

## James Scantlebury

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**From:** Hassan Ahmed <[REDACTED]>  
**Sent:** 30 August 2024 16:57  
**To:** Ellie Kuper Thomas  
**Cc:** Local Plan; [REDACTED]  
**Subject:** Re: Mayor's response to Newham's Local Plan Regulation 19 consultation  
**Attachments:** FINAL Newham Mayors response Local Plan Reg 19.pdf

Hello Ellie

Please find attached the Mayor's response to your Local Plan Regulation 19 consultation.

Would you be so kind as to confirm receipt of this email for our records?

As always, please do reach out to me if you want to discuss anything that's in the letter.

Regards

Hassan Ahmed

Team Leader, London Plan and Strategic Planning Team



My pronouns are he/him

london.gov.uk  
[REDACTED]

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**Ellie Kuper Thomas**

Planning Policy Manager  
Planning and Development,  
Newham Dockside,  
1000 Dockside Road,  
London  
E16 2QU

**Department: Planning**

Our reference: LDF25/LDD01/LP03/HA01

Date: 30 August 2024

By email: [REDACTED]  
[localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)

Dear Ellie,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local  
Development) (England) Regulations 2012**

**Re: Third consultation – Draft Submission Local Plan (Regulation 19)**

Thank you for consulting the Mayor of London on the London Borough of Newham's (LBN's) proposed Draft Submission Local Plan (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier Newham Local Plan 2023-2038 (Regulation 18) consultation on 20 February 2023 (Ref: LDF25/LDD14/LP02/MJ01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response. The LP2021 was formally published on the 2 March 2021, and forms part of LBN's Development Plan and contains the most up-to-date policies.

## General

The draft Local Plan is underpinned by seven broad objectives. These ambitions include a healthier Newham, ageing well, and people friendly neighbourhoods with green and clean streets. The objectives are very closely aligned with the Mayor's Good Growth objectives, especially GG1 building strong and inclusive communities and GG3 creating a healthy city.

The Mayor recognises that town planning functions for the London Legacy Development Corporation (LLDC) will be handed back to respective boroughs this year including to Newham. The draft Plan takes this into consideration by strategically planning for that part of the borough.

However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan for two reasons:

- firstly, the intention to alter the borough's housing targets prior to 2029 so that it is lower than the one established in the LP2021; and
- secondly the proposed approach to affordable housing.

Further detail on these is provided in the subsequent sections of this letter.

## Housing

LBN's housing target is set out in Table 4.1 of the LP2021 is for the delivery of 32,800 new homes between 2019 and 2029. In addition to that, LBN is also absorbing the LLDC housing target component in their area. Combined, this means that LBN's housing target is 47,600 new homes for that period, which equates to an average of 4,760 a year.

For LBN's entire Plan period, 2023-2038, it is the intention to deliver up to 53,784 new homes. LBN's combined LP2021 housing target for the period 2023-2029, taking account of the shortfall in delivery prior to the start of the Plan (2019-2023) is for the delivery of just under 36,000 homes. Once that target has been met the remaining target would be to deliver almost 18,000 new homes up to 2038 which represents half of the current annual target. The proposed drop in housing target is considered significant.

LBN's evidence in the Site Allocations and Housing Trajectory Methodology 2024<sup>1</sup> anticipates lower than expected delivery against the LP2021 housing target which would amount to shortfall of 16,472 homes by 2029. In these situations, the Mayor considers that LBN should demonstrate that they have exhausted all suitable options for meeting the housing target by 2028/29. Where it has been clearly demonstrated that the 10-year target will not be met by 2028/29, boroughs should add the shortfall to the target identified beyond 2028/29 and LBN should clearly demonstrate how that shortfall can be delivered in the first few years after 2028/29. LBN's evidence indicates that the shortfall of delivery stems from delays to the delivery of allocated sites within the adopted Local Plan and that LBN can make up the shortfall relatively quickly by 2033/34.

Instead of following the approach set out above, the intention is to lower the borough's housing target in a stepped manner as outlined below - resulting in a target which is *lower*

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<sup>1</sup> <https://www.newham.gov.uk/downloads/file/7707/site-allocation-and-housing-trajectory-methodology-july-2024>

than the one currently in the LP2021 for the period to 2029 (of 4,760 homes per year up to 2029).

- 2023 – 2028 - 2,974 new homes
- 2028 – 2033 – 3,836 new homes
- 2033 – 2038 – 3,475 new homes

LBN should take into consideration that paragraph 0.0.21 of the LP2021 is clear that *“The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures...”*

Furthermore, it is important to note that the LP2021 does not meet London’s identified housing need and therefore the overall amount of housing required annually should not be expected to reduce beyond 2029. It is also noted that proposed changes to national policy are likely to mean a significant increase in London’s overall housing need figure - the Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context (of increased need) would be a useful consideration when planning for housing beyond 2029. LBN should also be aware that the recently published national draft Local Housing Need figures will not form borough new housing targets which will be different.

Notwithstanding the fact that the shortfall is added to LBN’s target post 2029, which is accepted in principle, the Mayor has concerns that the net target post 2029 is significantly lower at 1,980 per annum, once the shortfall is removed. In addition, the Mayor considers that the intention to lower the borough’s housing target prior to 2029 to below the one set out in the LP2021 is not in general conformity with the LP2021. A failure to deliver against the LP2021 housing target compromises the implementation of the LP2021 as a whole.

LBN should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBN’s small sites housing target is set out in Table 4.2 of the LP2021 to deliver 380 new homes a year. However, between 2019 and 2023 LBN’s small sites delivery has averaged 284 new homes a year, which is lower than the target. LBN is advised to follow the guidance set out in Policy H2B by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG<sup>2</sup>. Small sites should be considered as a valuable source of housing delivery and should be capitalised to contribute towards meeting the boroughs housing target.

### **Affordable housing**

The Mayor notes that the approach to affordable housing has changed since the Regulation 18 consultation. At that time, it was proposed to follow the Mayor’s threshold approach at the levels set out in Policy H5 of the LP2021.

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<sup>2</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/small-site-design-codes-lpg>

The intention now is to apply the Mayor's threshold approach but to set the threshold at 60 per cent which is notably higher than the Mayor's strategic target of 50 per cent and the threshold is to be applied to all residential schemes of ten or more units.

Within this, LBN's intention is to deliver 50 per cent of housing as social rented housing and 10 per cent as affordable home ownership. The proposed tenure split therefore works out as 83/17 in favour of social rent housing.

Where residential proposals cannot meet these requirements, they will be viability tested.

The thresholds set in Policy H5 of the LP2021 were informed by viability testing. For privately owned land, the 35 per cent threshold is set at a level that has proven effective at securing affordable housing. The 2022 Annual Monitoring Report<sup>3</sup> illustrates that 84 per cent of all strategic applications provided at least 35 per cent affordable housing, representing an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable rooms.

While the delivery of affordable housing in London is a key priority for the Mayor, we are very concerned that setting the threshold at 60 per cent would actually reduce the delivery of affordable homes in practice and would result in larger numbers of residential planning applications not being able to meet the threshold.

Indeed, the Local Plan Viability Report<sup>4</sup>, published as part of the evidence base, does not demonstrate that most sites or typologies tested would be deliverable with a 60 per cent affordable housing requirement.

This would mean more proposals following the Viability Tested Route (VTR), which undermines the threshold approach, takes longer to determine planning applications when compared with Fast Track Route (FTR) schemes, and overall, provides less affordable housing. To illustrate this point, on average, schemes that were referable to the Mayor that followed the FTR provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. The approach would also result in a lack of certainty when acquiring land due to the lack of consistency in affordable housing provision from site to site.

Furthermore, applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.

As such there is a significant risk that the borough would secure fewer affordable homes through the proposed blanket 60 per cent requirement than could be achieved through the 35 per cent and 50 per cent thresholds set out in the LP2021.

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<sup>3</sup> [https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021\\_22%20%28final%29%20%281%29.pdf](https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021_22%20%28final%29%20%281%29.pdf)

<sup>4</sup>

[file:///C:/Users/hassa/Documents/Work%20%20Related/Newham/Reg%2019/evidence/Newham\\_Local\\_Plan\\_Reg\\_19\\_viability\\_report.pdf](file:///C:/Users/hassa/Documents/Work%20%20Related/Newham/Reg%2019/evidence/Newham_Local_Plan_Reg_19_viability_report.pdf)

We note that Policy H3 refers to review mechanisms set out in Policy BFN4, but these have not been set out in the draft Plan and their inclusion would be beneficial and useful.

The proposed tenure split also diverges from LP2021 Policy H6 which makes it clear that the tenure requirement for affordable housing should be 30 per cent each for low cost rent and intermediate housing products and the remaining 40 per cent should be determined by boroughs. LBN's proposed approach does not meet these requirements by requiring an 83/17 split in favour of social rented housing. Again, this is likely to mean that relatively few residential applications will be able to meet these requirements resulting in even more schemes having to take the Viability Tested Route.

There are also additional pressures / risks to the threshold approach and the delivery of affordable housing with the proposal that 40 per cent of all new homes are to be family homes containing 3 or more bedrooms.

Overall, this divergence from the approach set out in LP2021 Policy H5 and Policy H6 is significant and for that reason it is the Mayor's opinion that the proposed approach to affordable housing is not in general conformity with the LP2021.

### **Gypsy and Traveller accommodation**

Policy H10 of the draft Plan safeguards an existing Gypsy and Traveller site in the borough and sets out broad criteria for new sites. To be consistent with LP2021 Policy H14, LBN should set out the borough's ten year pitch requirements and plan to meet those needs. The Mayor is finalising work on the London-wide Gypsy and Traveller Accommodation Needs Assessment. Until complete, LBN should rely on its latest evidence which indicates a need for 23 pitches. It should be made clear whether the existing Gypsy and Traveller site has capacity to meet identified need over the Plan period. If not, LBN will need to plan to meet this.

### **Industrial capacity**

Throughout the draft Plan there are many instances where the generic term 'employment uses' is used. This term blurs the necessary distinction between industrial, office and other commercial activities and their respective Use Classes. The draft Plan should be amended accordingly so that the distinction is recognised, with priority given to those vital uses which the borough can control / support which fall outside Use Class E.

Policy J1 establishes a strategic need to deliver 335,000sqm of industrial floorspace up to 2038. This clarity is welcomed and would enable LBN to broadly plan to meet their industrial needs. However, within this LBN should establish how much is for Class B uses and then focus on protecting them and promoting their intensification in terms of floorspace capacity.

While Policy J2 broadly expects all developments in Strategic Industrial Locations (SIL) and Local Industrial Land (LIL) (equivalent to the LP2021's Locally Significant Industrial Land designation) to intensify industrial site use to deliver net increases in industrial floorspace -

which is welcomed - it is clear in the evidence<sup>5</sup> that some sites have been identified which have greater potential for industrial intensification over others. These sites would benefit from being identified in the draft Plan and being supported either through masterplanning or through allocations. The evidence suggests a latent capacity to deliver increases in industrial capacity amounting to approximately 352,000sqm. The intention should be to take a more proactive approach towards meeting the borough's industrial need.

The draft Plan should also include a clear intention to thoroughly monitor industrial capacity over the life of the Plan to be consistent with the approach in Policy E4C of the LP2021. This should include a focus on monitoring Class B uses to ensure this type of capacity is increased to meet established identified need. Monitoring should be set against the evidence of potential capacities established in the evidence for specific industrial sites.

The draft Plan proposes to reconfigure some of its designated industrial land. The most significant of which is the proposed intention to release the southern part of the British Gas / Cody Road SIL. However, this will be offset by the proposed designation of new SIL on an adjacent site at Bidder Street. The reconfiguration would result in a net gain of 0.26ha of SIL. For this reason, the proposed reconfiguration appears to be acceptable but should focus on accommodating Class B uses.

LBN intend to release Sugar House Lane / Stratford High Street LSIS from its industrial designation through the draft Plan and this should be made clearer. If there is existing Use Class B capacity within the area this should be monitored and reprovided or maintained.

### **Tall buildings**

The draft Plan's proposed definition of a tall building meets the requirements of Policy D9A and sets it at 21m.

The draft Plan also meets the requirements of Policy D9B. LBN should note that Policy D9 specifically uses the term 'appropriate building heights'. This implies some flexibility which could include a range of 'appropriate building heights'. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone, if that is indeed what the borough wishes to do.

Maximum building heights could be helpful in situations where an absolute is required and necessary. For instance, to prevent the development of tall buildings from obstructing one of London's strategic views, as set out in the London View Management Framework (LVMF), or where maximum building heights have been set by the Civil Aviation Authority. Where the draft Plan uses the term 'maximum' building heights the term 'appropriate' building heights should be used instead, in accordance with the advice set out above.

There are two strategic LVMF views that intersect with the borough, these should be included in the borough's Policies Map and within the draft Plan to provide clarity.

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<sup>5</sup> <https://www.newham.gov.uk/downloads/file/4966/lb-newham-employment-land-review-july-2022->

## **Air quality**

LBN has five air quality focus areas, which are set out in Figure 9.1 of the LP2021. This should be made clear in draft Policy CE6. Development proposals in these areas should demonstrate that design measures have been used to minimise exposure to poor air quality and this should be reflected in relevant site allocations.

## **Viability**

Policy BFN4 sets out the borough's proposed priorities in situations where developments are unable to meet all policy requirements. Part 3 of the policy sets out the borough's priorities in the following order - affordable and family housing, local access to employment and training and the delivery of required infrastructure. The approach is not aligned with the approach set out in Policy DF1 part D of the LP2021, which makes it clear that in such situations priority should firstly be given to affordable housing and necessary public transport improvements. The policy should be amended accordingly so that it is aligned with Policy DF1 of the LP2021.

## **Transport**

The Mayor welcomes the continued support for public transport and active travel improvements, including the potential DLR extension and potential major project at Stratford station. Also welcomed is the commitment to a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach. The requirement for all development to be car free is strongly supported and the addition of references to locally specific mode share targets and the Mayor's Vision Zero road safety objective is noted and welcomed too.

## **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.

| Site/s  | Comments  |
|---|---|
| N2.SA1 – Land at Silvertown Quays, North Woolwich Road. | 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. |
| N2.SA2 – Land at Knights Road                           | The site contains waste sites and non-designated industrial sites. The  |



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| and Bradfield Road.                      | 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.   |
| N2.SA3 – St Mark's (Connaught Riverside) | The allocation is clear that it is home to a designated industrial area (LSIS) in the site plan and as such LBN should note that Policy E6 of the LP2021 applies. The focus should be to prioritise Class B uses as these are not subject to permitted development rights. 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. |
| N4.SA2 and N4.SA3                        | 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.  |

### Next steps

I hope these comments positively inform the ongoing preparation of LBN's Local Plan. We continue to be keen to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at [REDACTED].

Yours sincerely,

[REDACTED]

Lucinda Turner

**Assistant Director of Planning**

Cc:

[REDACTED]  
[REDACTED]  
[REDACTED]



## Annex 1 – Transport for London Response

Transport for London  
Spatial Planning

8th Floor  
5 Endeavour Square  
London E20 1JN

Phone [REDACTED]  
tfl.gov.uk

30 August 2024

### Consultation on Newham draft local plan (Regulation 19)

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Newham local plan.

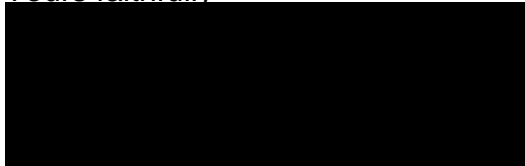
The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We welcome the positive changes made to the Local Plan in response to our comments at the Regulation 18 stage of consultation. We also welcome the continued support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions. We are pleased to note the commitment to a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach. We strongly support the requirement for all development to be car free and also welcome the addition of references to locally specific mode share targets and the Mayor's Vision Zero road safety objective.

However, there are a few outstanding issues that we believe need to be addressed to ensure soundness and consistency with the London Plan including a more positive approach towards securing contributions towards transport improvements. 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.

We have updated the detailed comments we made at the Regulation 18 consultation reflecting changes made to the Regulation 19 version of the Local Plan. These are included in the final column of the table in appendix A, below. Appendix B in a separate attachment contains plans showing TfL infrastructure.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Josephine Vos

**London Plan and Planning Obligations Manager**

Email: 





## Appendix A: Detailed comments and suggestions for amendments – updated to reflect changes to the Local Plan

| Policy  | Regulation 18 response   | Regulation 19 updated response  |
|---|--|---|
| BFN1: Spatial Strategy                                    | <p>We welcome in part 1 of the policy the strategic role the Royal Docks and Beckton Riverside Opportunity Areas have and the clear support for the delivery of new DLR stations and a redesigned Stratford station to support new housing and growth.</p> <p>We suggest amending the wording of part 1aii, replacing 'supported by an extension to the DLR' with '<b>unlocked by an extension to the DLR</b>'.</p>  | <p>We welcome the amended wording in part 1ai in relation to the DLR extension.</p>   |
| BFN2: Co-Designed Masterplanning                          | <p>TfL has welcomed this approach particularly through the development of existing and new transport infrastructure. We suggest further explanation in the justification text of complex sites with the need for transport improvements or new transport provision. For these, the applicant should evidence how an integrated approach to the delivery of transport infrastructure has been considered and the existence of arrangements to ensure its timely delivery to benefit the future and existing population.</p> | <p>We welcome the new wording in the implementation text of BFN2.2.</p>   |
| BFN4: Developer Contributions and Infrastructure Delivery | <p>In part 1.b. and part 3 necessary public transport improvements should be prioritised alongside affordable housing to ensure consistency with London Plan Policy DF1D which states that '...applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements...' In many cases development may not be viable or 'workable' without the necessary public transport and active travel improvements to provide access, connectivity and capacity.</p>        | <p>Although there have been some minor amendments to the wording in the implementation text of BFN4.3, this is not sufficient to ensure consistency with London Plan DF1D which specifically identifies necessary public transport improvements as a priority alongside affordable housing. We recommend that part 1b is amended to read 'as necessary, enter into section 106 agreements to provide affordable housing, <b>necessary public transport improvements</b> and any other requirements to mitigate impacts arising' and part 3a is amended to read 'affordable and family housing <b>and necessary public transport improvements</b>'. In the implementation section the second paragraph of BFN4.1 should be amended to read: 'Section 106 planning obligations will be sought for affordable housing, <b>necessary public transport improvements</b> and additional contributions...' This amendment is necessary to ensure soundness and consistency with the London Plan.</p> |
| D2: Public Realm Net                                      | <p>We welcome the requirement in part 2.b. which includes 'integrating the</p>   |   |

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| Gain                         | <p>highways and public rights of way network directly adjacent the site into the site design so it can be considered together, through the application of the Healthy Streets Framework and London Plan (2021) Policy D8, and any relevant local design guidance and code. However, the London Plan Policy reference should also include Policy T2: Healthy Streets.</p> <p>In part 3 we recommend that reference is made to the findings of an Active Travel Zone Assessment which can provide an evidence-based justification for public realm improvements, for which planning obligations should be secured. The policy could also provide specific encouragement for reductions in and rationalisation of on and off-street car parking to improve the public realm and make it more inclusive.</p> <p>In DT2.3 and DT2.4 we welcome the prioritisation of active travel projects including Low Traffic Neighbourhoods, Healthy Streets and School Streets.</p> | <p>We welcome the changes made to the wording of D2 to refer to Active Travel Zone Assessments and to provide a link to relevant TfL guidance, confirmation that car parking space is excluded from public realm net gain and the addition of the reference to London Plan Policy T2 in the policy links.</p>   |
| HS7: Delivery Led Businesses | <p>We support the requirements for new or intensified dark kitchens, dark shops and micro fulfilment centres to provide accessible, safe facilities for drivers/couriers, including sheltered waiting space, toilets and secure cycle parking and to be supported by an adequately resourced Servicing and Travel Plan which aims to maximise deliveries by bike or cargo bike and support sustainable travel consistent with policies T3: Transport Behaviour Change and T4: Servicing a Development.</p>   | <p>We reiterate support for the requirements in part 3 b and c and part 4 d and e which are further explained in the implementation section.</p>  |
| T1: Strategic Transport      | <p>We welcome the approach of this policy which is broadly in accordance with London Plan Policy T3.</p> <p>It would be helpful if part 1.b.iii. were expressed as ‘Buses—priority measures, <b>stops, stands (including drivers’ facilities), stations and garages</b> and bus depots’. This is clearer than the existing reference to bus depots and includes street infrastructure that may need protection from the impacts of development. This point should also be reflected in T1.1 Implementation under point 4 – Buses.</p> <p>It would be helpful if section T1.1 could also refer to projects and interventions that support delivery of TfL’s Bus Action Plan</p> <p>We suggest that the word ‘negatively’ is inserted at the end of the third sentence in T1.1. Alternative wording could be <b>‘should demonstrate that</b></p>   | <p>Although we welcome the change to wording in part 1.b.iii and T1.1 – Buses, we recommend that the word ‘depots’ is replaced by ‘garages’ as set out in our Regulation 18 representation because this is the term more commonly used by TfL.</p> <p>We note that no change has been made in response to this point.</p> <p>We welcome revised wording in the second sentence in T1.1 to address this point.</p> |

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|  | <p><b>negative impacts on the strategic transport infrastructure are minimised.'</b></p> <p>In part 2.a. it should be clarified that strategic transport schemes should be designed to 'increase public transport mode share <b>and active travel</b>' because some major improvements may be aimed primarily at increasing cycling and walking.</p> <p>We welcome the reference to planning obligations being used to deliver strategic transport improvements, although this may be better included as part of the core policy.</p> <p>Reference to step-free access at existing/new infrastructure would be welcomed, although this will need to be funded through planning obligations or other funding sources because TfL is not able to commit funding at the current time.</p> <p>We welcome the support expressed in paragraphs 3.252–3.254 for a potential DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford station and the intention to protect land and access to ensure delivery of the projects. Mention could also be made of other potential new/improved stations linked to development proposals. Support for these projects could be made stronger by referencing them in policy T1. The justification text in 3.252 outlines some of the benefits associated with these projects but it could also refer to unlocking and supporting growth. The justification text could also outline the role in which strategic transport provision enables better planning for wider and more local transport such as good interchanges with other public transport (including buses and cycling). This could also refer to TfL's Interchange Best Practice Guidelines.</p> <p>The reference to safeguarded land, as well as its potential release where appropriate, is welcomed. This should be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. It would be helpful in the Implementation section to refer to the LPG as it provides guidance on protecting transport infrastructure.</p> <p>Rather than referring to the London-wide target, the Monitoring section</p> | <p>We welcome the addition of a reference to active travel in part 2.a.</p> <p>We note that no change has been made to address this point.</p> <p>We note that no change has been made to address this point.</p> <p>We note that no changes have been made to the policy to address these points.</p> <p>We welcome the addition of a reference to the LPG in T1.1 – Implementation.</p> <p>We welcome amended references to the 83 per cent target in the transport introduction and the monitoring section. However it should be noted that this local target for Newham is not set in the Mayor of London's Transport</p> |
|--|---|---|

|                     |  |  |
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|                     | should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.  | Strategy but has been agreed through the borough's Local Implementation Plan.  |
| T2: Local Transport | <p>We welcome the requirement for development to support 15-minute neighbourhoods, improve air quality, maximise health benefits, reduce carbon emissions and deliver sustainable growth, and points a–f to achieve this.</p> <p>We welcome support for the delivery of Low Traffic Neighbourhoods, School Streets and Healthy Streets.</p> <p>We support the requirement for development to provide or contribute towards wayfinding, including Legible London and TfL cycle hire provision as part of a wider London network.</p> <p>The Planning Obligations section also identifies contributions towards local transport and public realm improvements. For clarity, it would be helpful to include this as part of the core policy.</p> <p>We support the requirement in T2.1 that 'Development should show that the design of the scheme prioritises walking, cycling and public transport and discourages vehicle use' and measures set out to achieve this.</p> <p>We look forward to providing input to the emerging Sustainable Transport Strategy to include a Walking Strategy and a Cycling Strategy. These documents should identify the existing route networks, barriers and gaps in provision, and proposals to address those barriers/gaps so that they provide an evidence base for seeking contributions from development.</p> <p>In the second paragraph of T2.1 we would like to see additional wording inserted as follows: '<b>Development should enhance the attractiveness of public transport services. Measures should seek to enhance the reliability, accessibility and ease of interchange of public transport services.</b>'</p> <p>Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.</p> | <p>We welcome the inclusion of additional wording in T2.1 to address this point.</p> <p>We welcome the amended references to the 83 per cent target throughout the document.</p> |
| T3: Transport       | We strongly support the requirement in part 1 that all development will be   | We welcome clarification relating to Blue Badge parking.   |

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| Behaviour Change | <p>car free, which is consistent with London Plan Policy T6. It may be helpful to clarify that Blue Badge parking is an exception for both residential and commercial uses. Part 1.b. which states that 'Car parking for commercial or industrial uses must be the lowest justified quantity' could be seen as inconsistent with the commitment for development to be car free. For consistency with the London Plan, it may be better to state that 'Where justified for operational purposes, a very limited amount of vehicle parking may be provided for commercial or industrial uses within the maximum standards set by the London Plan.'</p> <p>Part 1.c., 'For residential developments mobility scooter parking may be considered instead of additional blue badge spaces in areas of the borough with high levels of public transport accessibility and close to accessible stations' is supported in principle, but it should be clarified that London Plan requirements for parking provision for disabled residents in Policy T6.1 would generally be applied and that parking for mobility scooters would only be considered as an exception where justified. In such circumstances it must also be demonstrated that the route to/from accessible public transport is accessible and that there are a range of local services and facilities within easy reach of all people, including those who need step free routes</p> <p>In part 1.d. care should be taken with provision of car club bays in areas with high levels of connectivity where they may serve to encourage and facilitate car use for journeys that could be undertaken by walking, cycling or public transport.</p> <p>We support the requirement in part 3 for cycle parking in line with or higher than the minimum London Plan standards. This should consider both quality and quantity, including minimum levels of provision for non-standard cycle parking and demonstrating inclusive design.</p> <p>In part 4, charging of batteries for e-bikes may be best located away from cycle parking areas due to fire safety concerns. Batteries for e-bikes can generally be detached and charged at a conventional socket within the home.</p> <p>In part 5.c., it is not clear why major development with zero car parking on-</p> | <p>We welcome clarification that any car parking for commercial or industrial uses should be within the maximum standards set by the London Plan.</p> <p>We welcome clarification of the requirements for mobility scooter parking in part 1.c. and T3.1</p> <p>We welcome clarification of the requirements for charging E-bikes and mobility scooters in part 5. This should be checked for consistency with the latest safety advice from London Fire Brigade.</p> <p>We note that this approach has not changed but we understand that it is to cater for delivery and servicing vehicles.</p> <p>We reiterate our Regulation 18 response that in T3.1</p> |
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|                             | <p>site should contribute towards Electric Vehicle Charging Points elsewhere in the borough unless this is to cater for delivery and servicing vehicles. We would however encourage active EVCP for all disabled persons' parking and any parking justified for operational purposes (including all taxi ranks).</p> <p>For clarity and consistency, the requirements for Blue Badge parking in T3.1 should refer to London Plan Policies T6.1 (for residential) and T6.5 (for non-residential uses).</p> <p>Rather than setting out details of parking design in a Design and Access Statement and Landscaping Assessment it would be appropriate to require a Parking Design and Management Plan in line with Policy T6 of the London Plan.</p> <p>In T3.6 it would be helpful to include a reference to Transport Assessments which provide a basis to identify impacts on the transport network and to determine the need for appropriate mitigation.</p> <p>N/A</p> | <p>there should be a reference to the Blue Badge parking requirements in London Plan Policies T6.1 and T6.5.</p> <p>We welcome the amended reference to a Parking Design and Management Plan in T3.3.</p> <p>We note that this is already covered by T3.7 although it would be helpful to clarify that the Transport Assessment should include a day and night time Active Travel Zone Assessment at least for applications referred to the Mayor of London.</p> <p>We strongly welcome the addition of part 2 which states that 'Development that proposes a drive-through will not be supported. Development which results in the loss of existing car parking or excess road space would be supported.'</p>   |
| T4: Servicing a development | <p>Although it is made clear in T4.1, the core policy should include requirements for Construction Logistics Plans and Delivery and Servicing Plans, in line with London Plan Policy T7. Similarly, the core policy should include a presumption that servicing should take place off street wherever possible and that on street servicing should be an exception and only where it does not impact the safety, comfort and convenience of people walking and cycling, public transport users and public transport operations. We welcome support for cargo bikes. These should take precedence over zero emission vehicles which still cause congestion and increase road danger.</p> <p>Reference to the safety implications in T4.3 should encourage accreditation such as Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS).</p>   | <p>We reiterate our Regulation 18 response that the requirement for Construction Logistics Plans and Delivery and Servicing Plans should be made clearer using the standard terminology used in London Plan Policy T7 and providing a link to TfL guidance. The policy should also state a presumption that servicing should take place off street wherever possible to ensure consistency with London Plan Policy T7. This could be achieved by including the first sentence of T4.1 in the Implementation section as point 1 of Policy T4 'Where possible, servicing and deliveries should take place within the curtilage of the development.' These changes are necessary to ensure soundness and consistency with the London Plan.</p> <p>We welcome the recommendation of accreditation schemes in T4.3.</p> |

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| T5: Airport            | <p>We support the requirement that 'Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike' and that this should include reductions in car parking and improved public transport access. It would be helpful for the core policy refer to active travel improvements as mentioned in T5.5. These requirements should be confirmed in the Planning Obligations section.</p> <p>We note that the Council does not require another new Elizabeth line station to facilitate growth in the Royal Docks, although a privately funded station to improve access to the airport would be supported. Any privately funded station would need to be fully assessed using TfL modelling, and the financial, operational and construction issues would be significant such that we strongly recommend alternative measures to improve access to the airport by sustainable and active modes.</p>  | <p>We welcome the addition of a reference to active travel in point 4b and the additional bullet point in the Planning Obligations section which states that 'Contributions may be sought from airport developments for improved public transport and active travel access to the airport.'</p> |
| N1/N17: Gallions Reach | <p>We suggest that Beckton Riverside is included in the title for clarity.</p> <p>We strongly support point 4: 'radically reducing car parking and the dominance of road infrastructure across the Neighbourhood'.</p> <p>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.</p> <p>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</p> | <p>We note that no change has been made in response to this point.</p> <p>We note that no change has been made in response to this point.</p> <p>We welcome changes that have been made to N17 and N17.SA1 to reflect this point.</p>   |

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|   | <p>manage peak crowding.</p> <p>If development levels were high enough, we would likely want to provide additional capacity for Gallions Reach, potentially through uplifts linked to a Thamesmead extension. This would require a funding and delivery strategy.</p> <p>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 <b>at Beckton Riverside</b>. The DLR would continue <b>over the river</b> to another new <del>DRL</del> <b>DLR</b> station at Thamesmead <b>Central</b> in the London Borough of Greenwich.’</p> <p>We recommend that a potential bus, walking and cycling crossing of the Roding between Beckton and the River Road area in Barking &amp; 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.</p> <p>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.</p> | <p>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.</p> <p>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.</p> <p>We note that no change has been made in response to this point.</p> |
| N1.SA1/<br>N17. SA1: Beckton<br>Riverside | <p>See comments regarding DLR in N1 which would apply to this site.</p> <p>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.</p> <p>The second paragraph of the Development Principles section states that The development of this site should occur only once the outcome of the</p>   | <p>We welcome changes that have been made to N17 and N17.SA1 to reflect this point.</p> <p>We welcome clarification regarding the release of safeguarded land.</p> <p>We note and support the updated wording which provides flexibility and greater certainty on phasing of</p>   |

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|                       | <p>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.</p> <p>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.</p> <p>The infrastructure requirements should require a joint stakeholder approach between landowners, infrastructure providers and authorities.</p>  | <p>development.</p> <p>We welcome clarification of the status of the district centre.</p> <p>We welcome amended wording in the infrastructure requirements.</p>  |
| N2/N1: North Woolwich | <p>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.</p> <p>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.</p> <p>The agent of change principle also applies to the Woolwich Ferry and the</p> | <p>We note that no change has been made in response to this point.</p> <p>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.</p> |

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|  | new bus garage on Factory Road.   |   |
| N2.SA1/N1.SA1: North Woolwich Gateway        | See comment under N2 above regarding the need to retain bus stand space on Pier Road by the ferry terminal.   | <p>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.</p> <p>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.)</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b></p> |
| N2.SA2/N1.SA2: Rymill Street                 | We support the connectivity requirements, being a new east to west route across the north of the site and a north to south route across the centre of the site.   |   |
| N3/N2: Royal Victoria including Thames Wharf | <p>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.</p> <p>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.</p> <p>The Custom House and Prince Regent DLR Station bus stands sit within</p> | <p>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.</p> <p>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.</p>   |

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|                                    | 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.   |
| N3.SA1/N2.SA1: Silvertown Quays    | <p>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.</p> <p>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.</p> | <p>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 <del>upgrading</del> escalators to improve access.'</p> <p>We welcome the new wording in the design principles of N2.SA1 which has updated the green infrastructure requirements.</p>  |
| N3.SA2/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.   | <p>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.'</p> <p>The northern boundary of the site includes land and airspace occupied by DLR West Silvertown Station and viaducts.</p> <p>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.'</p> |
| N3.SA3/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  | We welcome inclusion of the following in the Infrastructure Requirements: 'Development should provide an upgrade of Pontoon Dock Station, including escalators to improve  |

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|                               | <p>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.</p>  | <p>access to the station.'</p> <p>The DLR viaduct passes diagonally across the north end of the site.</p> <p>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.'</p>  |
| N3.SA4/N2.SA4: Thameside West | <p>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.</p>   | <p>We note that no changes have been made in response to this point.</p> <p>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.</p> <p>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.'</p> |
| N4/N3: Royal Albert North     | <p>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 the Royal Docks DLR stations serving the area will be necessary, and a contribution secured from developers to mitigate impacts. Permeability for people walking and cycling will be expected to/from the dockside and throughout the area.</p> <p>Residential and other noise sensitive development must take account of</p> | <p>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.'</p> <p>'Development should deliver platform lengthening and</p>  |

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|  | the agent of change principle in relation to the DLR, highways and the airport.  | secondary means of escape at Royal Albert DLR Station.'  |
| N4.SA1/N3.SA1: Royal Albert North      | <p>Royal Albert DLR station would be the main station serving this site, although it has two-car platforms only. Our position remains (as per the extant planning permission for the Royal Albert Dock development) that platform lengthening and a secondary means of escape are necessary should there be significant development around the station or along the DLR corridor. A Grampian condition or obligation similar to that permission is required for any new planning consent. Improvements may also be required to the other DLR stations and to bus and active travel provision depending upon the nature and quantum of new development.</p> <p>Regardless of any safety concerns, development of sufficient size would result in a request for contributions towards DLR platform extensions to spread out passengers, minimise dwell times and manage peak crowding.</p> <p>If development levels were high enough, we would likely want to provide additional capacity for Royal Albert and Beckton Park, potentially linked to a Thamesmead extension. This would require a funding and delivery strategy.</p> | <p>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.'</p> <p>'Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.'</p> <p>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).</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b></p> |
| N5/N4: Canning Town (and Custom House) | <p>We welcome support for capacity improvements to Canning Town station. Development contributions are required to enhance the station's ability to manage crowds. The implications of planned increases to frequencies on the DLR must be taken into account, as well as demand for access to/from the station and areas to the west and north.</p> <p>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.</p> <p>Any reconfiguration of the bus station will need to ensure conformity with London Plan Policy T3 and London Plan Guidance on Sustainable Transport, Walking and Cycling. TfL, as owner and operator of the bus station, must take a leading role in developing any proposals. Ultimately, it will be TfL's decision whether to proceed with any changes put forward. The bus station is currently operating at capacity, therefore the existing</p>   | <p>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.</p> <p>We note that no change has been made in response to this point.</p> <p>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</p>   |



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|  | <p>capacity must be safeguarded and enhanced to cater for future demand.</p> <p>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.</p> <p>Provision of bus services in the area must ensure it serves new developments and existing communities, and improved permeability for people walking and cycling in needed throughout the area.</p> | <p>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.'</p> <p>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.</p>  |
| N5.SA1/N4.SA1:<br>Canning Town East        |  |   |
| N5.SA2/N4.SA2:<br>Silvertown Way East      |  |   |
| N5.SA3/N4.SA3:<br>Canning Town Holiday Inn |  |   |
| N5.SA4/N4.SA4:<br>Limmo                    | <p>Comments in N5 above regarding potential DLR extensions, reconfiguration of Canning Town bus station and the need to protect bus infrastructure apply to this site as well.</p> <p>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:<br/> <b>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.</b></p>   | <p>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.'</p> <p>We welcome the amended wording to address this point.</p> |
| N5.SA5/N4.SA5:<br>Canning Town Riverside   | <p>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</p>  | <p>We welcome amended wording in the design principles and infrastructure requirements for site N4.SA5 to address these points.</p> <p>We welcome inclusion of the requirement to safeguard land for a new bridge connection and the accompanying</p>   |

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|  | <p>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.</p> | <p>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.</p> <p>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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b></p> |
| N5.SA6/N5.SA1: Custom House Phase 1/ Freemasons Road | <p>Under 'Infrastructure requirements' the following should be added: <b>Development should provide bus standing and drivers' facilities.'</b></p> <p>The map should clarify if a new primary vehicle route is proposed to connect to Victoria Dock Road (a bus only circulation route is proposed in the emerging planning application for the site).</p> <p>Update – change Crossrail to Elizabeth line.</p>   | <p>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.'</p>   |
| N5.SA7: Custom House Phase 2                         |  |   |
| N5.SA8: Custom House Phase 3                         |  |   |
| N6: Manor Road                                       | <p>We support the principle of measures to address severance and provide new and improved connections, eg to West Ham station. These should be delivered through developer contributions or other funding sources because TfL is not currently able to commit funding.</p> <p>West Ham station may require interventions to address crowding and increase capacity because platforms are currently accessed by a single</p>  | <p>We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7).</p>   |

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|  | 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.   |  |
| 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).   |
| N7.SA1: Abbey Mills  | Any proposals for this site must deliver improvements to sustainable and active travel, including access to/from West Ham and Abbey Mills stations and improvements within either or both stations. Significant improvements for people walking and cycling will be needed to link this site with the surrounding area, including across the River Lea into Tower Hamlets. The suggested bridge link to West Ham station should not have a direct entrance into the station as this would require an additional ticket hall.  | <p>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.'</p> <p>'Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations.'</p> <p>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.</p> |
| N7.SA2: Parcel Force/Twelvetrees Park and former Bromley by Bow gasworks | Development is currently underway on this site under an extant consent. This includes access for bus services and the delivery of the new western entrance to West Ham station. Any additional/revised proposals for this site must ensure that these improvements are realised alongside the significant improvements for people walking and cycling that link the site with the surrounding area (including across the River Lea into Tower Hamlets). The agent of change principle and infrastructure protection measures should be applied to development close to existing rail lines and bus infrastructure, including West Ham bus garage. | <p>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.'</p> <p>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 <b>access for bus services, bus standing space as well as</b> access to, and capacity at, West Ham Station.'</p>  |

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|                            |  | 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 Twelvetreelocal Centre and the Manor Road neighbourhood.'   |
| N7.SA3: Sugar House Island | Development should improve walking and cycling conditions and the public realm on Stratford High Street through improved frontages.  | 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...'  |
| N8: Stratford and Maryland | <p>Major development in this area needs to be cognisant of its impact on Stratford station, which is already severely congested at peak times and on event days.</p> <p>We support the delivery of capacity enhancements at the rail station. Development proposals in the area should ensure that land is made available and funding is provided towards these enhancements.</p> <p>We support the principle of measures to address severance and improve connections.</p> <p>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.</p> <p>It will be crucial to protect the ability to widen the DLR alignment between Stratford and Bow Church to allow for future double tracking to enhance capacity and frequency on this corridor.</p> <p>Bus infrastructure in the neighbourhood that needs to be protected include the following: Stratford Regional bus station is within site N8.SA2 (and is TfL's busiest bus station). Stratford City and International bus stations are within N8.SA5.</p> <p>In the second paragraph of the vision the first sentence should be</p> | <p>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.</p> <p>We note that this has been corrected in the N8 Neighbourhood Profile.</p> <p>We welcome inclusion of the following in site N8.SA2 infrastructure requirements: 'Land should be safeguarded for double tracking the DLR route.'</p> <p>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.'</p> |

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|                           | <p>amended to read <b><u>'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.'</u></b></p> <p>Point 11 should be amended to read <b><u>'increasing the capacity of Stratford station and preventing development which would inhibit future station and interchange improvements'</u></b></p> <p>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.</p> <p>TfL's Interchange Best Practice Guidelines should be followed, particularly for the relationship with the bus station and services.</p> | <p>We welcome the addition of this wording.</p> <p>We welcome the addition of this wording.</p> <p>We note that no changes have been made in response to this point.</p>                                      |
| N8.SA1: Stratford Central |   |   |
| N8.SA2: Stratford Station | <p>In 'Development principles' (the last sentence of the first paragraph) the text should be amended to read <b><u>'Any redevelopment of Stratford bus station should retain the function of a consolidated bus station and meet TfL's future requirements.'</u></b></p> <p>In 'Design principles' (fifth paragraph), the text should be amended to read <b><u>'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.'</u></b></p>  | <p>We welcome the addition of this wording.</p> <p>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.</p> |

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|  | <p>In the penultimate paragraph of 'Design principles,' the text should be amended to read '<b><u>The design and layout of the site should mitigate the impact of noise from the railway transport operational uses.</u></b>'</p> <p>In 'Infrastructure requirements', the following amendment should be made: <b><u>Increased station and interchange capacity through improved circulation, ticket hall and station entrances.</u></b></p> <p>In 'Phasing and implementation' the following amendment should be made: '<b><u>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.</u></b>'</p> | <p>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.'</p> <p>We welcome the change in wording.</p> <p>We welcome the change in wording.</p> <p>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.</p> <p>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.</p> <p>The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets.</p> |
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|  |   | To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b>   |
| N8.SA3: Greater Carpenters District      | <p>It should be clarified that the proposal for Jupp Road Bridge is for a walk bridge rather than a 'primary vehicular route'.</p> <p>In 'Infrastructure requirements' the following should be added: <b>'Safeguard and for double tracking DLR route.'</b></p>   | <p>We note that key routes and connections are now shown differently on the site allocation maps.</p> <p>We welcome the addition to the infrastructure requirements.</p>   |
| N8.SA4: Stratford High Street Bingo Hall |   |  |
| N8.SA5: Stratford Town Centre West       | <p>The list of existing uses should be amended to read <b>'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.'</b></p> <p>In 'Infrastructure requirements' the following should be added: <b>'Retention of bus stations and interchange functions.'</b></p> | <p>We welcome the amended description of existing uses.</p> <p>We welcome the addition of this wording.</p> <p>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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement:<br/><b>'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.'</b></p> |
| N8.SA6: Stratford Waterfront South       |   |  |
| N8.SA7: Rick Roberts Way                 |   |  |

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| N8.SA8: Bridgewater Road    |  |   |
| N8.SA9: Pudding Mill Lane   | <p>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').</p> <p>The final paragraph of 'Infrastructure requirements' includes 'a new pedestrian/cycle connection from Wrexham Road over the A12 and River Lea' and the dotted line alignment shown runs through the Elizabeth line substation. This is not something TfL would support given the access required across Elizabeth line infrastructure.</p> | <p>We note that key routes and connections are now shown differently on the site allocations maps.</p> <p>The northern boundary of this site includes land occupied by DLR tracks and an Elizabeth line substation.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b></p> |
| N8.SA10: Chobham Farm North |  | <p>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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'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.'</b></p>   |
| N9: West Ham                | See comments on N9.S1: Plaistow North which apply to this wider area.  | 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.  |
| N9.SA1: Plaistow North      | We welcome the provision of step-free access to Plaistow station as a requirement of this site allocation. 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 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  |



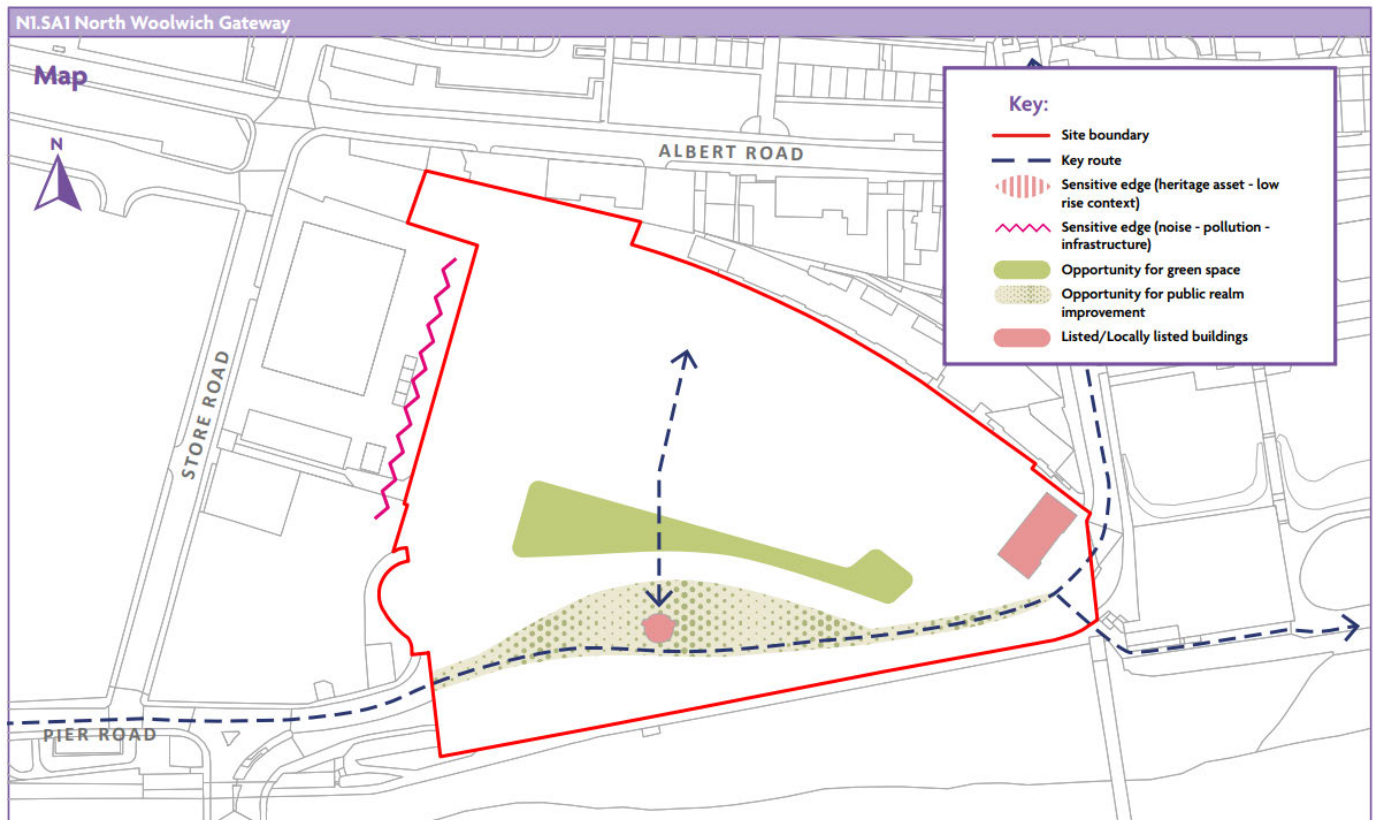
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|  |   | <p>deliver step free access.</p> <p>London Underground have a maintenance access across this site.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: 'The potential constraint of the LU access route on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</p> |
| N10: Plaistow                                | 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.   |
| N10.SA1: Balaam Leisure Centre               |   |  |
| N10.SA2: Newham 6 <sup>th</sup> 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.   |
| N10.SA3: Newham Leisure Centre               |   |  |
| N10.SA4: Balaam Street Surgery Complex       |   |  |
| N11: Beckton                                 | <p>We welcome parts 4, 5 and 6 which support redevelopment of East Beckton town centre and the intensification of existing retail and leisure parks where this maximises the benefits of existing and planned transport connectivity and capacity provided by proximity to DLR and bus stations. East Beckton bus station to the south-east of N11.SA1 will need to be protected.</p> <p>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</p> | <p>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. We note that no change has been made in response to this point.</p>   |

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|                                   | revived.   |   |
| 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 on this site. |
| N11.SA2: Cyprus                   | Capacity issues at Cyprus DLR station need to be considered alongside any other improvements necessary to mitigate impacts. Walk and cycle links should be improved, including linkages across rail and road corridors.  | 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.'   |
| N11.SA3: Royal Docks Road         |  |   |
| N12: East Ham South               | <p>White Horse bus stands on Rancliffe Road junction with High Street South and Newham Town Hall bus stands on Wellington Road will need to be protected.</p> <p>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.</p> | <p>Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.</p> <p>We note that no change has been made in response to this point.</p>  |
| N13: East Ham                     | <p>Ron Leighton Way bus stands on both sides of the highway on west side of N13.SA2 will need to be protected.</p> <p>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.</p>   | <p>Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.</p> <p>We note that no change has been made in response to this point.</p>  |
| N13.SA1: East Ham Western Gateway |  |   |
| 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.  |
| N13.SA3: Former East Ham Gasworks |  |   |

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| 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.  |
| N14.SA1: Queen's Market                 |   |  |
| N14.SA2: Shrewsbury Road health complex |   |  |
| N15: Forest Gate                        | <p>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.</p> <p>Wanstead Park station, Woodford Road bus stands on the east of N15.SA1 will need to be protected.</p> | <p>We note that there is no mention of development funding for step free access.</p> <p>Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.</p> |
| 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.   |
| N15.SA2: Woodgrange Road West           |   |  |
| 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.  |

## Appendix B – Plans of TfL Infrastructure (forms part of TfL Reg. 19 response to Newham Local Plan)

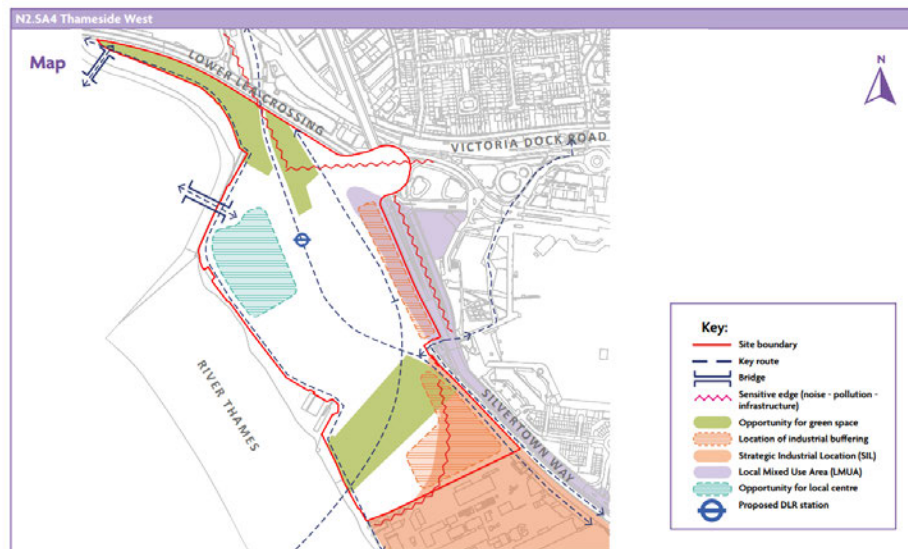
### SITE N1.SA1 (North Woolwich Gateway)



Plan 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.)



## SITE N2 SA4 (Thameside West)



Plans 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.

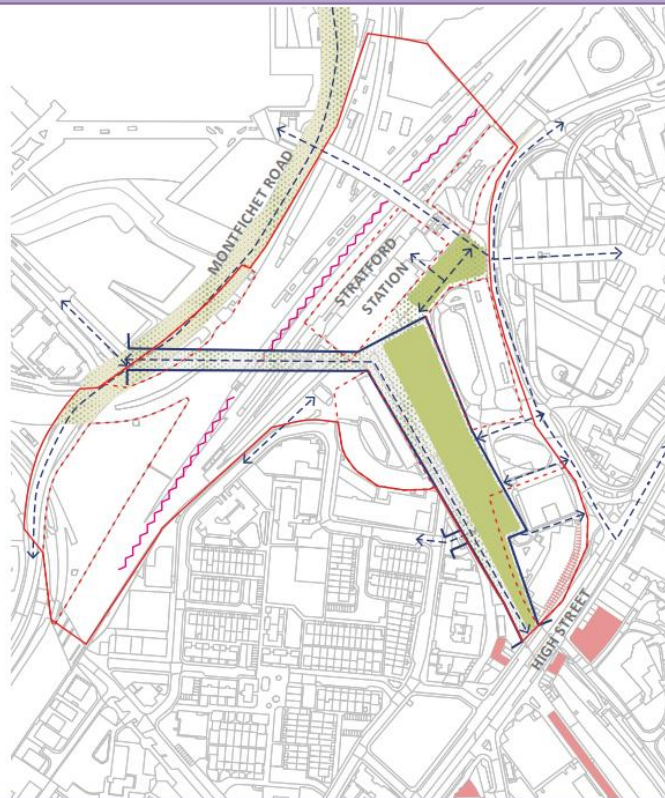
**N3 SA1 (Royal Albert North)** – at west end of site DLR tracks are within the site and Elizabeth line tunnels pass under the site (red hatched).



## N8 SA2 (Stratford Station)

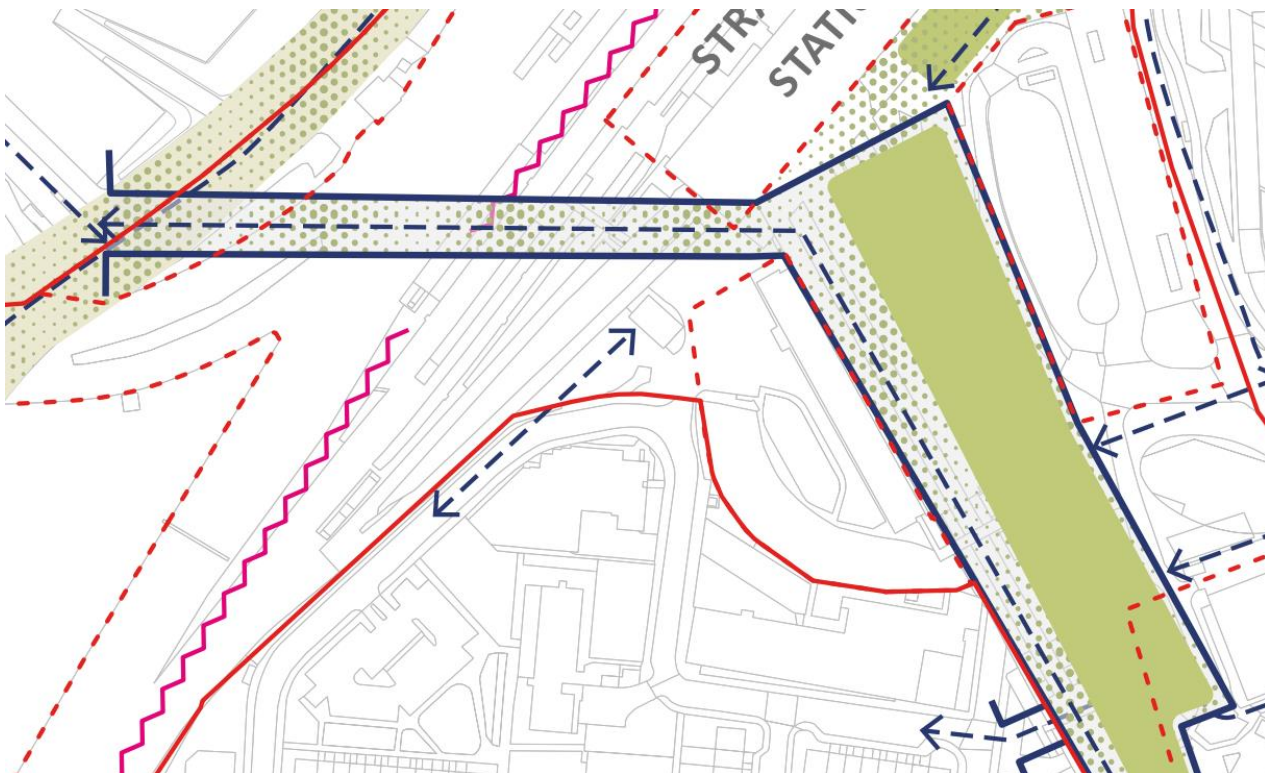
N8.SA2 Stratford Station

### Map



#### Key:

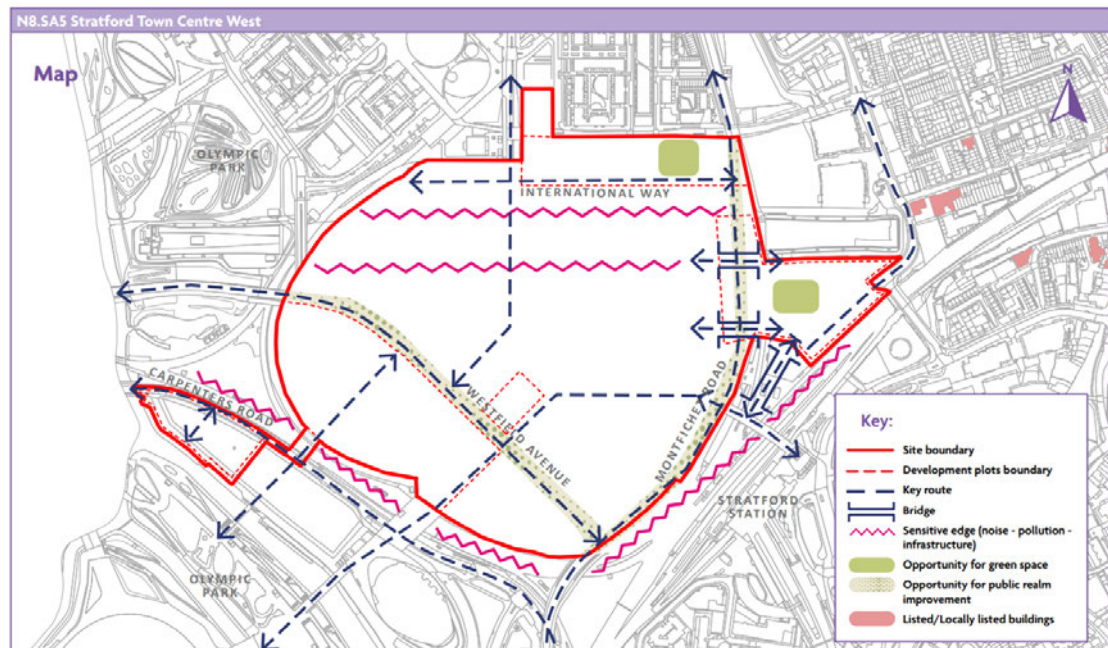
- Site boundary
- Key route
- Raised street and bridge
- Sensitive edge (noise - pollution - infrastructure)
- Sensitive edge (heritage assets - low rise context)
- Opportunity for green space
- Opportunity for public realm improvement
- Listed/Locally listed buildings



The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets of the various railway infrastructure managers.

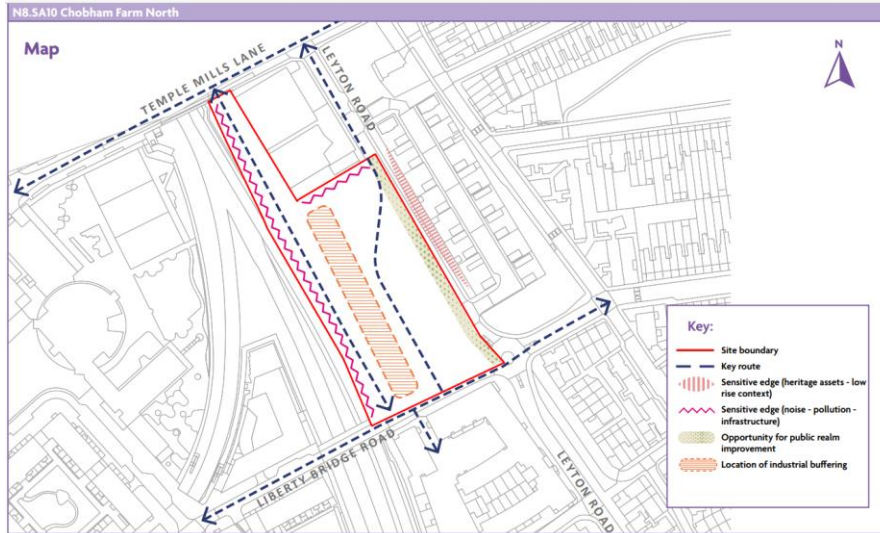


## N8 SA5 (Stratford Town Centre West)



Plans 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.

## SITE N8 SA10 (Chobham Farm North)



Plan showing approximate location of Central line tunnels in immediate vicinity of and potentially partially under site as red dotted line.