overhead transmission line route on design and layout should be taken into account at the preapplication stage through early engagement with Thames Water and National Grid. which is included in the modification table.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/010	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N4.SA1 Royal Albert North ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/011	Neighbourhoods							Blank	Blank						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N1.SA1 Beckton Riverside ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1		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.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/012	Neighbourhoods							Blank	No						Blank	[Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below. The following sites were identified in previous representations made by Avison Young on behalf of National Grid to the Draft Newham Regulation 18 Consultation in February 2023.] N13.SA3 Former East Ham Gasworks ZBH ROUTE: 275Kv Overhead Transmission Line route: BARKING - REDBRIDGE 1		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. However, the following wording change is proposed to ensure consistency across the plan: N13.SA3 Site Profile Utilities - Overhead transmission line route Design Principle The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site and the existing overhead transmission line route, and minimise the impact of noise from any required Pressure Reduction System on residential amenity. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/013	Neighbou rhoods							Blank	Blan k						Blank	Following a review of the Regulation 19 Consultation documents, the following proposed site has also been found to conflict with a National Grid asset. N11.SA1 East Beckton Town Centre ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1 A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.	We propose additions to the above site allocations and/or policies to include wording to the following effect: N11.SA1 East Beckton Town Centre “The development will include a strategy for responding to the NGET overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”	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: N11.SA1 Site Profile Utilities - Overhead transmission line route Design Principle The design and layout of the site should take account of the existing overhead transmission line route and risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Phasing and Implementation: 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. which is included in the modification table.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-046	Network Rail and London Continental Railways		Reg19-E-046/001	Neighbou rhoods		New Site													am writing on behalf of Network Rail (NR) and London Continental Railways (LCR) in respect of “Land to the South of Anthems Way, Stratford, E20 (“the Site”). We previously submitted representations in respect of the site through the ‘Call for Sites’ process, however the site was dismissed due to concerns over the impact of noise from the adjacent railway. Following further representation to the Draft Local Plan (Regulation 18), including the results of an independent ambient noise assessment (which concluded that the site was suitable for residential development) we noted the response below in the Regulation 18 Consultation Report, Appendix 20, page 875 (REF18-E-067/001/002); “The information submitted at Regulation 18 has been considered. Environmental issues regarding the site were highlighted but a further assessment of the site has concluded not to allocate this site for development because it is considered that the same outcomes could be achieved by other means, such as through the development management process ... The decision to not allocate the site does not prevent an application being made for the development” We welcome this response, and the acknowledgement that the environmental issues (including noise levels) of a residential scheme on this site can be managed through the development management process. We also welcome the positive confirmation that whilst the site has not been allocated, development of the site could be progressed through a planning application. We look forward to working with you in the future to bring forward this challenging site which has the potential to provide a high-quality, high-density, well-connected residential development which will make a significant contribution to local housing targets and local environment on one of the few remaining undeveloped plots of the Queen Elizabeth Olympic Park.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-046	Network Rail and London Continental Railways		Reg19-E-046/001a	Neighbou rhoods															[...]In summary: 1. Queen’s Market conforms with Newham’s key policies and aims 2. But the market’s attributes are not sufficiently recognised within the Plan. 3. Policy could not therefore support the protection / re-provision of the market, as is claimed in the Plan. This makes it not effective or deliverable and not based on robust evidence. 4. It is inconsistent with national policy. 5. The Plan should be remedied.		A change to this policy approach has not been made. We did not consider this change to be necessary as the objective of policies across the Local Plan is to protect the viability and vitality of all existing markets within Newham. Policy HS4 is therefore necessarily more broad, and market-specific context will be taken into consideration as and when planning applications are submitted. Policy N14 provides specific protection and opportunities for enhancement for Queen's Market, proportionate to the Council's aspiration for Green Street and known Council commitments to the market. The policies are in alignment with the NPPF para 90c, which requires LPAs to promote the vitality and viability of town centres in part by retaining and enhancing existing markets and, where appropriate, re-introduce or create new ones. The policy is positively prepared and justified by the findings and recommendations of the Retail and Leisure Study (2022), and the approach is supported by Newham's Markets Team. The Council is satisfied that the plan is sound.
Reg19-E-102	Network Rail		Reg19-E-102/004	General							Blank	Blan k						Blank	Engagement with Network Rail’s Asset Protection and Optimisation team A number of site allocations are located either adjacent to or in close proximity to NR owned land and operational railway infrastructure. As a result, potential Applicants looking to bring forward development in these locations will need to engage with NR’s Asset Protection and Optimisation (ASPRO) team at an early stage of the development process to ensure that the works can be completed without any risk to the operational railway. To start the process with our ASPRO team, the Applicant should use the Asset Protection Customer Experience (ACE) system found on NR’s Rail’s Asset Protection website (https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/). This website also provides more information about the Network Rail ASPRO team and the services they offer. If you have any questions regarding the NR’s response or wish to discuss any of the above matters further, then please do not hesitate to contact me.		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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/08b	General		N7.SA1 Abbey Mills					No	No						No	...In addition, the local plan had outlined Key Route through to the prime land location, and I strongly object as this proposal is impacting the future use of this privately owned land facility for the use by the community. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward site allocation]		A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/04	Neighbou rhoods															Finally the Authority supports the addition of a reference to the Regional Park within the site profiles identified below under the category Natural Environment Designation. N4.SA4 Limmo N4.SA5 Canning Town Riverside N7.SA1 Abbey Mills N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks N7.SA3 Sugar House Island		Support noted.
Reg19-E-174	Daniel Blaney		Reg19-E-174/003	Neighbou rhoods		N8.SA7 Rick Roberts Way													Rick Roberts Way and related sites Given the local and emerging national priority given to Social Rent, I am disappointed with the lack of explicit reference to higher affordable housing requirements in the site allocation for Rick Roberts Way and other areas following Stratford Waterfront consent (now known as East Bank). The UU requires the provision of 50% affordable housing, and that Rick Roberts Way is to provide the required number of affordable habitable rooms and tenure split to achieve the portfolio requirements. The UU also requires the delivery of a proportion of affordable housing prior to market sale units and the use of reasonable endeavours to pepper pot affordable housing within each development.	The contents of this UU should be explicitly referenced in the local plan to ensure affordable housing previously promised by an LLDC developer via s106 is delivered. In practical terms it means affordable housing should be much more than 50% of homes delivered on the RRW site. This must be written into the site allocation for Rick Roberts Way, to demonstrate the planning authority’s overarching priority of maximising homes for Social Rent.	A change to this policy approach has not been made. This change is not considered to be necessary as the obligations set out in the Unilateral Undertaking will transfer from the LLDC to the Council as local planning authority; the obligations the developer has committed to remain extant and should be complied with. Should the developer wish to amend any part of the planning obligation (the Unilateral Undertaking) this would need to be the subject to an application. Any application would need to be accompanied by a robust justification and would be thoroughly assessed including vigorous viability testing if needed. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/009	Neighbou rhoods							Blank	Blan k						Blank	Neighbourhoods (Part 2) As a general comment for the site allocations involving proposed bridge crossings (as noted earlier), they must be clear that any proposed crossing situated over navigable waterways ensures that the public right of navigation is maintained, that safe navigation can continue and that the PLA are consulted in the development of such proposals where these cross over areas of the PLA’s jurisdiction and/or landownership. Engagement should commence at an early stage so that amongst other matters, the height of any proposed bridge can be understood and relevant advice can be provided.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. This text states that bridge development should be discussed with the Port of London Authority at the earliest possible stage. The council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/031	Neighbourhoods								No							CONCLUDING REMARKS In conclusion, whilst we commend the Council for their production of this Draft Newham Local Plan, we have concerns regarding the soundness of the Draft Newham Local Plan given discrepancies within the evidence base.		Comment noted.
Reg19-E-178	Royal Docks		Reg19-E-178/045	Neighbourhoods							Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] Characterisation Study – Neighbourhood Design Principles The Characterisation Study is a design approach and series of recommendations – the use of it as a piece of evidence with which to judge any future applications should be on this basis – i.e.: that the proposals within it have not been tested for viability or commercial delivery. There is a risk of over reliance on the document given its extensive use throughout the Plan.		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 positively prepared. Newham Characterisation Study is the evidence base that has informed the Local plan's spatial strategy and 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 viability assessment which have helped informing the requirements for each site allocations. The Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/022	Neighbourhoods							Blank	Blank						Blank	Neighbourhood plans N4 Canning Town and N5 Custom House and N8 Stratford And Maryland and all other neighbourhood plans We believe that existing residents of the area are protected and supported to securely and affordably continue to live in the area.		Comment noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/009	Neighbourhoods		N2.SA4 Thameside West													Site Allocations • N2.SA4 – We support the inclusion of bridge crossings over the River Lea to Tower Hamlets and welcome the opportunity to work further with LB Newham to deliver these crossings.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/010	Neighbourhoods		N2.SA4 Thameside West													• N4.SA4 – We support the significant additional greenspace that is proposed on this site		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/011	Neighbourhoods		N2.SA4 Thameside West													• N4.SA4 – We support [the significant additional greenspace that is proposed on this site] and the new crossings of the railway line, which will improve connectivity for residents of Tower Hamlets.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/012	Neighbourhoods		N4.SA5 Canning Town Riverside													• N4.SA5 – We support the proposed bridge connections across the River Lea to Tower Hamlets		Support noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/013	Neighbourhoods		N4.SA5 Canning Town Riverside													• N4.SA5 – We support the [proposed bridge connections across the River Lea to Tower Hamlets], as well as the proposed greenspace along the riverfront		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/014	Neighbourhoods		N4.SA5 Canning Town Riverside													• N4.SA5 – We support the [proposed bridge connections across the River Lea to Tower Hamlets, as well as the proposed greenspace along the riverfront] and the improved crossings of the A13.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/015	Neighbourhoods		N7.SA2 Parcel for ce													• N7.SA2 – We support additional connectivity through the site and additional greenspace, which will benefit Tower Hamlets residents.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/016	Neighbourhoods		N7.SA2 Parcel for ce													We also support the height strategy for the site, which includes lower heights towards Three Mills and the Tower Hamlets boundary.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/017	Neighbourhoods		N7.SA3 Sugar House Island													• N7.SA3 – We support the proposed new bridge across the River Lea to Tower Hamlets		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/018	Neighbourhoods		N7.SA3 Sugar House Island													• N7.SA3 – We support [the proposed new bridge across the River Lea to Tower Hamlets] and the proposed greenspace along the river.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/019	Neighbourhoods		N8.SA9 Pudding Mill													• N8.SA9 – We support the proposed new bridge across the River Lea to Tower Hamlets.		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/104	Neighbourhoods															14 Neighbourhood N8 Stratford and Maryland 14.1 St William continues to support the designation of the N8 Stratford and Maryland neighbourhood, and in particular the inclusion of the Rick Roberts Way site allocation (N8.SA7) which is one of several site allocations included within this proposed neighbourhood area. Vision 14.2 St William therefore remains supportive of the vision for this area which seeks to create a safe, fair and lively neighbourhood with a mix of uses that recognise its unique and important role in both the Borough and for London. A high level of growth that will deliver new housing is also strongly supported.	[Appendix 14: – N8 Stratford and Maryland Neighbourhood – Suggested amendments]	Support noted.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/117	Green and Water Spaces		N13.SA3 Former East Ham Gasworks												Designation of MOL 15.10 London Plan (‘LP’) Policy G3 affords MOL the same status and level of protection as Green Belt. It is therefore subject to national policies on proposals affecting the Green Belt at paragraph 152 to 156 of the Framework. 15.11 LP Policy G3 confirms that boroughs should designate MOL by establishing that the land meets one of the following criteria: § Criteria A: it contributes to the physical structure of London by being clearly distinguishable from the built-up area. § Criteria B: it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. § Criteria C: it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. § Criteria D: it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. 15.12 A review of the MOL has been undertaken, which has informed the Regulation 19 Draft Local Plan. The MOL within the Site is identified as MOL Area 21 and whilst the boundary has been reconfigured, the size of this area remains the same. The Newham Metropolitan Open Land Review (2024) assesses the Site as follows: § The overall parcel meets Criteria A § The parcel does not meet Criteria B § The parcel does not meet Criteria C § The parcel meets Criteria D. 15.13 We conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:- § Criteria A: The land is not clearly distinguishable from the built-up area owing to the scale and proximity of the gasholder (a tall building) located geographically within the centre of the site. The site is enclosed on all sides by residential development, railway infrastructure and, to the east the elevated A406 North Circular Road. Both the railway and the north circular dissects the site from further MOL to the north. An electricity pylon is located along the eastern edge alongside the A406. Cumulatively these features detract from an open space setting and contribute to the sense of a built-up area. § Criteria B: The site is closed to the public and is inaccessible and impermeable. It does not include open air facilities for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. § Criteria C: The site does not contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. 15.14 There is green space allocated to the north and south, but these are dissected by the Overground, District Line and Hammersmith and City Lines and Watson Avenue. Whilst on plan, the site appears to link through to other parcels	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.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			and green corridors in reality these parcels and corridors are separated by significant physical infrastructure. None of criterion AC are addressed. 15.15 Policy G3 part (c) allows for alterations to the boundary of MOL, in consultation with the Mayor of London, and adjoining boroughs. These changes should be undertaken in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL.		
Reg19-E-200	London City Airport		Reg19-E-200/049	Neighbourhoods															Annex 3 LB Newham Draft Local Plan – Regulation 19 Review Safeguarding Comments Should you have any questions, we would be more than happy to meet and work through each or any of the below allocations. Note that the following allocation specific comments are in addition to the overarching comments contained in our suggested safeguarding changes for Policy T5. Both sets of changes should be made in order to provide clear communication of the height of airspace requirements for the airport.		Comment noted
Reg19-E-204	Historic England		Reg19-E-204/003	Neighbourhoods							Blank	Blank						Blank	[We note the various amendments made to the draft Plan in response to the previous public consultation in 2023. In particular, we strongly welcome the amendments addressing our comments including those on] a number of the draft site allocations, specific reference to Heritage at Risk and in relation to the way the transition between ‘conserve’ and ‘transform’ areas is treated in certain parts of the borough.		Support noted.
Reg19-E-217	LLDC		Reg19-E-217/007	Neighbourhoods															[From 1. 040920 LBN LP Reg 19 response Cover Letter] Neighbourhoods and Site Allocations We welcome some of the updates made to the Site Allocations for LLDC’s sites and the incorporation of development principles to more accurately reflect extant planning permissions and feasibility studies. However, there remain a number of discrepancies and inaccuracies, including building heights, which could potentially undermine the deliverability of these sites and should therefore be corrected. We set these out in Appendix 1 [please see Appendix 1 of the response] together with the proposed changes required to the following Site Allocations: • Stratford Station; • Bridgewater Road; • Pudding Mill; and • Rick Roberts Way.		Comment noted. Individual responses are provided to the proposed changes outlined in your representation.

Neighbourhoods Comments to the full Regulation 19 Representations																			
Reg19-E-217	LLDC		Reg19-E-217/008	Neighbourhoods														[From 1. 040920 LBN LP Reg 19 response Cover Letter] In addition, there are a number of site allocations for which we have previously made representations and consider should be included in the Local Plan. These are set out below. Three Mills Site Allocation: The LLDC Local Plan includes a site allocation for the Three Mills Studios area which promotes appropriate development in the context of its heritage status to support long-term use of the studios and the historic buildings. It is disappointing that this site allocation is not included in the draft Newham Plan and as set out in our response to the earlier Regulation 18 consultation, it would be helpful to understand the rationale for deletion of this site allocation given the strategic importance of the site within the Borough and London. Stadium Island Site Allocation: As you will be aware, the LLDC previously wrote to the Council requesting a Local Plan Site Allocation to reflect future development potential associated with the London Stadium. It is noted that this has not been included within the Regulation 19 draft of the Local Plan. We continue to consider the inclusion of such a site allocation as an essential aspect of helping to secure the principle of such development here and have attached the previous correspondence on this at Appendix 2. [Please see no. 4, 5, 6 attachments - which refer to Stadium Island Site Allocation] Can not see Appendix 2 in representation. Stratford Waterfront South - the Aquatics Triangle Site Allocation: We also note that the Aquatics Triangle site has not been included as a Site Allocation, despite this being identified as a significant site in LLDC's development programme and being put forward for mixed-use development in its Local Plan Call for Sites in December 2021 and made representations to the Regulation 18 consultation. Development of the site would improve the setting and levels of activity along this edge of Carpenters Road and help activate its frontages. The reconfiguration of the current open space area, with compensatory provision at the southern end of the Aquatics Centre would also be beneficial to its setting within Queen Elizabeth Olympic Park. We therefore consider it is important to have a Site Allocation to capture these development principles and reflect the development potential for residential-led development, including affordable housing. Bow Goods Yard Site Allocation: The LLDC Local Plan has a site allocation which, while recognising the designation of the site as Strategic Industrial Land (SIL), also promotes modernisation and consolidation of the rail and industrial uses within the site and allows consideration of future release for non SIL uses in the future. This is partly intended to help secure the infrastructure that would enable this change, including a bridge connection to Bow West Goods	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. This comment has been subject to further discussion with LLDC and this is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			Yard, which would enable site related industrial traffic from Bow Goods Yard to be directed away from the new community developing at Pudding Mill and the nearby Bobby Moore Academy schools. No site allocation has been included in the draft Newham Local Plan and this effectively means that the existing site allocation would be deleted before any development of the site, and the infrastructure that would support development, has come forward. The LLDC's earlier responses to the Newham Local Plan Call for Sites and Regulation 18 consultations identified this as a site allocation that it considers should be carried forward into the new Newham Local Plan. Although subject to a current planning application which has yet to be determined, a site allocation for the site is still considered to be important to promote positive planning for the future of the site, including potential enclosure of the current open storage and redirection of Heavy Goods Vehicle (HGV) traffic that would result in significant environmental and townscape benefits alongside delivery of high quality buildings, a positive frontage to Marshgate Lane and enhancement of the River Lee waterside area and make an effective link to improvements at Bow West SIL to the west.		
Reg19-E-226	NHS North East London		Reg19-E-226/008	Neighbou rhoods							Blank	Blan k						Blank	Evidence Base Comments Area Profile and Population Forecasts NHS NEL consider that the evidence base would benefit from an 'Area Profile' document which clearly sets out an analysis of age, tenure, housing benefit, household size and composition, children in household, types of accommodation, ethnicity, working status, qualifications, income, disabilities, access to vehicles, length lived in area, satisfaction with area, future plans, work and education, shopping and social/community facility.	The inclusion of an 'Area Profile' would ensure that all data relating to population is contained within one document which would enable more constructive discussions with developers when seeking contributions through planning obligations. It would also help target the wider determinants of health and contribute to meaningful community wealth building at a neighbourhood level. NHS NEL acknowledge that some of this information is contained within a range of existing evidence base documents but as outlined above there are significant benefits to the delivery of the Local Plan by ensuring that an Area Profile forms part of the evidence base.	Comment noted. This comment has been subject to further discussion with NHS North East London and a satisfactory resolution has been found. Both parties are satisfied that the plan remains sound without these changes. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Reg19-E-238	Environment Agency		Reg19-E-238/070	Neighbou rhoods															New site allocations: The council appears to have allocated two new sites which are N11.SA3 (Alpine Way) and N2.SA5 (Excel Western Entrance). Both of these sites have environmental constraints which fall under our remit. These environmental constraints include: • Flood zone 3 & tidal breach • Secondary aquifer		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-238	Environment Agency		Reg19-E-238/071	Neighbourhoods															We believe that the site allocations document presents an opportunity to encourage developers to undertake environmental improvements. As part of this response we have provided an Excel sheet which contains a list of aspirational ecological improvements (known as mitigation measures) for the Tidal Thames along the banks through the London Borough of Newham Attachment [LB Newham Tidal MMs] We suggest that these measures are implemented where they are present on an allocated site.		The change is not considered to be necessary as the list of aspirational ecological improvements for the Tidal Thames were provided to us too late to add this 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.
Reg19-E-238	Environment Agency		Reg19-E-238/072	Neighbourhoods															In our Reg 18 response we said that ‘The following four site allocations fall within Source Protection Zone 1 (SPZ1): N8.SA1, N8.SA2, N8.SA5 and N15.SA2’. We are pleased to see that SPZ1 has now been identified in the ‘Natural environment Designations’ for these 4 sites.		Comment noted.
Reg19-E-238	Environment Agency		Reg19-E-238/073	Neighbourhoods															Areas in SPZ1 are the catchment areas for sources of potable, high quality water supplies usable for human consumption. As such, sites within SPZ1 are particularly sensitive with respect to groundwater. Additional constraints will be placed on development proposals in these areas. With respect to the Environment Agency’s Approach to Groundwater Protection, the following position statements would apply: • D1-General principles-all storage facilities • D2-Underground Storage (and associated pipework) • D3-Subwater table storage • G2- Sewage Effluent Discharges within SPZ1 • G4- Trade effluent and other discharges within SPZ1 • G8-Sewage pipework • G13- Sustainable Drainage systems • N7- Hydrogeological risk assessment • N8-Physical disturbance of aquifers in SPZ1 Please note, we would recommend planning conditions for any piled foundation proposals for allocated sites within SPZ1. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment we would object to the use of piled foundations. For allocated sites in close proximity to potable groundwater abstractions, we would strongly advise that the abstraction licence holder are also consulted with respect to piled foundation proposals.		Comment noted. Please note that implementation text CE1.2 does require a Foundation Works Risk Assessment (FWRA) for sites where piled foundations are proposed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-238	Environment Agency		Reg19-E-238/074	Neighbou rhoods															Finally we have attached an excel document which contains our aspirational ecological improvements (known as mitigation measures) for the Tidal Thames along the banks through the London Borough of Newham. Some of these ecological improvements may fall on allocated sites.	Where an improvement falls on an allocated site we would like the council to outline the improvement as a requirement in the site allocations document.	Comment noted.
Reg19-E-244	One Newham		Reg19-E-244/031	Neighbou rhoods															Overall it seems that the plans have taken limited account of what the ground reality is and what local residents want and need and having lots of aspirational elements with no clear delivery plan and no source of funding (which might have come with a closer link to the Albert island EZ redevelopment - if that ever happens!).		Comment noted.
Reg19-E-244	One Newham		Reg19-E-244/032	Neighbou rhoods															It is a shame that the maps include obvious errors (even if they are stylised indication layout plans) as having key routes that run to concrete walls! It undermines confidence in the entire document and demonstrates a lack of knowledge about and connection with the actual area.		Comment noted. 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.