

Appendix 10: Building a Fairer Newham Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-001	Abrdn	Reg18-K-001/003	Building a Fairer Newham	BFN1 Spatial Strategy			2			Abrdn support the principle of making best use of land in accordance with national policy. [A:1]	Support noted.
Reg18-K-001	Abrdn	Reg18-K-001/004	Building a Fairer Newham	BFN1 Spatial Strategy			3			Abrdn support the principle of creating new employment and industrial development.	Support noted.

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Reg18-K-001	Abrdn	Reg18-K-001/005	Building a Fairer Newham	BFN1 Spatial Strategy			4			Abrdn support the principle of new retail and leisure development.	Support noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/042	Building a Fairer Newham	BFN1 Spatial Strategy			1b			<p><i>1b. supporting incremental change in the N9 West Ham, N10 Plaistow, N14 Green Street, N13 East Ham, N12 East Ham South, N16 Manor Park and Little Ilford, N11 Beckton and N15 Forest Gate neighbourhoods through the enhancement of each neighbourhood's character and the transformation of site allocations to deliver new homes.</i></p> <p>Support The ability of site allocations throughout the borough to support new growth.</p>	Support noted.

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Reg18-E-070	Aston Mansfield	Reg18-E-070/043	Building a Fairer Newham	BFN1 Spatial Strategy			2			<p>2. <i>Development will make the best use of land and optimise sites by:</i></p> <p><i>a. applying a design-led approach and supporting tall buildings in the borough's Tall Building Zones;</i></p> <p><i>b. conserving the borough's heritage assets and their settings.</i></p> <p>Support, desire to make best use of land.</p> <p>Suggested Change to wording: Policy as currently worded implies only making best use of land within Tall Building Zones.</p> <p>2. <i>Development will make the best use of land and optimise sites by:</i></p> <p><i>a. applying a design-led approach to high density development across the borough that responds to the sites surrounding character and context.</i></p> <p><i>b. Supporting tall buildings in the borough's Tall Building Zones;</i></p> <p><i>c. conserving the borough's heritage assets and their settings.</i></p> <p><i>scale and massing, with scope for density and height increases where there is no negative impact upon local character .</i></p>	A change to this policy has been made to clarify that a design-led approach applies to all sites. Please see the new wording in BFN1 part 2.

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Reg18-E-070	Aston Mansfield	Reg18-E-070/044	Building a Fairer Newham	BFN1 Spatial Strategy			5			<p>5. Development will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities by:</p> <p>a. directing new community facilities to the borough's network of Town Centres and accessible, neighbourly locations to deliver 15-minute neighbourhoods;</p> <p>d requiring the delivery of new open space on the majority of site allocations</p> <p>Support: Creation of new neighbourhood parks and community facilities.</p>	Support noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/045	Building a Fairer Newham	BFN1 Spatial Strategy			6			<p>6. Improving strategic and local connections and increasing active travel through the implementation of Low Traffic Neighbourhoods, new bridges over the River Lea and the docks, extension of the Leaway Walk, Thames Path and Capital Ring and by reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling.</p> <p>Support: Desire to create LTNs.</p> <p>Suggested change to wording: Policy needs to be clear that applies to both existing and future development.</p> <p>6. Improving strategic and local connections and increasing active travel through the implementation of Low Traffic Neighbourhoods across the borough and within site allocations, new bridges over the River Lea and the docks, extension</p>	A change to this policy has been made to better reference the need for improved local walking and cycling connections. This will include corridor schemes, including the Royal Docks Corridor Scheme. Please see the new wording in BFN1 part 6.

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										<i>of the Leaway Walk, Thames Path and Capital Ring and by reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling.</i>	
Reg18-E-122	Ballymore	Reg18-E-122/005	Building a Fairer Newham	BFN1 Spatial Strategy						[Appendix 1] Ballymore support directing growth to the Opportunity Areas within the borough and a design-led approach to optimising capacity to help deliver the target 47,600 homes over the plan period. To achieve these targets, the design-led approach should be carried through all design and housing policies to ensure there is sufficient flexibility for innovative design solutions and to optimise capacity in the most accessible locations.	Comment noted. The design-led approach has informed the Local Plan and it is considered there is sufficient flexibility to deliver sustainable growth.

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Reg18-E-077	Ballymore Group	Reg18-E-077/002	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			Firstly, we support the recognition that the Royal Docks and Beckton Riverside Opportunity Area is able to support significant levels of growth, with the potential to deliver a significant number of new homes and jobs [...]	Support noted.
Reg18-E-077	Ballymore Group	Reg18-E-077/003	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			[...] however, we suggest that the capacity of the Opportunity Area is updated to reflect the latest consultation version of the Royal Docks OAPF published by the Mayor of London on 7th February 2022 (i.e. 31,500 new homes and 40,000 new jobs), to ensure consistency across all policy levels.	This wording change has been made. Please see the new wording in BFN1.

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Reg18-E-077	Ballymore Group	Reg18-E-077/004	Building a Fairer Newham	BFN1 Spatial Strategy			4.c			We also support the designation of N3.SA3 Connaught Riverside as a new local centre which can support retail and leisure floorspace to accommodate the needs of residents, workers and visitors.	Support noted. Please note that the provision of a new Local Centre within N3.SA3 Connaught Riverside is supported. The whole site is not designated as a Local Centre.
Reg18-E-143	Canal and River Trust	Reg18-E-143/006	Building a Fairer Newham	BFN1 Spatial Strategy			6 and key diagram			With regards to Policy "BFN1:Spatial Strategy", point 6 "Improving strategic and local connections and increasing active travel through..." could also include reference to the towpath along the River Lee Navigation. We do note that the Key Diagram on page 21 suggests the route may be highlighted for "Transport and connectivity improvements", although at this scale it isn't clear if this includes the towpath.	The towpath along the River Lee Navigation is included in the policy, under the name 'Leaway Walk' and this is what is illustrated on the key diagram.

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Reg18-E-148	City of London	Reg18-E-148/007	Building a Fairer Newham	BFN1 Spatial Strategy			1b			Draft Policy BFN1 (Spatial Strategy) identifies the location, scale and uses of development across the borough. This policy is generally supported. This includes the need for incremental changes in the Forest Gate neighbourhood through the enhancement of this neighbourhood's character and the requirement for development to make the best use of land and optimise sites, whilst conserving the borough's heritage assets and their settings.	Support noted.
Reg18-E-148	City of London	Reg18-E-148/009	Building a Fairer Newham	BFN1 Spatial Strategy			5			We also support the strategic requirement of part 5 of Draft Policy BFN1 which seeks to protect and enhance existing parks and community facilities, including directing new community facilities to accessible, neighbourly locations to deliver 15-minute neighbourhoods.	Support noted.

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Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/047	Building a Fairer Newham	BFN1 Spatial Strategy						<p>Issues around 15- minute neighbourhoods</p> <p>As presented in the draft plan iteration, 15 minute neighbourhoods appear to be a vehicle for gentrification in Newham alongside the draft plan comments about the urban village.</p>	<p>Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, businesses and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also requires that all significant developments are masterplanned alongside the existing community - so that the community are central to shaping the borough as it changes.</p>

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											resulted in some changes to the neighbourhoods, particularly in relation to the boundary between West Ham and Forest Gate and the boundary between Canning Town, Custom House and Beckton. This has resulted in Canning Town and Custom House being split into two neighbourhoods, each with their own vision and policy.
Reg18-E-151	<p>ClIr Islam, ClIr Beckles, ClIr Choudhury, ClIr Corben, ClIr Master, ClIr Sarley Pontin</p>	Reg18-E-151/049	Building a Fairer Newham	BFN1 Spatial Strategy						<p>The concept of such neighbourhoods is fine in terms of principle; however, this seems to have been imposed. Each locality within the borough is vastly different from another, as are the types of residents that live in them, including income levels, employment types, age, disability and cultural profiles. It is important that there is further detailed work and analysis around the reality of lives lived by local residents and what the actual circumstances are on the ground.</p>	<p>Comment noted. The introduction of 16 (now 17) neighbourhoods was in response to feedback from residents that the adopted Local Plan's spatial strategy, with 5 spatial areas didn't reflect their lives experience or understanding of the neighbourhoods.</p> <p>The boundaries of the neighbourhoods were then identified through an analysis of the different ways the borough can be subdivided. This included factors like administrative boundaries such as ward boundaries and planning designations such as town centre boundaries or conservation areas. The analysis also considered their character including the look and feel of an area and their function such as the type of uses in an area as well as demographic information. The boundaries were further shaped by public engagement and feedback from residents,</p>

<p>Comment Response</p>	<p>businesses and local organisations on what they perceive to be their neighbourhood, what is important to them and what they like and don't like. There was also workshops with officers from across the council and a Councillor workshop. The findings of this consultation can be found in the Newham Characterisation Study.</p> <p>The neighbourhood boundaries were also open to consultation at the Regulation 18 stage, particularly as part of the Local Plan Assemblies. The feedback received has resulted in some changes to the neighbourhoods, particularly in relation to the boundary between West Ham and Forest Gate and the boundary between Canning Town, Custom House and Beckton. This has resulted in Canning Town and Custom House being split into two neighbourhoods, each with their own vision and policy.</p>
<p>Comment</p>	
<p>Implementation</p>	
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<p>Clause</p>	
<p>Introduction</p>	
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Reg18-E-151	ClIr Islam, ClIr Beckles, ClIr Choudhury, ClIr Corben, ClIr Master, ClIr Sarley Pontin	Reg18-E-151/050	Building a Fairer Newham	BFN1 Spatial Strategy						Assets described in the Plan in relation to neighbourhoods, such as community spaces or shops selling good quality fresh fruit and vegetables, will not just appear especially if there are limitations in terms of land availability or costs. This reality, including barriers, is not acknowledged in the plan	Comment noted. The Local Plan cannot, on its own deliver 15 minute neighbourhoods. However, the Local Plan and planning policy can be a barrier to the delivery of 15 minute neighbourhoods. This plan has sought to reduce restrictions on locations of certain uses, including smaller community facilities, so they can be better distributed through the borough. The Local Plan can also, through site allocations, require the delivery of certain community facilities and retail units which will help deliver 15 minute neighbourhoods. The 'What is a Local Plan' section at the start of the document also outlines the limitations of what a Local Plan can deliver.
Reg18-E-145	Environment Agency	Reg18-E-145/059	Building a Fairer Newham	BFN1 Spatial Strategy			7			It is positive to see that the need to protect and mitigate the negative impacts of development on strategic and utilities infrastructure is recognised in Policy BFN1.7. We recommend this policy is strengthened to encourage the improvement of essential infrastructure, and not just protection.	A change to this policy has been made to reference the need for improvements to the infrastructure network. Please see the new wording in BFN1 part 7.

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Reg18-E-145	Environment Agency	Reg18-E-145/060	Building a Fairer Newham	BFN1 Spatial Strategy					BFN 1.1	Implementation section BFN1.1. refers to development being required to comply with 'site specific development and design principles'. We recommend that it is clarified that this is anchored to the Local Plan's design policies, and the London Plan's design guidance (in reference implementation section D1.1.).	A change to this implementation text has been made to clarify that the design and development principles are outlined in the Plan's site allocations. Please see new wording in the implementation text for BFN1.1.
Reg18-E-145	Environment Agency	Reg18-E-145/062	Building a Fairer Newham	BFN1 Spatial Strategy			6			We are pleased to see the commitment to increasing active travel with improved walking and cycling infrastructure.	Support noted.

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Reg18-E-145	Environment Agency	Reg18-E-145/065	Building a Fairer Newham	BFN1 Spatial Strategy					BFN 1.5	In reference to implementation section BFN1.5, we agree that the delivery of sufficient infrastructure is essential to support the projected growth throughout the borough during the draft Local Plan's period. We recommend this is strengthened to promote that this should be considered from the outset.	This change has not been made. Further consideration of the need to consider infrastructure sufficiency and delivery is included in policy BFN4.
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/003	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			Support for the spatial strategy and industrial intensification LB Newham's vision for Building a Fairer Newham promotes an inclusive economy and an increase of inward investment to contribute to the creation of sustainable jobs. The Draft Local Plan looks to help achieve this vision by recognising the need for maximising the economic potential of land and delivering new employment space that supports key growth in sectors experiencing increasing demanding, including the warehousing, distribution and light manufacturing industries. To distribute the benefits of growth and create a network of successful and well-connected 15-minute neighbourhoods, Policy BFN1: Spatial Strategy directs development to all of Newham's neighbourhoods. Specifically, Policy BFN1 directs	Support noted.

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										significant levels of growth to the N8 Stratford and Maryland neighbourhood, supported by a redesigned Stratford station. Considering the recent transport improvements to the already well-connected Stratford and Maryland neighbourhood, we support the principle that the area can facilitate significant levels of growth.	
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/004	Building a Fairer Newham	BFN1 Spatial Strategy			3		BFN 1.3	Policy BFN1 states that protecting and intensifying the borough's Local Industrial Locations for a diverse range of industrial and storage, logistics and distribution and related uses will aid the creation of new jobs and help deliver a modern, greener and inclusive economy. Supporting paragraph BFN1.3 further empathises this, stating that, in order to deliver Newham's regional economic role as a key location for industrial land, the Draft Local Plan will look to consolidate and optimise Newham's remaining industrial sites to deliver modern, intensified, high quality workspaces and ensure they are suitably buffered from residential areas by lighter industrial and workshop uses. We strongly support this outlook, in particular supporting the intensification of Local Industrial Locations.	Support noted.

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Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/016	Building a Fairer Newham	BFN1 Spatial Strategy			3			<p>Conclusion</p> <p>Overall, we are supportive of the Draft Local Plan's policies that recognise the potential for intensification and redevelopment of the International Business Park Site. Considering the magnitude of the Newham's office and industrial needs, we are particularly supportive of Policy BFN1 explicitly stating that development will create new jobs and deliver a modern, greener and inclusive economy by protecting and intensifying Newham's Local Industrial Locations.</p>	Support noted.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/008	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			<p>We welcome the focus on the Beckton Riverside Opportunity Area for "significant levels of growth" in draft Policy BFN1 (Spatial strategy) and the specific reference to the indicative new jobs capacity figure of 41,500 from London Plan Policy SD1 (Opportunity Areas), to which data centre development of the Site will contribute to.</p>	Support noted.

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Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/010	Building a Fairer Newham	BFN1 Spatial Strategy						In order to reflect the evidenced need for data centre development and to ensure consistency with draft Policy J1, draft Policy BFN1 should be amended to include specific reference to data centre uses.	A change to this policy wording has not been made. No specific uses are referenced in this policy.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/013	Building a Fairer Newham	BFN1 Spatial Strategy			3.a			Recommendation 1: Ensure that BFN1(3a) includes specific reference to data centre uses and that J1(2a) confirms that data centres are B8 uses.	A change to this policy wording has not been made. No specific uses are referenced in this policy.

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Reg18-E-093	Greater London Authority	Reg18-E-093/005	Building a Fairer Newham	BFN1 Spatial Strategy						The Spatial Strategy in the draft plan directs new development to 16 neighbourhoods underpinned by the 15-minute neighbourhood approach with significant levels of growth directed toward Royal Docks and Beckton Riverside Opportunity Area; Manor Road and Three Mills neighbourhood; and Stratford and Maryland neighbourhood.	Comment noted.
Reg18-E-093	Greater London Authority	Reg18-E-093/006	Building a Fairer Newham	BFN1 Spatial Strategy						The Mayor welcomes that the draft plan sets out detailed policies for homes, transport, economy, high streets, green infrastructure, climate emergency, community facilities, waste, and design supported by established and emerging local evidence and strategies.	Support noted.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/055	Building a Fairer Newham	BFN1 Spatial Strategy						Hadley supports the spatial strategy of directing growth to the borough's neighbourhoods and making the best use of land through optimising development.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/056	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			It also supports the inclusion of the Stratford and Maryland neighbourhood as an area where significant levels of growth will be directed. This approach reflects Stratford's position as a Metropolitan Centre, with the potential to be an International Centre	Support noted.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/057	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			However, it suggests that Part 1.a of the policy should make clearer that it is referring to “directing significant levels of growth in housing and jobs ”.	This change has not been made. We did not consider this change to be appropriate as while growth will predominantly be in homes and jobs, infrastructure and town centre uses are also required in these locations.
Reg18-E-147	Historic England	Reg18-E-147/002	Building a Fairer Newham	BFN1 Spatial Strategy			2b			We consider there is much to welcome in terms of the contents of the draft Plan. In particular, we note the commitment set out within Objective 3 to the protection of the borough’s heritage and the successful integration of new development. Together with other key references, including the conservation of the borough’s heritage assets within policy BFN1.2b [and the focus on applying the characterisation study in formulating development proposals within policy D1], we believe there is an appropriate strategic emphasis on the historic environment.	Support noted.

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Reg18-E-105	IQL South	Reg18-E-105/006	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			Overall, IQL South supports the approach of the spatial strategy to direct growth to well-connected areas, including Stratford where higher density developments can be accommodated to meet the borough's needs.	Support noted.
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/004	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			We support Draft Policy BFN1 (Spatial strategy) that directs significant levels of growth to the Royal Docks and Beckton Riverside Opportunity, which have the potential to deliver 30,000 new homes, along with its support for tall buildings while conserving the borough's heritage assets and their settings.	Support noted.

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Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/005	Building a Fairer Newham	BFN1 Spatial Strategy			1			We also agree with the concept of 15-minute neighbourhoods in Draft Policy BFN1.	Support noted.
Reg18-E-097	Lee Valley Regional Park Aut+M1351 3+135:161	Reg18-E-097/007	Building a Fairer Newham	BFN1 Spatial Strategy						A clear policy statement supporting the Regional Park, its leisure and sporting opportunities, open space and biodiversity as both a local asset and a regional resource forming part of London's green infrastructure would provide developers with certainty when considering the location, design and scale of development. Such a policy would also need to consider how to resolve the potential tension between the 15 minute neighbourhood concept and the Regional Park's remit to provide leisure facilities, venues and open spaces that attract and meet the needs of visitors from across the wider region (London, Hertfordshire and Essex).	This policy approach has now changed to make clear, in this policy, LBN support for the Lee Valley Regional Park and the associated framework. This is in line with the policy support for the Park already included in the Green and Water Space chapter. Please see the new wording in BFN1.5 and associated justification and implementation text.

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Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/003	Building a Fairer Newham	BFN1 Spatial Strategy						[The Authority] [...] and supports the Council's spatial strategy and approach to growth.	Support noted.
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/005	Building a Fairer Newham	BFN1 Spatial Strategy			Key Diagram			It is noted that the draft Policy BFN1 'Spatial Strategy' directs significant levels of growth and the creation of new open spaces and community facilities to site allocations within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. These neighbourhoods include significant areas of the Regional Park within their boundaries and this strategy has the potential to both impact upon the Park as a result of increased development pressure and associated environmental impacts and offer opportunities that would benefit the Park, such as investment in open spaces, improved access routes between areas and better public transport provision. The Regional Park boundary should therefore be identified as a statutory designation on the Key Diagram.	This change has not been made. The Regional Park boundary is identified as a statutory designation on the Policies Map. The key diagram is meant to illustrate the spatial strategy and indicate where growth and change will occur.

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Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/008	Building a Fairer Newham	BFN1 Spatial Strategy						<p>The text below is carried over from the Authority's previous comments at the Issues and Options stage as an example of the supporting text needed to cover the above requirement. It can be adapted to suit the style of the Local Plan document and officers from the Authority would be happy to discuss this further.</p> <p>"The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. Riparian authorities such as Newham are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the</p>	<p>This policy approach has now changed to make clear, in this policy, LBN support for the Lee Valley Regional Park and the associated framework. This is in line with the policy support for the Park already included in the Green and Water Space chapter. Please see the new wording in BFN1.5 and associated justification and implementation text.</p>

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										LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park."	
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/003	Building a Fairer Newham	BFN1 Spatial Strategy			5			<p>Policy BFN1: Spatial Strategy</p> <p>We welcome the commitment in point 5 of policy BNF1 that new development 'will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities[...]'</p>	Support noted.

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Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/004	Building a Fairer Newham	BFN1 Spatial Strategy			5		BFN 1.8	<p>However, whilst the remainder of point 5, the ‘justification’ and the ‘implementation’ sections set out the requirement for site allocations to deliver new open space, there is no discussion of how the protection of existing open spaces should be implemented.</p> <p>We recommend point 5 of policy BFN1 is expanded to note that development ‘will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities. Developments impacting on existing parks must demonstrate that they will deliver a neutral or positive effect for the parks.’</p> <p>This could be expanded in the ‘implementation’ section with a specific sub-policy (BFN1.8) noting that:</p> <p>‘Future development should protect and enhance existing parks and open spaces, by considering potential impacts including views in and out of open spaces, the availability of natural light and the maintenance of open spaces in the case of intensification of use.’</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the spatial strategy outlines how and where we anticipate change and growth to occur. The protection of existing open spaces is covered in more detail by policy GWS1.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/005	Building a Fairer Newham	BFN1 Spatial Strategy					Policy Links	It is surprising that the 'Policy Links' section in the Spatial Strategy does not include a reference to Policy G4: Open Space, from the London Plan 2021. Please add this policy to the reference list.	The addition of this reference has not been made. A significant number of London Plan policies could have been referenced as links to this policy - as it addresses almost all land uses. Instead the most relevant spatial policies have been referenced.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/058	Building a Fairer Newham	BFN1 Spatial Strategy			6			Policy BFN1 – Bullet point 6 – [highlights improvements to strategic and local connections to promote walking and cycling which are supported] – but does not highlight QEOP as major metropolitan park in the borough. Bullet point 6 should be worded to include Queen Elizabeth Olympic Park as a major metropolitan park in the Borough and a key destination for a range of users.	A change to this policy approach has not been made. We did not consider this change to be appropriate as part 6 of the policy highlights key walking and cycling routes and not destinations. We agree that Queen Elizabeth Olympic Park is a major metropolitan park in the Borough and a key destination for a range of users, but it is not a route.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/004	Building a Fairer Newham	BFN1 Spatial Strategy						[Natural England advises that the Plan's vision and] emerging development strategy [should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area.]	Comment noted.
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/005	Building a Fairer Newham	BFN1 Spatial Strategy			3.a			Policy BFN1: Spatial Strategy Draft Policy BFN1 (Spatial Strategy) identifies the location, scale and uses of development across the borough. This is generally supported, particularly the protection and intensification of the borough's Strategic Industrial Location (SIL) for a diverse range of industrial, storage, logistics, distribution and related uses. Bow Goods Yard is designated as a SIL within the draft Local Plan. This designation is discussed further below in the context of specific policies.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-094	Poplar HARCA	Reg18-E-094/011	Building a Fairer Newham	BFN1 Spatial Strategy						In addition, Policy BFN1: Spatial Strategy notes the need to improve strategic and local connections with the implementation of new bridges over the River Lea and the Docks and the extension of the Leaway Walk to enable better walking and cycling. All of these proposed new bridges, and the enhancement of the Leaway route and its connections is fully supported by Poplar HARCA. Together they will help stimulate the appropriate transformation of this location, as set out in the Plan's Vision, and support it as a vibrant successful place.	Support noted.
Reg18-E-094	Poplar HARCA	Reg18-E-094/014	Building a Fairer Newham	BFN1 Spatial Strategy						However, is noted that the existing Rubins Bridge over the DLR line is not referred to although it could immediately improve connectivity if opened to pedestrians.	A change to this policy has not been made. We did not consider this change to be appropriate as the specific names of the bridges have not been included. However, opening the Rubins Bridge is considered an aspiration of delivering the final elements of the Leaway.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-094	Poplar HARCA	Reg18-E-094/015	Building a Fairer Newham	BFN1 Spatial Strategy						Furthermore, a link bridge extension from the red bridge at City Island would better connect to Canning Town Station. It is argued that these connections are also included in the final Local Plan.	A change to this policy has been made. We did not consider this specific change to be appropriate as the specific names of the bridges have not been included. However, we have included reference to the need for bridges over different types of barriers - not just waterways. Please see the new wording in BFN1 part 6.
Reg18-E-033	Port of London Authority	Reg18-E-033/007	Building a Fairer Newham	BFN1 Spatial Strategy			6			The Local Plan vision, site allocations and draft policy BFN1 (Spatial Strategy) currently proposes that along the River Lea, new bridges and walkways will create better linkages to natural spaces, stations and neighbouring Tower Hamlets. It must be made clear that any proposed crossing situated over navigable waterways ensures that the public right of navigation is maintained, that safe navigation can continue and that the PLA are involved in the development of such proposals where these cross over areas of the PLA's jurisdiction and / or landownership at an early stage, so that amongst other matters, the height of any proposed bridge can be understood. The need for this early engagement must be highlighted within the Local Plan, potentially in part 6 of policy BFN1 and the associated Infrastructure Delivery Plan (IDP).	A change to this policy approach has not been made. We did not consider this change to be appropriate as the detail related to consultees on transport infrastructure projects is included in policy T1. The implementation text for T1.1 has been amended to include references to bridges and the role of the PLA.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/014	Building a Fairer Newham	BFN1 Spatial Strategy			3e			<p>Recommendations</p> <p>For consistency with the national planning policy and in the interest of ensuring effective and positively prepared policies in accordance with NPPF 35, we would recommend the following amendments to draft policy and allocation wording:</p> <ul style="list-style-type: none"> · Policy BFN1 (Part 3. e.) – “requiring new industrial and/or employment floorspace consistent with Policy J1 and the development principles of site-specific allocations on...” 	A change to this policy wording has not been made. The Plan has to read as, and will be applied as, a whole. The locations listed in BFN1 part 3e are consistent with policy J1 and the site allocations.
Reg18-K-047	Resident	Reg18-K-047/003	Building a Fairer Newham	BFN1 Spatial Strategy			2			<p>Renewable energy should also be included as a land use option in industrial, utilities and commercial areas - wind turbines & solar - alongside factories, warehouses, commercial retail parks, large open car park and the Beckton Sewage Works etc</p>	<p>A wording change to show support for renewable energy generation has been made. Please see the new wording in Policy CE2 Zero Carbon Development.</p> <p>The Council considers that the solar photovoltaic panels are the most likely renewable energy source in the borough, however it would consider other renewable energy generation proposals on a case by case basis.</p>

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Reg18-K-047	Resident	Reg18-K-047/005	Building a Fairer Newham	BFN1 Spatial Strategy			6			" reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling." Is essential	Support noted
Reg18-K-047	Resident	Reg18-K-047/006	Building a Fairer Newham	BFN1 Spatial Strategy					BFN 1.4	Important that people understand what 15 minute neighbourhoods really are - and not to listen to the conspiracy theories! These are essential to help reduce car dependency and improve connectivity	Comment noted. You can read more about this concept in the Local Plan (spatial strategy and neighbourhoods section) and the characterisation study (page 135). To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-115	Resident	Reg18-T-115/001	Building a Fairer Newham	BFN1 Spatial Strategy			1			<p>[Change it] The local plan links many policies to the concept of 15 minute neighbourhoods. Whilst this is generally a robust concept it fails to reflect the way in which we as residents use the borough. Most people live between town centres and town centres themselves offer different services and facilities.</p>	<p>Comment noted. The idea of 15 minute neighbourhoods is to ensure that all residents can live within a 15-minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities and parks and by creating new routes to increase access to existing facilities. You can read more about this concept in the Local Plan (spatial strategy and neighbourhoods section) and the characterisation study (page 135). To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-115	Resident	Reg18-T-115/002	Building a Fairer Newham	BFN1 Spatial Strategy			6			[Change it] Attention should also be given in policies relating to infrastructure to how to improve connections between neighbourhoods.	A change to this policy has been made to better reference the need for improved local walking and cycling connections. Please see the new wording in BFN1 part 6.
Reg18-T-115	Resident	Reg18-T-115/003	Building a Fairer Newham	BFN1 Spatial Strategy			6			[Change it] [Attention should also be given in policies relating to infrastructure to how to improve connections between neighbourhoods.] This is particularly important in access to open spaces. Many parts of the borough are consistent areas of low rise victorian and edwardian housing with little open space provision. There are few opportunities to provide new open spaces within these areas due to the relative lack of large development sites or publicly owned land. In these areas residents rely on travelling to neighbouring areas - beyond the 15 minute neighbourhood concept.	The Green and Water Infrastructure Study includes actions to improve green links in all neighbourhoods to improve routes and links between different open spaces. These have been incorporated into the Neighbourhood policies.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/001	Building a Fairer Newham	BFN1 Spatial Strategy						[Please provide your comments on the Characterisation Study below.] General comment: The 15-minute neighbourhood needs more explanation to highlight the interaction of wider urban infrastructure needs. I feel this is a considerable weakness for its conclusions as the 15 minute framework is not used effectively to evaluate deficits .	Comment noted. The 15-minute neighbourhood concept is explained in the Local Plan (page 299) and the characterisation study (page 135). It is also used as a framework to access deficits within the Characterisation Study and across all the Local Plan evidence base documents assessing social infrastructure provision, including the Green and Water Infrastructure Study, the Community Facilities Needs Assessment, the Build Leisure Needs Assessment and the Town Centre Network Review Methodology Paper. Further details are provided in each of those documents.
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/003	Building a Fairer Newham	BFN1 Spatial Strategy						[Please provide your comments on the Characterisation Study below.] The tenure of residents and effect of low income households is also not evaluated in its effects and additional supports for community wellbeing.	Comment noted. Chapter 5 of the Characterisation Study considers the impact of various socio-economic factors, including tenure and income and concludes there is an increased need for community facilities.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-092	Royal Docks	Reg18-E-092/006	Building a Fairer Newham	BFN1 Spatial Strategy			3.d			BFN1 (3d) – Office floorspace – further to our points below on Silvertown Quays, the approach to office use outside of Stratford needs to recognise the scale of the Silvertown Quays development site, it’s unique context and the need for an appropriate critical mass. This is set out in the recent planning application made for the site.	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is based on evidence of need established within the Employment Land Review.
Reg18-E-092	Royal Docks	Reg18-E-092/007	Building a Fairer Newham	BFN1 Spatial Strategy			1.4			BFN1 (4) – Retail floorspace – any policy approach to retail floorspace needs to be mindful of the relevance of critical mass and scale in creating successful communities. The ambitions of 15-minute neighbourhoods needs to be properly reflected in the allocation of retail within new developments.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-092	Royal Docks	Reg18-E-092/008	Building a Fairer Newham	BFN1 Spatial Strategy			1.5b			BFN1 (5b) – several new schools are proposed in the Royal Docks. These are essential but must not be delivered independently by different development sites – there needs to be an agreed plan and phasing approach driven by existing unmet local need and projected new need. We would welcome a discussion with the LBN Education Team to agree a coordinated approach to both delivery and funding.	Comment noted. LBN Planning work closely with LBN Education through the development of the annual Pupil Place Planning report and the Infrastructure Delivery Plan. This ensures coordinated and timely delivery of required infrastructure.
Reg18-E-092	Royal Docks	Reg18-E-092/009	Building a Fairer Newham	BFN1 Spatial Strategy						This [coordinated delivery of new schools] should be considered as part of a wider review and implementation plan for Social Infrastructure in the OA.	The evidence base documents relating to social infrastructure and the Infrastructure Delivery Plan coordinate the delivery of infrastructure across the borough.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-092	Royal Docks	Reg18-E-092/010	Building a Fairer Newham	BFN1 Spatial Strategy			5.d			BFN1 (5d) – the provision of open space should be central to the masterplan led approach to development. However, setting specific general minimums may result in lower quality provision rather than a bespoke, master-planned outcome.	Changes to this policy approach have been made to reflect the latest evidence base. Please see the new wording in BFN1. The Green and Water Spaces Strategy outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough.
Reg18-E-092	Royal Docks	Reg18-E-092/011	Building a Fairer Newham	BFN1 Spatial Strategy			5.e			BFN1 (5e) – we are not aware that pre-application discussions on Silvertown Quays have prioritised the need for a new leisure centre on the site. It would be helpful to understand how this assessment has been reached (in terms of need) and why the decision has been made to target the new provision at Silvertown. We would welcome a discussion about how sports and leisure provision in the Royal Docks can be assessed in the round and alternative options explored. The current draft of the policy in respect of Silvertown Quays is not supported.	This policy approach has now changed due to reflecting the latest findings from the Built Leisure Needs Assessment. Please see the new wording in BFN1.5.

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Reg18-E-092	Royal Docks	Reg18-E-092/012	Building a Fairer Newham	BFN1 Spatial Strategy			6			BFN1 (6) – we suggest that specific reference to the Royal Docks Corridor scheme is made here.	A change to this policy has been made to better reference the need for improved local walking and cycling connections. This will include corridor schemes, including the Royal Docks Corridor Scheme. Please see the new wording in BFN1 part 6.
Reg18-E-092	Royal Docks	Reg18-E-092/013	Building a Fairer Newham	BFN1 Spatial Strategy			7			BFN1 (7) – we suggest that a specific reference to supporting reinforcement, expansion and decarbonisation of the borough’s infrastructure should be made here.	A change to this policy has been made to reference the need for improvements to the infrastructure network. Please see the new wording in BFN1 part 7.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/006	Building a Fairer Newham	BFN1 Spatial Strategy			3.a			<p>2. Spatial Strategy</p> <p>a. Draft Policy BFN1 (Spatial strategy)</p> <p><u>SEGRO supports the approach set out in part 3(a) of draft Policy BFN1</u> to protect and intensify the borough's Strategic Industrial Land ('SIL') and Local Industrial Locations ('LIL') for a diverse range of industrial and storage, logistics and distribution and related uses. However, it is important to be cognisant of the fact that there can be challenges with intensification in respect of some sites and uses. We set out further commentary below (see the 'Industrial' section) in respect of the plan's assumptions regarding the intensification of industrial land.</p>	Support noted.
Reg18-E-116	SEGRO Plc	Reg18-E-116/007	Building a Fairer Newham	BFN1 Spatial Strategy			3.b			<p><u>SEGRO supports part 3(b) of the draft Policy</u> which directs employment-led development to the borough's MixedUse Areas to deliver light industrial, offices and workspace</p>	Support noted.

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Reg18-E-116	SEGRO Plc	Reg18-E-116/008	Building a Fairer Newham	BFN1 Spatial Strategy			3.e			SEGRO supports part 3(e) of the draft Policy that requires new industrial and employment floorspace on a range of specified site allocations.	Support noted.
Reg18-E-116	SEGRO Plc	Reg18-E-116/009	Building a Fairer Newham	BFN1 Spatial Strategy			3.f			SEGRO supports the approach set out in part 3(f) of draft Policy to support the intensification of out-of-centre retail and leisure parks for industrial uses. These sites are currently underutilised but are well-located for industrial and logistics uses.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/009	Building a Fairer Newham	BFN1 Spatial Strategy			5			Sport England welcome the stance of protecting and enhancing existing parks and community facilities and supporting the creation of new parks and community facilities as this would provide opportunities for communities to be active,	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/010	Building a Fairer Newham	BFN1 Spatial Strategy			5e			however the delivery of the new leisure centres cited should be informed by the emerging evidence base therefore allocating new provision at this stage could be open to challenge. This matter, however, should be resolved once the emerging strategies are completed and the recommendations etc. inform the Local Plan.	Comment noted. The regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest leisure allocations.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/011	Building a Fairer Newham	BFN1 Spatial Strategy						Sport England would, however, like to highlight that there is no mention of any other sporting infrastructure and would like to stress that it is not only leisure centres where communities play sport or are physically active therefore it is recommended that other key needed sport infrastructure identified in the emerging strategies are also highlighted in FN1. [BFN1]	Comment noted. The Built Leisure Needs Assessment assesses a range of sports provision - covering all those with a per head of population target as well as some locally prioritised sports. Now this has been completed, this has informed the Local Plan where relevant.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/038	Building a Fairer Newham	BFN1 Spatial Strategy			1			Overall, the Berkeley Group supports the proposed spatial strategy which seeks to direct development to all of Newham's 16 neighbourhoods to distribute the benefits of growth (part 1) and to direct significant levels of growth to the five neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (part 1 (a) (i)) as well as the N7 Three Mills neighbourhood, which forms part of the cross boundary Poplar Riverside Opportunity Area (part 1 (a) (ii)). We consider this to align with the spatial strategy set out in the adopted London Plan, which is welcomed.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/039	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			Incremental change within neighbourhood N13 East Ham by enhancing each neighbourhood's character and transforming site allocations to deliver new homes (part 1 (a) (iii)) is also supported.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/040	Building a Fairer Newham	BFN1 Spatial Strategy			2			The objective for development to make the best use of land and optimise sites by applying a design-led approach, supporting tall buildings in the designated Tall Building Zones and conserving the borough's heritage assets and settings is also supported and considered to align with the London Plan.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/041	Building a Fairer Newham	BFN1 Spatial Strategy			3.e			<p>With reference to point 3(e), which requires new industrial and employment floorspace on N1.SA1 Beckton Riverside, the Berkeley Group would note that in line with the site allocation for N1.SA1 Beckton Riverside, there is a requirement for mixed use development that is likely to be residential led and non-residential uses may not be limited to employment floorspace. It is also unlikely that new industrial floorspace will be delivered outside of the retained SIL at Beckton Riverside on the basis that the area of retained SIL represents a significant part of the Site in particular being occupied in part by the existing DLR depot and warehousing and logistics uses. Furthermore, whilst the Royal Docks and Beckton Riverside OAPF notes that light industrial uses could be located to the north of the existing DLR depot to act as a buffer for any new residential uses figure 4.53 of the OAPF still shows most of this area identified for mixed use development.</p> <p>The Berkeley Group proposed amendments to draft policy wording: 3. Development will create new jobs and deliver a modern, greener and inclusive economy by:</p> <p>e. requiring new industrial and employment floorspace on N1.SA1 Beckton Riverside, N2.SA1 North Woolwich Gateway, N3.SA1 Silvertown Quays, N3.SA2 Lyle Park West, N3.SA3 Connaught Riverside, N3.SA4 Thameside West, N4.SA1 Royal Albert North, N5.SA2 Silvertown Way East, N5.SA3 Canning Town Holiday Inn, N5.SA5 Canning Town Riverside, N7.SA2</p>	<p>This policy approach has now changed to reduce confusion caused by referring to industrial and employment uses, as industrial uses are a form of employment uses. Please see the new wording in BFN1. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate as Beckton Riverside Site Allocation contains, as your representation notes, a large section of SIL and significant opportunities for employment uses, in particular to buffer the sewage works.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Parcelforce, N7.SA3 Sugar House Island, N8.SA1 Stratford Central, N8.SA2 Stratford Station, N8.SA3 Greater Carpenters District, N8.SA4 Stratford High Street Bingo Hall, N8.SA7 Rick Roberts Way, N8.SA9 Pudding Mill, N8.SA10 Chobham Farm North, N11.SA1 East Beckton Town Centre, N14.SA1 Queen's Market and N15.SA2 Woodgrange Road West; and	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/042	Building a Fairer Newham	BFN1 Spatial Strategy			5.c			Whilst the Berkeley Group fully support the need to deliver the necessary infrastructure to support new development in the form of parks and community facilities such as schools and health centres, with reference to part 5 of draft Policy BFN1 we consider that community facilities such as schools or health centres are only required where there is an identified need. The Berkeley Group proposed amendments to draft policy wording: 5. Development will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities by: b. delivering new schools on N1.SA1 Beckton Riverside, N3.SA1 Silvertown Quays, N3.SA3 Connaught Riverside, N4.SA4 Thameside West and N8.SA7 Rick Roberts Way, N11.SA3 Royal Road site allocations; and c. delivering new health centres on N8.SA1 Stratford Central, N8.SA9 Pudding Mill, N7.SA2 Parcelforce, N5.SA6 Custom House	A change to this policy approach has not been made. We did not consider this change to be appropriate as policy CF4 outlines how Education and Childcare Facilities will be secured and linked to relevant site phasing.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Phase 1, N2.SA2 Rymill Street, N1.SA1 Beckton Riverside, N4.SA4 Thameside West and N14. SA1 Queen's Market site allocations <u>where there is an identified need at the time of delivery</u> ; and	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/043	Building a Fairer Newham	BFN1 Spatial Strategy			5.d			[Whilst the Berkeley Group fully support the need to deliver the necessary infrastructure to support new development in the form of parks and community facilities such as schools and health centres, with reference to part 5 of draft Policy BFN1 we consider] that the specific requirement for at least 2ha of new Local Parks must be weighed in the balance with other planning considerations and requirements as well. The Berkeley Group proposed amendments to draft policy wording: 5. Development will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities by: ...d requiring the delivery of new open space on the majority of site allocations with new Local Parks of at least 2ha required , on the N5.SA4 Limmo, N1.SA1 Beckton Riverside, N4.SA4 Thameside West, N4.SA1 Royal Albert North, N7.SA2 Parcellforce, N3.SA1 Silvertown Quays, N7.SA1	Changes to this policy approach have been made to reflect the latest evidence base. Please see the new wording in BFN1. The change you have suggested has not been made as we did not consider it to be appropriate. The Green and Water Spaces Strategy outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Abbey Mills site allocations and creating public access to the Metropolitan Open Land at the N13.SA3 Former East Ham Gas Works site allocation; and	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/365	Building a Fairer Newham	BFN1 Spatial Strategy			5.e			The Berkeley Group proposed amendments to draft policy wording: e. requiring the delivery of new leisure centres on N1.SA1 Beckton Riverside and N3.SA1 Silvertown Quays site allocations and supporting the delivery of a new leisure centre in the N5 Custom House and Canning Town neighbourhood and through upgrading and redeveloping Newham Leisure Centre (as part of site allocation N10.SA3), <u>where there is an identified need at the time of delivery.</u>	A change to this policy approach has not been made. We did not consider this change to be appropriate as the need for Leisure Centres, linked to growth in parts of the borough has been assessed by the Built Leisure Needs Assessment. Further guidance on the delivery, phasing and interdependencies is provided in the relevant Neighbourhood policies and Site Allocations.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/006	Building a Fairer Newham	BFN1 Spatial Strategy						Stratford East support the principles of directing significant levels of growth to the Stratford and Maryland neighbourhood where Stratford Waterfront and Bridgewater Triangle will provide a significant contribution of housing growth in the coming years.	Support noted.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/007	Building a Fairer Newham	BFN1 Spatial Strategy			2			<p>Optimising site capacities through a design-led approach as set out in Part 2 of the policy is important to ensure the most accessible locations, such as Stratford Metropolitan Centre and its surrounds, make significant contributions to housing delivery...</p> <p>However, this approach needs to be carried through other housing and design policies to allow flexibility for optimising sites in highly accessible areas, where housing needs are different to other parts of the borough and to respond to site constraints.</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/009	Building a Fairer Newham	BFN1 Spatial Strategy					BNF 1.3	TLS strongly support the below statement and see it is as encapsulating the correct approach which reflected throughout the plan. <i>BFN1.3 To deliver Newham's regional economic role as a key location for industrial land, the Plan seeks to consolidate and optimise our remaining industrial sites to deliver modern, intensified, high quality workspaces and ensure they are suitably buffered from residential areas by lighter industrial and workshop uses.</i>	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/008	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			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.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/009	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i			We suggest amending the wording of part 1a ii [sic], replacing 'supported by an extension to the DLR' with ' <u>unlocked by an extension to the DLR</u> '.	This wording change has been made. Please see the new wording in BFN1.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/011	Building a Fairer Newham	BFN1 Spatial Strategy			1			<p>Representations on Draft Local Plan Policies Draft Policy BFN1</p> <p>BFN1 identifies that of the 16 neighbourhoods of Newham, significant levels of growth will be directed to the five neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (RDOR OA), which has potential to deliver 30,000 new homes and 41,50 new jobs up to 2041, as well as neighbourhoods along the River Lea and around Stratford station.</p> <p>TTLP strongly supports the Council's spatial strategy of creating well-connected 15-minute neighbourhoods to achieve Community Wealth Building. Support for the optimisation of sites through the design-led approach to make the best use of land and meet housing, employment, retail and leisure needs is welcomed, as is the support to deliver improved strategic and local connections.</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/013	Building a Fairer Newham	BFN1 Spatial Strategy			5.d			TTLP also recognise the role that the delivery of quality public open space provision can play as part of the Borough's spatial strategy, particularly in areas which are currently deficient. It is noted that Policy BFN1 Part 5.d. identifies that the majority of site allocations will be required to deliver 'Local Parks' of at least 2ha in size, including at Limmo, Beckton Riverside, Thameside West, Royal Albert North, Parcellforce, Silvertown Quays and Abbey Mills. No updated evidence base document relating to open space provision has been published to support the draft Local Plan, and therefore the justification behind the requirement is not clear, and the specific requirement for a Local Plan is not fully robust.	Changes to this policy approach have been made to reflect the latest evidence base. Please see the new wording in BFN1. The Green and Water Spaces Strategy outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/015	Building a Fairer Newham	BFN1 Spatial Strategy			5.d			This leads us to question whether a specific requirement for a single 'Local Park' is too restrictive as a definition. At present the existing Site Allocation N5.SA4 includes a requirement to deliver open space, rather than a Local Park. We therefore request that references to a 2ha Local Park throughout the draft plan be re-phrased to reference 2ha of Public Open Space.	Changes to this policy approach have been made to reflect the latest evidence base. Please see the new wording in BFN1. The Green and Water Spaces Strategy outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-102	Unibail-Rodamco-Westfield	Reg18-E-102/003	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			Support for the ambition and objectives of the draft Plan to direct significant growth to Stratford, deliver mixed use development including housing and the aspiration for Stratford to become an International town centre We welcome the objectives of draft Policy BFN1 (Spatial strategy) to direct significant levels of growth to the N8 Stratford and Maryland neighbourhood and to make the best use of land by supporting tall buildings in Tall Building Zones.	Support noted.
Reg18-E-054	University College London	Reg18-E-054/002	Building a Fairer Newham	BFN1 Spatial Strategy			1.a.i ii			UCL is supportive of the overall aims set out in the spatial strategy. UCL is located within Neighbourhood N8 Stratford and Maryland, and UCL welcome mention in draft Policy BFN1 (1)(a)(iii) that LBN seek to develop community and growth in Newham by “directing significant levels of growth to...the N8 Stratford and Maryland neighbourhood”, therefore recognising the key role of the neighbourhood in which UCL East is located.	Support noted.

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Reg18-E-054	University College London	Reg18-E-054/003	Building a Fairer Newham	BFN1 Spatial Strategy			4			UCL also supports the aim of draft Policy BFN1(4) to ensure “development will meet the retail and leisure needs of residents, workers and visitors by...creating new Local Centres in the N8 Stratford and Maryland neighbourhood”. As UCL East continues to be delivered, it is expected that the development will contribute to these Local Centre aims.	Support noted.
Reg18-E-127	West Ham United FC	Reg18-E-127/004	Building a Fairer Newham	BFN1 Spatial Strategy						Although it is recognised that the site sits within an Opportunity Area, and the Characterisation Study refers to the area around the Stadium as an ‘ Enhance Area – an area of moderate uplift and intensification of built density ’, this should be referred to more specifically in the Plan including at Policy BFN1, Spatial Strategy . This could take many forms and WHUFC would like to work closely with the Council and the local community to ensure that this potential is explored and built upon.	Comment noted. Unfortunately, further engagement with West Ham has not yet been possible. It is unclear what opportunities are proposed at the Stadium so no changes have been made.

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Reg18-E-127	West Ham United FC	Reg18-E-127/007	Building a Fairer Newham	BFN1 Spatial Strategy			2			We note and support the statement at Policy BFN1.2 that development should optimise the use of available sites – referring to the London Plan which says that the Olympic Legacy Opportunity Area can deliver the most new homes and jobs of all areas across London, referring to the role of the Elizabeth Line in particular as a key investment to help deliver this opportunity.	Support noted.
Reg18-K-001	Abrdn	Reg18-K-001/006	Building a Fairer Newham	BFN2 Co-designed masterplanning						Support the principles of Policy BFN2.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/007	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			Anchor would like to deliver housing for older people on the cleared site adjacent to Stanley Holloway Court within the next five years. While proposed Policy BFN2 does not entirely preclude the piecemeal delivery of site allocations, criterion 2 would prevent Anchor from submit a planning application for the development until a co-designed masterplanning exercise has been undertaken. Given the extensive criteria for the masterplanning exercise, including community consultation, this requirement could not be delivered by Anchor independently and may not be resourced by Newham until the earlier phases have been progressed. This policy would therefore prevent the cleared site from coming forward for development despite the fact that it could meet identified needs for housing for older people without prejudicing the future development of the wider allocation. To ensure that the policy is effective and that housing needs are met, a more flexible approach to Policy BFN2 should be taken.	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land. Coordination between different landowners is considered a key benefit of this policy.

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Reg18-E-070	Aston Mansfield	Reg18-E-070/046	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			<p><i>b. BNF2: Co-designed Masterplanning - Would you keep, change or add something to this policy?</i></p> <p><i>1. Sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the neighbourhood and/or site vision and/or design principles or where the timing of delivery would be unsupported by infrastructure.</i></p> <p>Support and recognise the importance of comprehensive masterplanning.</p>	Support noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/047	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			<p><i>2. All major applications and applications on site allocations must undertake co-designed site masterplanning.</i></p> <p><i>This masterplanning must consider all of the following:</i></p> <p><i>a. how the required land uses and infrastructure provision on the site will be delivered.</i></p> <p><i>b. relevant neighbourhood and/or site allocation design principles.</i></p> <p><i>c. integration of the scheme with its wider surroundings.</i></p> <p><i>d. delivery of key walking and cycling connections within the site and to and from key local facilities.</i></p> <p><i>e. layout of the site to ensure neighbourliness.</i></p> <p>Whilst the desire to engage with the varied social groups within the borough is recognised and supported, we Object to this policy as currently worded, which is too broad within its requirements, does not set out how co-designed</p>	Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the Statement of Community Involvement (SCI) is already referenced in the implementation text for BFN2.2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>masterplanning will work in practice, particularly for larger sites and how this is evidenced as part of the application process.</p> <p>Suggested change to wording:</p> <p><i>2. All major applications and applications on site allocations must engage with undertake co-designed site Masterplanning as underpinned by the engagement principles contained within the Newham Statement of Community Involvement.</i></p> <p><i>3) Masterplanning must consider all of the following:</i></p> <ul style="list-style-type: none"> <i>a. how the required land uses and infrastructure provision on the site will be delivered.</i> <i>b. relevant neighbourhood and/or site allocation design principles.</i> <i>c. integration of the scheme with its wider surroundings.</i> <i>d. delivery of key walking and cycling connections within the site and to and from key local facilities</i> <i>e. layout of the site to ensure neighbourliness.</i> <i>f. how Biodiversity Net Gain will be delivered on site, natural features will be incorporated and environmental factors mitigated..</i> 	

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Reg18-E-070	Aston Mansfield	Reg18-E-070/048	Building a Fairer Newham	BFN2 Co-designed masterplanning			3			<p><i>3. All masterplans should demonstrate how the site will support the delivery of all of the following objectives:</i></p> <ul style="list-style-type: none"> <i>a. increased opportunities for social interaction.</i> <i>b. mixed, balanced and stable communities.</i> <i>c. environments which support good physical and mental health.</i> <i>d. spaces young people can thrive in.</i> <i>e. zero carbon, climate resilient neighbourhoods.</i> <i>f. buildings and public spaces whose use and design reflects and meets the needs of Newham's diverse population.</i> <i>G Community Wealth Building.</i> <p>Support the desire for masterplans to provide for social interaction, mixed, balanced and stable communities and young people, and to demonstrate Community Wealth building.</p> <p>Object to the policy as currently worded with a lack of clarity within the policy as how these aims will be evidenced within the application process. The policy also requires clarity as to the size of scheme for which its requirements apply.</p> <p>Suggested change to wording:</p> <p><i>3. All [delete:masterplans] major applications and applications on site allocations should</i></p>	<p>This change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with changes to reflect the new Plan's objectives and updated legislative requirements) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development. This will then be secured through the development management process. We consider the policy sufficiently clear in indicating which scale of sites should provide a masterplan (part 2) and then what the master plan should deliver (part 3).</p>

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										<p><i>demonstrate how the site will support the delivery of all of the following objectives:</i></p> <ul style="list-style-type: none"> <i>a. increased opportunities for social interaction through the provision of community space.</i> <i>b. mixed, balanced and stable communities through incorporating an appropriate range of tenures and sizes of home .</i> <i>c. environments which support good physical and mental health through the provision of well-designed homes and outdoor spaces.</i> <i>d. spaces young people can thrive in.</i> <i>e. zero carbon, climate resilient neighbourhoods.</i> <i>f. buildings and public spaces whose use and design reflects and meets the needs of Newham’s diverse population.</i> <p><i>G Community Wealth Building</i></p>	

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Reg18-E-148	City of London	Reg18-E-148/010	Building a Fairer Newham	BFN2 Co-designed masterplanning						We support the principles of Draft Policy BFN2 (Co-designed masterplanning) which seeks to ensure that sites are developed comprehensively through a masterplan-led approach to help enable the delivery of the following objectives: a. increased opportunities for social interaction; b. mixed, balanced and stable communities; c. environments which support good physical and mental health; d. spaces young people can thrive in; e. zero carbon, climate resilient neighbourhoods; f. buildings and public spaces whose use and design reflects and meets the needs of Newham’s diverse population; and g. Community Wealth Building.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/066	Building a Fairer Newham	BFN2 Co-designed masterplanning						We welcome this strategic policy concerning the comprehensive design and development of large sites and major applications.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/067	Building a Fairer Newham	BFN2 Co-designed masterplanning			2.f			We are especially pleased to see policy requirement BFN2.2.f. ensuring biodiversity net gain will be delivered on site.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/068	Building a Fairer Newham	BFN2 Co-designed masterplanning			3.e			Additionally, we are pleased to see policy requirement BNF2.3.e., committing masterplans to delivering zero carbon and climate resilient neighbourhoods, including the need to consider flood prevention measures.	Support noted.

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Reg18-E-145	Environment Agency	Reg18-E-145/069	Building a Fairer Newham	BFN2 Co-designed masterplanning					BFN 2.2	In reference to implementation section BNF2.2, we support the policy's commitments to engagement, especially with local residents in co-designing site masterplans. There is an opportunity here to also mention key stakeholders, such as the Environment Agency, who developers should be encouraged to proactively engage with regarding the environmental constraints and infrastructure required for masterplans.	This wording change has been made. Please see the new wording in the implementation text of BFN2.2.
Reg18-E-131	Friends of Queens Market	Reg18-E-131/011	Building a Fairer Newham	BFN2 Co-designed masterplanning						Policy conforming to this Policy it is not stated what "co-designed masterplanning" means. In our experience, co-design / co-create are just buzz-words, as consultations are simply presentations of the Council's ideas. The people are not asked for their ideas, or their ideas are not listened to: the Council doesn't know how to really engage.	A change to this policy approach has not been made. We did not consider this change to be appropriate as such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development.

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Reg18-E-131	Friends of Queens Market	Reg18-E-131/012	Building a Fairer Newham	BFN2 Co-designed masterplanning					BNF 2.2	This policy should contain some best practice policy for engagement within BNF2.2 or elsewhere (we doubt that this is contained in the SCI)	A change to this policy approach has not been made. We did not consider this change to be appropriate as such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development.
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/006	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			<p>Co-designed masterplanning</p> <p>The benefits of comprehensive masterplanning and development are acknowledged, however we have a number of concerns regarding the implementation of Policy BFN2: Co-designed masterplanning. The principle of piecemeal delivery is understood, however it is not clear what is meant by 'piecemeal development' in the context of Policy BFN2. A number of strategic site allocations and designated sites within the Local Plan are either subject to multiple site ownerships, leaseholders or, by virtue of their size, typically come forward as phased developments.</p> <p>Across Newham there are allocated and designated sites with multiple site ownerships, leaseholders, or by owing to their size are dependent on transformative transport</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										measures such as the proposed DLR extension, where it may not be possible to deliver the Site comprehensively and development will inevitably be delivered over a longer period of time. This should not preclude development coming forward on parts of the site which are more readily available for development in the short-term, subject to such schemes not prejudicing the ability for neighbouring sites to be developed in the future. Rather, a more proportionate approach should be taken and the resistance to piecemeal development in the policy wording should be removed.	
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/007	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			<p>Part 2 of Policy BFN2 requires all major applications to undertake co-designed site masterplanning exercise, taking into account how the required land uses and infrastructure provision on the site will be delivered; relevant neighbourhood and/or site allocation design principles; integration of the scheme with its wider surroundings; delivery of key walking and cycling connections within the site and to and from key local facilities; layout of the site to ensure neighbourliness and how BNG will be delivered.</p> <p>The principle of recognising the existing and emerging context is supported, but in line with the above comments, land leases and other site constraints may preclude the ability to undertake comprehensive co-design and masterplanning. This should therefore not be an explicit policy requirement. The site allocations</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with changes to reflect the new Plan's objectives and updated legislative requirements) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development. This will then be secured through the development management process. The draft Plan does provide a greater level of detail on site allocations, than the

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										themselves, the Local Plan design policies, as well as strategic policy documents such as the Opportunity Area Planning Framework adequately ensure that development is appropriately designed having regard to its wider context. Further to this, the need to ensure a site contributes to the wider context and neighbourhood can be secured via the planning application process and is not explicitly needed to be set out in the Local Plan.	adopted Plan, which will support, but doesn't replace the need for, master planning.
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/018	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			We believe Policy BFN2 overlooks the fact that number of strategic site allocations and designated sites within the Local Plan are either subject to multiple site ownerships, leaseholders or, by virtue of their size, typically come forward as phased developments. This should not preclude any development coming forward on sites where some parts of the Site are more readily available for redevelopment. Rather, a more proportionate approach should be taken, requiring development to not prejudice surrounding sites, and the resistance to piecemeal development in the policy wording removed.	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land.

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Reg18-E-093	Greater London Authority	Reg18-E-093/007	Building a Fairer Newham	BFN2 Co-designed masterplanning						The Mayor also welcomes a very clear approach set out in Policy BFN2 for major applications for co-designed masterplanning to ensure the delivery of Newham's key objectives.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/058	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			Hadley supports the approach of Policy BFN2.2 to "undertake co-designed masterplanning". However, it suggests that the policy would be improved by providing clarity about what is meant by "co-designed" and how the process should take place to best involve members of local communities and other stakeholders, and the role of LBN in facilitating co-design for planning applications for major developments and site allocations.	Support noted. This change to this policy approach has not been made. We did not consider this change to be appropriate as such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development. A small change has been made to the wording to better consider equalities considerations. Please see new wording in the implementation text of BFN2.2.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/060	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			<p>Hadley is broadly supportive of the principle of BFN2.4 which states that a Meanwhile Use Strategy should be submitted for parts of sites that will remain vacant or underused for more than three years while the site is being redeveloped.</p> <p>Hadley has an extensive meanwhile use strategy in place for IQLN which includes the reuse of a former marketing suite to provide a temporary community centre alongside a temporary community garden. This will help activate the site, and Hadley is encouraged by the supportive stance for meanwhile uses throughout the DLP.</p> <p>Hadley suggests that clarity is provided in the policy about whether the Meanwhile Use Strategy is a freestanding deliverable for planning applications, or whether it can be included with another document, such as the Design & Access Statement or Planning Statement.</p> <p>Hadley is concerned that the number of validation requirements has increased in recent years, so there should be flexibility in how the approach to meanwhile uses is set out within each planning application.</p>	Support noted. A change to this policy approach has not been made. We did not consider this change to be appropriate as this adds complexity to the validations process.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/064	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			Hadley requests that further clarification is provided on the purpose of the requirement set out in BFN2.5 for all developments on site allocations to undertake post occupancy surveys and what the results of the survey will be used for.	A change to this policy approach has not been made. We did not consider this change to be necessary as an explanation of what would be monitored and its purpose is already included in the implementation text for BFN2.5. The use and review of these surveys would be by the Policy Team.
Reg18-E-147	Historic England	Reg18-E-147/017	Building a Fairer Newham	BFN2 Co-designed masterplanning			2.c			Add at end of sentence 'including any affects on the historic environment where appropriate'	This wording change has been made (some changes for accuracy). Please see the new wording in the implementation text of BFN2.2c.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-106	Home Builders Federation	Reg18-E-106/004	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			<p>Post-occupancy surveys. We would question the wisdom of this. This is intrusive on the residents themselves and hard to conduct by the housebuilder. If the development is a market scheme then a housebuilder's interest in the site / dwelling will be severed once the home is sold. It is difficult to see how this information can be collected by the housebuilder post occupancy, and what the grounds for enforcement would be for the council.</p> <p>Given the other severe challenges facing the local authority relating to housing we recommended that this requirement is dropped. The money and energy involved would be better directed towards other objectives.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives.
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/006	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			<p>The wording of the masterplanning requirement under Draft Policy BFN2 (Co-designed masterplanning) is currently inflexible taking into consideration the eventual delivery process of development sites. In many cases, the Council's identification of the strategic allocations do not take into account that there are often multiple landowners who would be required to input into the masterplanning process. Where this is the case, it is not unusual for timings for delivery to be impacted by matters such as the site's suitability, achievability and viability, which would render bringing individual sites within an allocation forward at the same time impossible. In this regard, the wording of policy BFN2 should be flexible to not prejudice the delivery of much-needed homes on sites which are ready to come forward for development before others. The</p>	This change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										masterplanning process should not slow down site delivery, specifically where matters can be dealt with in the decision-making process of a planning application.	
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/007	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			Greater clarity should also be given to the weight to be attached to this exercise in the decision-making process. Development within such a location would need to be mindful of the wider context in any circumstances where there are cumulative technical and design considerations. In our opinion, an indicative masterplan would hold only limited weight in the overall determination of a planning application.	This change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It is a key tool to demonstrate that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development. This will then be secured through the development management process. The policy in the current Plan has been used to resist premature and uncoordinated development.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/003	Building a Fairer Newham	BFN2 Co-designed masterplanning						<p>4. Detailed comments</p> <p><u>Building a fairer Newham</u></p> <p>We support the Council's aspiration to ensure sites are comprehensively designed and fully integrated into areas, using the co-design site masterplanning approach (Policy BF2). However, we do have reservations about the requirement for co-design work to take place in advance of pre-application discussions. In some cases, this can be premature, particularly on commercially sensitive sites. A revision to the wording of this requirement would make it more effective.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the vast majority of sites can and should be transparent with residents and other stakeholders about proposed future development plans. The implementation text wording is already sufficiently flexible to accommodate those limited circumstances where this is not possible.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/003	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			<p>Similarly, the promotion of co-design in BFN2 and other policies, demonstrates a tangible commitment to embedding community engagement into major development proposals. We recommend further clarity on the terms of engagement, and what is realistically up for discussion given different sizes of site, site constraints, and policy objectives. We recommend that "co-design" and "engagement" should be clearly defined.</p> <p>We welcome the co-design masterplan approach, as this emphasises public engagement at a formative stage which aligns with the Gunning principles and is best practice.</p>	Support noted. This change to this policy approach has not been made. We did not consider this change to be appropriate as such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development. A small change has been made to the wording to better consider equalities considerations. Please see new wording in the implementation text of BFN2.2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/007	Building a Fairer Newham	BFN2 Co-designed masterplanning						We also note and support the advocacy for a co-design and masterplanning approach in Local Plans. We agree that better and fairer development can be delivered with comprehensive masterplanning as it facilitates better land use, design and integration and will help to deliver successfully against Newham's key strategic objective of developing a fairer borough.	Support noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/060	Building a Fairer Newham	BFN2 Co-designed masterplanning						The policy supported.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/061	Building a Fairer Newham	BFN2 Co-designed masterplanning						However, it would benefit from adding a reference to the need for inclusive design, for example as part of 3(f) or an additional point.	This wording change has been made. Please see the new wording in BFN2.3f.
Reg18-E-082	Resident	Reg18-E-082/023	Building a Fairer Newham	BFN2 Co-designed masterplanning				3.6 and 3.7		<ul style="list-style-type: none"> Page.29 (BFN2). Where it discusses co-designed master-planning, there should be more emphasis on the need for the community or residents to be involved. It is critical that at the earliest stages (pre-application) that the community are involved in influencing design, looking at needs and what is likely or unlikely to work in terms of adding positively to the urban fabric of their local neighbourhoods. This is outlined to some extent in BNF2.2 however it should also be outlined in section 3.6/7. 	This wording change has been made. Please see the new wording in paragraph 3.7.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-082	Resident	Reg18-E-082/024	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			Page.33 (BNF2.5). Post occupancy surveys are important ways of finding out whether the developments delivered are of good quality and whether they have met needs identified in the planning application process. It is important that these are published online to facilitate weeding out of bad developers.	Support noted. Analysis of the post-occupancy surveys will be incorporated into future Annual Monitoring Reports for the Local Plan.
Reg18-E-091	Resident	Reg18-E-091/015	Building a Fairer Newham	BFN2 Co-designed masterplanning						Comment 4: Policy BFN2: Co-designed masterplanning: This policy is welcomed given the large-scale re-development that is happening across parts of the borough. Below are some additional requirements that could be usefully added:	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/016	Building a Fairer Newham	BFN2 Co-designed masterplanning						[additional requirements that could be usefully added] Landscape ecology expertise as part of the masterplan process. Ecological expertise should be within the design team from the start and used to inform design decisions. This should not focus only on conserving any valuable species and habitats already present, but also on how to integrate these with delivering the 15min neighbourhoods, opportunities for active travel and outdoor activity for health, wellbeing and community cohesion.	A change to this policy approach has not been made. We did not consider this change to be appropriate for a high-level master planning policy. Further policy direction around biodiversity and habitats is provided in the Green and Water Spaces and Design chapters.
Reg18-E-091	Resident	Reg18-E-091/017	Building a Fairer Newham	BFN2 Co-designed masterplanning			2.f			[additional requirements that could be usefully added] Delivery of habitat corridors for wildlife. How they will be protected, enhanced or created to support and complement the Local Nature Recovery Strategy See Natural England guidance on key design principles for LNRS and how to create them. http://publications.naturalengland.org.uk/publication/5144804831002624	A change to this policy approach has not been made. We did not consider this change to be appropriate for a high-level master planning policy. Further policy direction around biodiversity and habitats is provided in the Green and Water Spaces and Climate Emergency chapters.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/018	Building a Fairer Newham	BFN2 Co-designed masterplanning			2.f			[additional requirements that could be usefully added] Using a new design approach: Termed Animal-aided design https://www.biorxiv.org/content/10.1101/150359v1 may be helpful to design teams to ensure wild species are treated as a stakeholder in the design process. London Wildlife Trust has also produced a number of ecological design typologies to maximise biodiversity through green roofs, green walls and SUDs.	A change to this policy approach has not been made. We did not consider this change to be appropriate for a high-level master planning policy. Further policy direction around biodiversity and habitats is provided in the Green and Water Spaces and Climate Emergency chapters.
Reg18-E-091	Resident	Reg18-E-091/019	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			[additional requirements that could be usefully added] Meanwhile Use Strategy: GLA Meanwhile Research Document: Whilst the GLA and Newham documents are both human-centric it doesn't stop Newham considering suitable options for meanwhile use in the borough, specifically around ecological habitat creation. This would help substantially at filling a time gap between habitat loss and creation. Several European countries have adopted a temporary nature policy to reconcile ecology in densely urban areas. See this research paper published in 2017. https://www.tijdelijkenatuur.nl/Uploaded_files/Zelf/land-use-policy-temporary-nature.68343b.pdf	Support noted. This policy approach has now changed to provide greater clarity on the policy approach to meanwhile uses. Please see the new wording in BFN1.8 and associated implementation text and implementation text of BFN2.4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/020	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			[additional requirements that could be usefully added] Post occupancy surveys: Mandatory BNG will require monitoring surveys post occupancy, that are likely to be repeated several times in the first 5 years, the critical time to get habitats working and then less frequently for the next 30 years. Embedding known BNG requirements into policy now will reduce the retrofit exercise later that is likely to be less effective.	A change to this policy approach has not been made. We did not consider this change to be appropriate as monitoring of Biodiversity Net Gain is addressed in the Green and Water Spaces chapter. Post occupancy surveys will focus on the experience of human occupiers and users of the site.
Reg18-T-126	Resident	Reg18-T-126/001	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-038	Resident	Reg18-T-038/014	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Add to it] Spend more money and cultivate new ideas and ENSURE community engagement on what is likely to happen in the next 10 years by showing how things have changed in the last 10 years, in terms of spaces around them and the air, water and park spaces. They're not all stupids and will see it like they should, and not just rosy new developments, as if land space will keep growing. [Originally submitted in response to W2]	Comment noted. Policy BFN2.2 requires greater engagement on planning applications.
Reg18-T-057	Resident	Reg18-T-057/005	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Add to it] ?	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. Part of the policy have now been changed to add more detail around equalities considerations, inclusive design, the policy's application to all land uses and the delivery of meanwhile uses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-062	Resident	Reg18-T-062/001	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Keep it] all ok	Support noted.
Reg18-T-098	Resident	Reg18-T-098/001	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. Part of the policy have now been changed to add more detail around equalities considerations, inclusive design, the policy's application to all land uses and the delivery of meanwhile uses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-102	Resident	Reg18-T-102/001	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Keep it]	Support noted.
Reg18-T-103	Resident	Reg18-T-103/004	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Change it] Make it widely available	Comment noted. Policy BFN2.2 requires greater engagement on planning applications.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-105	Resident	Reg18-T-105/002	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Keep it]	Support noted.
Reg18-E-092	Royal Docks	Reg18-E-092/014	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			BFN2 (4) – we strongly support the need for Meanwhile Use Strategies as part of the planning application process. However, the Plan should make specific allowance for meanwhile uses in advance of masterplan applications. Encouraging meanwhile uses is important and should be encouraged in parallel with the visioning, design, and master-planning process rather than waiting for the masterplan to be approved. This period can often be a number of years and productive use of the site should be encouraged before largescale permanent development.	Support noted. This policy approach has now changed to provide greater clarity on the policy approach to speculative meanwhile uses. Please see the new wording in BFN1.8 and associated implementation text.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-092	Royal Docks	Reg18-E-092/015	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			We would suggest that for large, multi-phase sites, there is a presumption in favour of meanwhile use; that the meanwhile use may not be the same as the long-term land use allocation or proposal; that the meanwhile use consent should be sufficient in length to enable investment in quality and commercially viable uses.	Support noted. This policy approach has now changed to provide greater clarity on the policy approach to speculative meanwhile uses. Please see the new wording in BFN1.8 and associated implementation text.
Reg18-E-092	Royal Docks	Reg18-E-092/016	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			We would suggest that granting meanwhile use consents for more than five or ten years should be strongly considered to support productive use of the sites. This is particularly important in supporting the creative and cultural sectors.	Support noted. This policy approach has now changed to provide greater clarity on the policy approach to speculative meanwhile uses. Please see the new wording in BFN1.8 and associated implementation text.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/010	Building a Fairer Newham	BFN2 Co-designed masterplanning						<p>3. Design</p> <p>a. Draft Policy BFN2 (Co-designed masterplanning)</p> <p>As written, draft Policy BFN2 would be a requirement for all major applications and all applications on site allocations. This would capture major industrial applications. However, a number of the draft Policy criteria are more suitable for residential and mixed-use development and would not be appropriate for an industrial/logistics development where no residential is being delivered. For example, part 3(d) which refers to “spaces that young people can thrive in”. In addition, part 2(d) in respect of delivering key walking and cycling connections “within the site” may not be appropriate on a large industrial site where operational needs would likely render pedestrian and cycle routes unsafe and unsuitable. Part 4 regarding meanwhile uses may also not be appropriate for large industrial sites.</p> <p><u>If the policy is to apply to all development, SEGRO requests that draft Policy BFN2 be re-framed to be more flexible when applied to industrial/logistics sites reflecting that not all criteria will be appropriate in all cases.</u> Parts 2, 3 and 4 could incorporate use of the phrase ‘where relevant’ and the supporting text could then acknowledge that</p>	<p>This policy approach has now changed due to provide clarity on its applicability to developments providing a range of uses. The Council does not consider industrial sites, or any other uses, unable to consider or deliver the aspects or objectives listed in the policy. They are broad enough principles to be adapted to any site and use specific contexts. Please see new wording in the implementation text of BFN2.2 and BFN2.3 which provides clarity on this point. Regarding Meanwhile Use Strategies, this policy approach has now changed to clarify that delivering meanwhile uses should not prevent work required to deliver the final scheme. However, we consider that all phased schemes should consider what meanwhile uses could be delivered on their sites through a meanwhile strategy. Please see the new wording in the implementation text of BFN2.4</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										the policy requirements may, in some instances (for example for some industrial uses), not be appropriate. It should be acknowledged that industrial typologies have special operational requirements and therefore, some aspects of the policy must be applied flexibly.	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/044	Building a Fairer Newham	BFN2 Co-designed masterplanning						The benefits of comprehensive masterplanning and development are acknowledged, however the Berkeley Group has a number of concerns with the implementation of proposed policy BFN2.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/045	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			<p>The principle of piecemeal delivery is understood however it is not clear what LBN mean by piecemeal development in the context of this policy. A number of strategic site allocations within the Local Plan are either subject to multiple site ownerships or by virtue of their size typically come forward as phased developments. The Twelvetrees Park development and Bromley by Bow gasholder site are an example of a site (allocation) that is in two separate ownerships where one part of the Site was ready to come forward for redevelopment several years before the remaining part of the Site. Similarly, the Beckton Riverside site allocation is subject to multiple site ownerships and owing to the size of the site and dependency on transformative transport measures such as the proposed DLR extension, it may not be possible to deliver the Site comprehensively and will inevitably be delivered over a long period of time. This should not preclude any development coming forward on sites where some parts of the Site are ready for redevelopment and a more proportionate approach should be taken and resistance to piecemeal development removed. In these circumstances a masterplan (with associated Design Code), design led approach can still be followed, without precluding development coming forward at different times by different land owners. The Berkeley Group proposed amendments to draft policy wording: 1. Sites should be designed and developed comprehensively. Piecemeal delivery will be</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										resisted, particularly where it would prejudice the realisation of the neighbourhood and/or site vision and/or design principles or where the timing of delivery would be unsupported by infrastructure.	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/046	Building a Fairer Newham	BFN2 Co-designed masterplanning			2			Part 2 requires all major applications and applications on site allocations to undertake co-designed site masterplanning taking into account how the required land uses and infrastructure provision on the site will be delivered; relevant neighbourhood and/or site allocation design principles; integration of the scheme with its wider surroundings; delivery of key walking and cycling connections within the site and to and from key local facilities; layout of the site to ensure neighbourliness and how BNG will be delivered. The principle of this is supported but in line with the above comments, land ownership and other site constraints may preclude the ability to undertake comprehensive co-design and masterplanning and should not be an explicit policy requirement. The site allocations themselves, the Local Plan design policies, as well as strategic policy documents such as OAPF's adequately ensure that masterplans and	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with changes to reflect the new Plan's objectives and updated legislative requirements) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development. This will then be secured through the development management process. The draft Plan does provide a greater level of detail on site allocations, than the

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	<p>designs are co-ordinated; further to this, the need to ensure a site contributes to the wider context and neighbourhood can be secured via the planning application process and is not explicitly needed to be set out in the Local Plan. The Berkeley Group proposed amendments to draft policy wording: 2. All major applications and applications on site allocations must undertake co-designed site masterplanning. This masterplanning must consider all of the following:</p> <ul style="list-style-type: none"> a. how the required land uses and infrastructure provision on the site will be delivered. b. relevant neighbourhood and/or site allocation design principles. c. integration of the scheme with its wider surroundings. d. delivery of key walking and cycling connections within the site and to and from key local facilities. e. layout of the site to ensure neighbourliness. f. how Biodiversity Net Gain will be delivered on site, natural features will be incorporated and environmental factors mitigated. 	<p>Comment Response</p> <p>adopted Plan, which will support, but doesn't replace the need for, master planning.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/047	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			Part 4 of the policy requires all phased sites, where parts of the site will remain vacant or underused for more than three years, to submit a Meanwhile Use Strategy with the intention of outlining how vacant and underused plots will be activated. Whilst the Berkeley Group support the principle of this aim by virtue of the nature of former gasholder sites, which are typically heavily contaminated, the ability to activate and specifically provide public access to vacant or underused parts of the Site might in some instances be prohibited. This can include for health and safety reasons caused by the presence of contamination or the need to use vacant parts of the Site for other purposes such as storage of gasholders during the refurbishment process. To that end, the requirement for a Meanwhile Use Strategy should have the ability to acknowledge site specific circumstances of sites. The Berkeley Group proposed amendments to draft policy wording: 4. All phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how vacant and underused plots will be activated, <u>where site specific circumstances allow</u> .	This policy approach has now changed to clarify that delivering meanwhile uses should not prevent work required to deliver the final scheme. However, we consider that all phased schemes should consider what meanwhile uses could be delivered on their sites through a meanwhile strategy. Please see the new wording in the implementation text of BFN2.4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/048	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			Part 5 of Policy BFN2 requires all developments on site allocations to undertake a post occupancy survey and share the results with the Council. The Berkeley Group would be happy to discuss the Council's intentions behind this requirement but as currently drafted it is unclear what this would entail and what it would be measuring. The Berkeley Group proposed amendments to draft policy wording: 5. All developments on site allocations are expected to undertake post occupancy surveys <u>[insert explanation of what this is for]</u> [note for policy author this is their edits and not an internal note] and share the results with the Council.	A change to this policy approach has not been made. We did not consider this change to be necessary as an explanation of what would be monitored and its purpose is already included in the implementation text for BFN2.5.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/021	Building a Fairer Newham	BFN2 Co-designed masterplanning						[Appendix A] The draft policy is generally supported, and the hybrid planning application proposals have been developed in line with it.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/022	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			[Appendix A] It does, however, seek additional requirements which are queried: A Meanwhile Use Strategy is a beneficial requirement which aligns to the ambitions of TSP. However, it should be sought following determination of a planning application by way of a planning condition enabling it to become a 'live' document for large strategic sites such as Silvertown. LBN should consider how its own planning application determination processes can support the delivery of timely delivery of meanwhile uses that require temporary planning permission.	Support noted. This policy approach has now changed to provide greater clarity on the how the Meanwhile Use Strategies will be secured. Please see the new wording in the planning obligations and implementation text for BFN2.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/023	Building a Fairer Newham	BFN2 Co-designed masterplanning			5			[Appendix A] Clarification is required in relation to post-occupancy surveys. LBN should explain the envisaged scope of these surveys and should assess whether requiring such surveys would deliver a benefit that would outweigh the administrative burden on its development management officers, who would have to register submissions and presumably assess surveys. Any burden on occupiers also needs to be understood.	A change to this policy approach has not been made. We did not consider this change to be necessary as an explanation of what would be monitored and its purpose is already included in the implementation text for BFN2.5. The use and review of these surveys would be by the Policy Team. Completion of any surveys would be voluntary by occupiers, as per Travel Plan surveys.

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Reg18-E-095	Transport for London	Reg18-E-095/010	Building a Fairer Newham	BFN2 Co-designed masterplanning						TfL has welcomed this approach particularly through the development of existing and new transport infrastructure.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/011	Building a Fairer Newham	BFN2 Co-designed masterplanning					BNF 2.2	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.	This wording change has been made. Please see the new wording in the implementation text of BFN2.2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/016	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			<p>Draft Policy BFN2: Co-ordinated Masterplanning TTLP support the comprehensive masterplanning of strategic sites, in line with draft Policy BFN2, however as currently drafted the policy does not recognise the challenges in delivering comprehensive development where there are numerous landowners or stakeholders. For example, as identified above, the proposed Site Allocation N5.SA4 (Limmo), covers both the Limmo site, as well as open space owned by LBN, and Canning Town Station and Bus Station. These separate elements are unlikely to be delivered together, as there are timescale implications relating to the advanced stage of pre-application discussions on the Limmo site itself, compared to the station site which is not sufficiently progressed to provide a meaningful input into masterplanning these sites in combination. As such the following amendments are requested: ...Update BFN2 Part 1 to read: 'Sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the neighbourhood and/or site vision and/or design principles or where the timing of delivery would be unsupported by infrastructure. Where timescales do not allow for comprehensive delivery, applications should not prejudice the development of other sites in the allocation from delivering the development and design principles of that allocation'.</p>	<p>This change to this policy approach has not been made. We did not consider this change to be necessary as the wording has been retained (with tweaks to reflect the draft Plan's structure) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/019	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			TTLP strongly support Draft Policy BFN2 Part 4 which requires a Meanwhile Use Strategy to be submitted where parts of the site will remain vacant or underused for more than three years to outline how vacant and underused plots will be activated. In large masterplan schemes such as Limmo, which is currently vacant and has substantial costs associated its ongoing security pre-development, it would be helpful to expand support in the draft Local Plan for meanwhile uses, such as markets, events, popup spaces and commercial space.	Support noted.
Reg18-E-054	University College London	Reg18-E-054/004	Building a Fairer Newham	BFN2 Co-designed masterplanning			1			In accordance with draft Policy BFN2, UCL recognise the value of designing and developing site comprehensively, as this has and continues to be the approach taken for the major multi-phase and masterplanned UCL East development. UCL East has adopted the principles listed in draft Policy BFN2(3), including increased opportunities for social interaction, supporting good physical and mental health, and buildings and spaces which reflect Newham's diverse population. UCL consider that Policy BFN2 should include a definition of 'co-design' to ensure the approach for achieving such aspirations are clear. Following the Outline Consent and subsequent Phase 1 RMAs, the design of the plots which form Phase 2 will be developed and secured through RMA consents. This allows UCL to take a tailored approach to each of the developments, taking into account views of the local planning	Support noted. This change to this policy approach has not been made. We did not consider this change to be appropriate as such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development. A small change has been made to the wording to better consider equalities considerations. Please see new wording in the implementation text of BFN2.2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										authority and stakeholders. It is expected that these Phase 2 plots will address the aspirations of this policy.	
Reg18-E-054	University College London	Reg18-E-054/005	Building a Fairer Newham	BFN2 Co-designed masterplanning			4			Draft Policy BFN2(4) states that, "all phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how vacant and underused plots will be activated". UCL is supportive of this policy aim and recognises the value in meanwhile uses in temporarily activating otherwise-vacant plots. UCL has already submitted an Interim Uses Strategy to LLDC as part of the S106 requirements for Phase 1 of the UCL East development. Elements of this strategy are already being implemented in the form of the City Mill Skate development on the Pool Street East plot, which creates skateable architecture accessible to the local community, and is linked to teaching programmes at the university.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/049	Building a Fairer Newham	BFN3 Social Value and HIA						<p>d. BHN3: Social Value and Health Impact Assessment - Would you keep, change or add something to this policy?</p> <p>1. All developments in Newham are encouraged to maximise social value and to make a positive contribution to the health and wellbeing of our communities.</p> <p>2. Major development, and proposals where potential health or social justice issues are likely to arise must undertake a screening assessment as early as possible in the development process, to determine whether a full Social Value and Health Impact Assessment (SV-HIA) is required.</p> <p>3. Where the Screening Assessment identifies that a full SV-HIA is required, then:</p> <p>a. the scope of the SV-HIA must be agreed with the Council's Planning and Public Health departments before it is undertaken by the applicant; and</p> <p>b. applicants will be required to prepare a proportionate SV-HIA as early as possible in the development process. This is to allow the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts</p> <p>Support the aims and aspirations of the policy.</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/065	Building a Fairer Newham	BFN3 Social Value and HIA						Whilst Hadley agrees with the ambition for introducing the requirement for such assessment, it is imperative that LBN has the capabilities and capacity for supporting applicants from pre-application stage through to submission and determination	Comment noted.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/008	Building a Fairer Newham	BFN3 Social Value and HIA						Furthermore, we are encouraged to see priority being giving to maximising health and wellbeing and increasing the level of social value in the borough in line with the comprehensive 50 steps set out in 12 Priorities of the Newham 2020 Health and Wellbeing Strategy.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-149	NHS North East London	Reg18-E-149/003	Building a Fairer Newham	BFN3 Social Value and HIA						Health and Care Priorities: The NEL ICS system development plan with Newham forming a partner to this – seeing where the Local Plan directly responds to the health & care plan documented in this report. At present I/we cannot see the references to the document nor a direct plan of action in the local plan as to how the planning system will assist in a healthier Newham. NEL ICB vision and priorities: https://northeastlondon.icb.nhs.uk/our-organisation/about-nhs-north-east-london/our-vision-and-priorities/ NEL ICS system development plan: https://www.northeastlondonhcp.nhs.uk/downloads/aboutus/NEL%20ICS/2110129-North-East-London-Q2-system-development-plan-vFINAL.pdf	The Local Plan addresses the topic of health and wellbeing through a 'health in all policies' approach. This means the Local Plan systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity. Policy BFN3 is an important component of this approach. Where potential health or social justice issues are likely to arise the policy requires applicants to undertake a screening assessment as early as possible in the development process, to determine whether a full Social Value and Health Impact Assessment (SV-HIA) is needed. Where a SV-HIA is needed, applicants must prepare an assessment to enable the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.
Reg18-E-149	NHS North East London	Reg18-E-149/004	Building a Fairer Newham	BFN3 Social Value and HIA						Urban planning interventions to improve the health and wellbeing of residents: We would also like to see a greater focus on the direct and measurable link between the planning system and health benefits; as an example a recent study from last summer of European cities determined that 4% of deaths over summer were caused by the Urban Heat island.	The Local Plan addresses the topic of health and wellbeing through a 'health in all policies' approach. This means the Local Plan systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity. Policy BFN3 is an important component of this approach. Where potential health or social justice issues are likely to arise the policy requires applicants to undertake a screening assessment as early as possible in the development process, to determine whether a full Social Value and Health Impact Assessment

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											(SV-HIA) is needed. Where a SV-HIA is needed, applicants must prepare an assessment to enable the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.
Reg18-E-149	NHS North East London	Reg18-E-149/005	Building a Fairer Newham	BFN3 Social Value and HIA					Urban planning interventions to improve the health and wellbeing of residents: Would be keen to explore new ways in which we can work within the new local plan to benefit local people.	Support for partnership working is welcomed. The Local Plan addresses the topic of health and wellbeing through a 'health in all policies' approach. This means the Local Plan systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity. Policy BFN3 is an important component of this approach. Where potential health or social justice issues are likely to arise the policy requires applicants to undertake a screening assessment as early as possible in the development process, to determine whether a full Social Value and Health Impact Assessment (SV-HIA) is needed. Where a SV-HIA is needed, applicants must prepare an assessment to enable the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-082	Resident	Reg18-E-082/025	Building a Fairer Newham	BFN3 Social Value and HIA					BFN 3:2	<ul style="list-style-type: none"> Page.35 (BFN3:1). Health Impact Assessments (HIA) must involve engagement of the local community. This includes identification of key health and wellbeing issues and opportunities to help influence design that support wellbeing of the community at the earliest stages. In BFN3:2, reference to "SV-HIA being done at any stage in the process of developing a planning application" should be deleted and with "SV-HIAs are most effective at the earliest stages of design and planning". 	This wording change has been made. Please see the new wording in the implementation text for Policy BFN3.2.
Reg18-T-126	Resident	Reg18-T-126/002	Building a Fairer Newham	BFN3 Social Value and HIA					[Keep it]		Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-018	Resident	Reg18-T-018/006	Building a Fairer Newham	BFN3 Social Value and HIA						[Add to it] Helping the vulnerable	The Local Plan addresses the topic of health and wellbeing through a 'health in all policies' approach. This means the Local Plan systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity. Policy BFN3 is an important component of this approach. Where potential health or social justice issues are likely to arise the policy requires applicants to undertake a screening assessment as early as possible in the development process, to determine whether a full Social Value and Health Impact Assessment (SV-HIA) is needed. Where a SV-HIA is needed, applicants must prepare an assessment to enable the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.
Reg18-T-057	Resident	Reg18-T-057/006	Building a Fairer Newham	BFN3 Social Value and HIA						[Add to it] ?	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.

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Reg18-T-082	Resident	Reg18-T-082/002	Building a Fairer Newham	BFN3 Social Value and HIA						[Add to it] I'm not sure what the policy currently entails to suggest a change	Comment noted. We are sorry that the intention of this policy was not clear. This policy approach has now changed due to the need to provide greater clarity on the approach to SV-HIA. Please see the new wording in Policy BFN3, its justification and implementation text. Policy BFN3 provides an assessment tool which can be used to better understand and maximise the potential social and health gains a development can deliver. It is also intended to help identify any mitigation needed for any potential negative impacts.
Reg18-T-086	Resident	Reg18-T-086/001	Building a Fairer Newham	BFN3 Social Value and HIA						[Keep it] x	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/005	Building a Fairer Newham	BFN3 Social Value and HIA						[Add to it] Direct impact on locals	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-105	Resident	Reg18-T-105/003	Building a Fairer Newham	BFN3 Social Value and HIA						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-S-001	Shelter	Reg18-S-001/007	Community Facilities	BFN3 Social Value and HIA						Interested in following up on the Social Value aspect of the SV-HIA – in particular how social value can consider social rent / homeless reduction / support as part of social value.	Comment noted.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/020	Building a Fairer Newham	BFN3 Social Value and HIA						Draft Policy BFN3: Social Value and Health Impact Assessment – delivering social value, health and wellbeing TTLP support the Council’s aspirations to maximise social value and deliver health and wellbeing objectives. As such the requirement to submit a Social Value and Health Impact Assessment for major development proposals where potential health or social justice issues are likely to arise is supported. However, at present the policy provides very limited guidance on what the scope / requirements are for such a report. As such, further clarification in the draft Local Plan is requested.	This policy approach has now changed due to the need to provide greater clarity on the approach to SV-HIA. Please see the new wording in Policy BFN3, its justification and implementation text.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-007	Anjumnan E Islahul Muslimeen (London) Uk Trust Ltd	Reg18-K-007/001	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			1			Developers should also pay towards the inter-linked road connections between its site , including walk/water ways	Comment noted. Obligations to provide improvements to the public realm surrounding the site are included in policy D2 and obligations to provide better connects to sites, including over and along waterways is included in policy T2.
Reg18-K-007	Anjumnan E Islahul Muslimeen (London) Uk Trust Ltd	Reg18-K-007/002	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			3			If financial viability reports are produced by Local community Trusts for a limit on development of housing on its sites then it should be taken into consideration and local communities should not be treated with the same level of expectations as mega developers.	Comment noted. The contamination costs agreed in the previous viability assessment for this site have been included in the viability assessment for the site allocation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/050	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						e. BFN4 Developer Contribution and Infrastructure Delivery - Would you keep, change or add something to this policy? No Comment	Comment noted.
Reg18-E-122	Ballymore	Reg18-E-122/006	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2			[Appendix 1] Ballymore consider that further clarity is needed to the Section 106 requirements and associated costs in the Local Plan to be able to undertake viability assessments early in the design and pre-application process.	Comment noted. As indicated in implementation text paragraph BNF4:1, policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text. A single list for all developments is therefore impossible.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-122	Ballymore	Reg18-E-122/007	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2			[Appendix 1]Furthermore, all obligations will need to pass the tests in set out in regulation 122 of the Community Infrastructure Levy Regulations and are often proposed post-submission and could require further rounds of viability testing and delaying determination. In general, Ballymore have concerns that the policy as drafted will be used to seek increased contributions for deviations from policy targets and not to secure required mitigation to make proposals acceptable, as set out in the tests in regulation 122.	Comment noted. It is not clear which obligations you consider would not be in compliance with the regulation 122 tests.
Reg18-K-053	Community Group Rep	Reg18-K-053/001	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery					BNF 4:3	Previous viability studies on S10 Core sites relating to the feasibility of housing on contaminated sites needs to be reviewed	Comment noted. The contamination costs agreed in the previous viability assessment for this site have been included in the viability assessment for the site allocation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/070	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			3.c			In reference to policy requirement BFN3.c [sic], we note that in the case of viability concerns, delivery of required infrastructure is listed as priority c, following homes (a) and jobs (b). Arguably, essential infrastructure is needed in order to be able to deliver affordable housing and employment / training opportunities, and opportunities for improvements and new infrastructure should be delivered alongside new development.	This policy approach has now changed due to provide better clarity on the approach which will be used to ensure required infrastructure will be delivered, while emphasising the Council's commitment to delivering affordable housing. Please see the new wording in implementation text BFN4.3.
Reg18-E-145	Environment Agency	Reg18-E-145/071	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery				3.12		We are pleased to see the commitment to collaborative partnership working in justification paragraph 3.12 page 38, as well as the reference to the Infrastructure Delivery Plan. Within our remit, a key concern here will be to ensure that flood risk management (flood defences) infrastructure and any needs for improvements have been identified and inform the evidence base.	Comment noted. Flood defences are included in the Infrastructure Delivery Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-106	Home Builders Federation	Reg18-E-106/006	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			5			We note that the Vacant Building Credit will be disapplied in Newham. This is not something that was supported by the examining panel when the Mayor attempted to introduce a blanket disapplication across London in the London Plan. The situation facing Newham Council is not unique. Every urban and heavily constrained local planning authority in England has the same challenges in terms of land supply, very large unmet housing needs, and affordable housing need. This is true for Brighton and Bristol neither of which disapply the Vacant Building Credit. The disapplication would disincentive housebuilders and make it harder for the borough to meet its housing requirements. We recommend that the Council reconsiders this proposal.	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is clear that this incentive is not required for development in Newham, as no site in Newham has sought to apply vacant building credit to date.
Reg18-E-105	IQL South	Reg18-E-105/008	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2			IQL South feel further clarity is needed to Part 2, to help explain that the requirements for viability assessments are considered against the expectations for planning obligations explained in the Local Plan and not site-specific Section 106 legal agreements. The policy wording is ambiguous to when a financial viability assessment would be required and whether addressing this policy should be identified at submission stage or after Section 106 discussions have commenced post-submission.	This policy approach has now changed to clarify that where a scheme is not proposing to meet all policy requirements or related obligations on viability grounds a viability assessment will be required. The Council's Planning Assessment Requirements list states that when this is the case a viability statement is requirement on application. National guidance recommends that viability is discussed as early as possible in the planning process.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/010	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						Furthermore, clear guidance will be required how to assess impacts on different types of infrastructure, such as transport, social infrastructure and open space. Without agreed methodologies for physical or financial contributions, it will be subjective whether all expected planning obligations could be met and a viability assessment would be required and the policy will not be effective.	Comment noted. As indicated in implementation text paragraph BNF4:1, policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text. Where a calculation methodology can be provided, this has now been included.
Reg18-E-105	IQL South	Reg18-E-105/012	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						Added to this, it will be important that the policy also allows for negotiation to take place on Section 106 requirements during the determination period, without the need to consistently update viability assessments	Comment noted. This will depend on the scale of any changes which occur during the determination process.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/013	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						Policy BFN4 'Developer contributions and infrastructure delivery' seeks to obtain contributions from developers to fund affordable housing, improvements to infrastructure and the environment as appropriate, to achieve sustainable development. It will be important to secure additional investment for the Regional Park via planning obligations (CIL/S106) from those developments likely to impact the Park, and which place additional pressure on its open and waterside spaces, biodiversity and heritage sites.	Comment noted. Any financial contributions would be considered at application stage and on an application specific basis and would have to demonstrate a significant impact on the Regional Park.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/062	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery					BNF 4:4	It is noted that there is reference to the future updating of the Councils' Infrastructure Delivery Plan. The LLDC Infrastructure Delivery Plan Infrastructure List is updated annually in consultation with infrastructure stakeholders, including the Council. Given the link to this and potential infrastructure funding it will be important that the relevant projects contained in the LLDC List are reflected in the updated Newham IDP.	Comment noted. We have already worked collaboratively on the production of both our Infrastructure Delivery Plans and will do so on any future updates, both while the planning function remains with the LLDC and after transition, in your remit as an infrastructure provider.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-014	Metropolitan Police Service	Reg18-E-014/002	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			1		BNF 4:1	Policy BNF4 (developer contributions and infrastructure delivery), requires developer contributions via CIL and / or section 106 is appropriate circumstances. The policy does not stipulate what contributions will be required. The supporting text to the policy states that: "The Infrastructure Delivery Plan will [be] updated in consultation with both internal and external stakeholders, such as other service areas and infrastructure providers." Paragraph BNF4:1, relating to implementation, states that "Policies which require planning obligations are included within the thematic and spatial policies."	Comment noted. As indicated in implementation text paragraph BNF4:1, policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text.
Reg18-E-014	Metropolitan Police Service	Reg18-E-014/004	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						London Legacy Development Corporation Policies LLDC's town planning powers and functions are due to be transferred to Newham, amongst other Local Authorities, in December 2024. LLDC has included a requirement for policing contributions in connection with new development that would give rise to the need for additional policing infrastructure. This is set out at paragraphs 11.61 and 11.62 of the LLDC Planning Obligations Supplementary Planning Document (Adopted October 2022). This states: "11.61. It should be noted that the Metropolitan Police Service has developed a model for defining a proportionate level of contribution towards the policing resource generated by new development and will be likely seek contributions using this model for	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										development proposals that are referable to the Mayor of London. Areas for use of contributions that have been identified include staff set up costs, vehicles, mobile IT, Police National Database (e.g. licences, IT and telephony) and the provision of police accommodation. 11.62. Applicants proposing referable schemes are encouraged to engage with the Metropolitan Police Service at the preapplication stage to help understand the amount likely to be sought through this modelling and any specific policing infrastructure that might be sought within the scheme itself."	
Reg18-E-014	Metropolitan Police Service	Reg18-E-014/005	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						The plan as currently drafted is not entirely clear as to what contributions would be sought in respect of crime and policing. The reference to this under public realm implies that the scope of contributions may not cover what MPS has suggested within its 2021 representations (attached) as being necessary to mitigate the impacts of crime from proposed development within the plan period, although this is not entirely clear. The Metropolitan Police Service is keen to ensure that the LLDC policy referred to above continues to be applied once planning powers transfer to Newham and also considers this to be an appropriate wording for inclusion in the draft Newham Local Plan. The policy also appears to be suitable to apply throughout Newham. We therefore suggest that Policy BN2 [sic] is amended to include the LLDC text above as a new subsection. This would bring the LB	A change to this policy approach has not been made. We did not consider this change to be appropriate as the inclusion of planning obligations for security and safety is already included as a planning obligation under Policy D2. These will be secured where they directly relate to the security and safety of the scheme.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Newham policies in line with a substantial number of other Local Authorities across the country, including LLDC, which already acknowledge the need for section 106 contributions to mitigate the impact of crime from new developments.	
Reg18-E-149	NHS North East London	Reg18-E-149/006	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						Planning system space & capital: As we know historically Newham has not collected s106 funds to fully support the health infrastructure required for new residents in the borough and this is creating pressures in the health system; as an example Newham A&E needs to be expanded to cope with the new population – built for 200 contacts a day, now at over 500. We would like to see much greater support from the Newham planning system in securing s106 capital funds for health to support the broad spectrum of services provided to Newham residents.	Comment noted. Where requested by the NHS, using the opportunities to meet these needs identified by the site allocation methodology work, the delivery of a health centre designed to meet NHS needs and standards is required on specific site allocations. The Plan requires the delivery of the health facilities to be subject to a needs base assessment at the time of delivery. Where no facility is coming forward on a large site, any financial contributions would be considered at application stage and on an application specific basis and the financial contribution linked to a specified health project where the health needs of that population would be met.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/016	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			4			<p>Draft Local Plan Policy BFN4 (Developer Contributions and Infrastructure Delivery) (4) requires the following: “Developments at or over 250 units/hectare density or on site allocations or of a scale referable to the Mayor of London will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development.”</p> <p>Supporting text BNF4:4 further states that where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p> <p>We do not consider the above approach to be justified. We consider the current drafting has the potential to hinder development in scenarios outside the control of the Applicant. It is for the Council to positively prepare Local Plans and ensure strategic infrastructure is planned to support the delivery of development need.</p> <p>Should additional infrastructure be required as part of a development, this should be secured within the consent via S106 and CIL contributions in accordance with Reg 122 of the CIL Regulations 2010.</p>	Comment noted. This policy wording reflects London Plan policy D2. The development scale thresholds relate to the scale of development we consider to be high density (see policy D4 in the Draft Local Plan) and the important relationship between master planning and consideration of infrastructure capacity.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/020	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			4		BNF 4.4	<p>[Appendix D] BFN4: Developer contributions and infrastructure delivery Page 37 Proposed Suggested Amendments: Developments at or over 250 units/hectare density or on site allocations or of a scale referable to the Mayor of London will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development.</p> <p>Supporting text BNF4:4 further states that where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p> <p>Reason / Comment We do not consider the above approach to be justified. We consider the current drafting has the potential to hinder development in scenarios outside the control of the Applicant. It is for the Council to positively prepare Local Plans and ensure strategic infrastructure is planned to support the delivery of development need. Should additional infrastructure be required as part of a development, this should be secured within the consent via S106 and CIL contributions in accordance with Reg 122 of the CIL Regulations 2010.</p>	This policy approach has now changed to remove reference to referable schemes. Please see the new wording in BFN4.2. The full change you have suggested has not been made as we did not consider it to be appropriate as it would reduce the Council's ability to ensure that there was sufficient infrastructure capacity to support growth, as per the requirements of London Plan policy D2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-094	Poplar HARCA	Reg18-E-094/016	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			1			Policy BFN4: Developer contributions and infrastructure delivery The Association agrees with the need for developers to deliver the necessary infrastructure to support their schemes and achieve sustainable development	Support noted.
Reg18-E-094	Poplar HARCA	Reg18-E-094/017	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			1			However, it is recommended that wherever possible, developers should be supported to deliver such infrastructure while they remain on site rather than make financial contributions. This is considered a more efficient and timely way to achieve delivery.	Comment noted. This will depend on the nature of the obligation and development but where possible, onsite delivery will be required.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-082	Resident	Reg18-E-082/026	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2.b			Page.37 (BFNA4: Developer contributions). Point 2 (b). Where it says that the financial viability assessment “may be subject to independent scrutiny at the applicant’s costs”, the word “may be” should be deleted and replaced with “ will be ”.	This wording change has been made. Please see the new wording in BFN4.2 and implementation text.
Reg18-E-002	Resident	Reg18-E-002/038	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			4			If the idea is to favour health happiness and wellbeing over money and (big) company profits, where's the sense of bringing in more people that need all the infrastructure - schools, doctors, hospitals, etc etc etc etc, and at the same time making it less and less likely that Newham will be able to have enough green spaces?.	Comment noted. Housing delivery is also required for health and happiness. Newham has a significant housing waiting list and housing is increasingly unaffordable. Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter.

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Reg18-E-006	Resident	Reg18-E-006/003	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery	N5.S A4 Lim mo		4			There would be requirements to add new schools, GP, parks, leisure club or sanctuary for having a good social life	Comment noted. Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter.
Reg18-E-008	Resident	Reg18-E-008/003	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery	N5.S A4 Lim mo		4			There would be requirements to add new schools, GP, parks, leisure club or sanctuary for having a good social life	Comment noted. Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter.

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Reg18-T-057	Resident	Reg18-T-057/007	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						[Add to it] ?	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. This part of the Plan has now been changed slightly to ensure the wording is clearer.
Reg18-T-098	Resident	Reg18-T-098/002	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. This part of the Plan has now been changed slightly to ensure the wording is clearer.

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Reg18-T-103	Resident	Reg18-T-103/006	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						[Change it] Provide clarity	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. This part of the Plan has now been changed slightly to ensure the wording is clearer.
Reg18-T-105	Resident	Reg18-T-105/004	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/012	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			3			The policy states that where financial viability concerns are substantiated then affordable and family housing would be prioritised, then local access to employment and training and finally delivery of infrastructure. Sport England is concerned that this approach could result in many housing schemes coming forward without the necessary sport infrastructure to support growth which could exacerbate any issues with deficits of sport facility provision in the area thereby potentially negatively affecting the Local Plans' aspiration of achieving a healthier Newham. Although BNF4:3 does indicate that in certain circumstances an alternative prioritisation is more appropriate, the initial approach results in needed sporting infrastructure as a low priority.	This policy approach has now changed due to provide better clarity on the approach which will be used to ensure required infrastructure will be delivered, while emphasising the Council's commitment to delivering affordable housing. Please see the new wording in implementation text BFN4.3.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/049	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2.a			Part 2 (a) requires sites that are not proposing to meet all Section 106 requirements on viability grounds to explore all available options to reduce the viability gap, this includes review mechanisms. The Berkeley Group considers that viability as a whole should be considered through the submission of an FVA with each site considered on a case by case basis and the final development viability agreed at the point in time of granting planning permission. The Berkeley Group proposed amendments to draft policy wording: 2. Where a site is not proposing to meet all Section 106 requirements on viability grounds applicants must: a. explore all available options (including review mechanisms , flexible trigger points or phased	This wording change has not been made. We did not consider this change to be appropriate as viability review mechanisms are required by national (paragraph 009 Viability PPG) and regional policy (London Plan Policy H5) to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										payment of contributions) to reduce the viability gap and secure much needed contributions; and b. submit a financial viability assessment. This assessment will be made public and may be subject to independent scrutiny at the applicant's cost.	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/050	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			3			Part 3 of Policy BFN4 states that where financial viability concerns are substantiated, it is expected that the Plan's objectives will be prioritised as follows: a) affordable and family housing b) local access to employment and training c) delivery of required infrastructure Whilst we do not have any specific comments on the proposed priority order for Plan objectives we do request that the policy provides some scope to acknowledge individual site circumstances which may impact the ability to achieve the proposed order of priority for plan objectives. In the case of the Bromley by Bow gasholder site, for example, which contains seven no. Grade II listed gasholders (the only kind in the world) the emerging proposals for the Site include the retention and reuse of these seven listed gasholders. The cost for both remediating the site and refurbishing these	This wording change has not been made. We did not consider this change to be appropriate as the retention of the gasholders and the remediation of contaminated land are not planning obligations, which relate to the nature of the proposed scheme being delivered. The retention of the gasholders and the remediation of contaminated land are costs associated with the land and would be required irrespective of the nature of the scheme being brought forward. As such, in line with paragraph 14 of the Viability PPG, such costs should be reflected in both the Benchmark Land Value and Residual Land Value. In addition, the policy and implementation text already provides sufficient flexibility for viability constraints to be considered and for site specific factors to be considered.

Comment	seven listed gasholders are significant abnormal costs that will need to be accounted for within any financial viability appraisal and whilst it is too early to understand what impact this may have given the unique circumstances of this site the retention of the listed gasholders may need to feature in the list of priorities in this instance. Similarly, the exceptional nature of all of the gasholder sites means that they would all be subject to remediation in order to bring the Site(s) forward for redevelopment which is subject to exceptional abnormal costs that need to be factored into the viability of the development and may influence the priority order set out in Policy BNF4. The Berkely Group proposed amendments to the draft policy wording: 3. Where financial viability concerns are substantiated, it is expected that the Plan's objectives will be prioritised as follows: a. affordable and family housing b. local access to employment and training c. delivery of required infrastructure <u>Unless exceptional circumstances mean that the order of priority for these objectives needs to be adjusted.</u>
Implementation	
Justification	
Clause	
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Site allocation	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/051	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			4			<p>Part 4 requires all developments at or over 250 units/hectare density or on site allocations or of a scale referable to the Mayor of London to be required to demonstrate there is sufficient infrastructure to support the proposed scale of development. Whilst it is acknowledged that sufficient infrastructure is required to support development, the scale that is referable to the Mayor (only 150 units) is low and development should not be prohibited by this low threshold. Development should be able to follow a design led approach not just be reliant on infrastructure schemes that may not be forthcoming or outside the control of the relevant applicant. The Berkely Group proposed amendments to the draft policy wording: 4. Developments at or over 250 units/hectare density or on site allocations or of a scale referable to the Mayor of London will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development.</p>	<p>This policy approach has now changed to remove reference to referable schemes. Please see the new wording in BFN4.2. The full change you have suggested has not been made as we did not consider it to be appropriate as it would reduce the Council's ability to ensure that there was sufficient infrastructure capacity to support growth, as per the requirements of London Plan policy D2.</p>

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Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/024	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			2			[Appendix A] For clarity, the policy (or supporting text) should list which "Section 106 requirements" require adherence to in order to avoid the need for viability testing so these costs can be appropriately factored into land values avoiding the need for application stage viability testing in conformity with the NPPF which seeks to avoid the need for viability where policy requirements are met in full. This is in line with Planning Practice Guidance which sets out that planning obligations should be clearly set out in plans and subject to examination. It is acknowledged that the Section 106 requirements are discussed elsewhere in the draft, however, a single list will help to avoid any ambiguity around when viability assessments are, and are not, required.	Comment noted. As indicated in implementation text paragraph BFN4:1, policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text. Obligations relate to policies and the nature of the development being applied for. A single list for all developments is therefore impossible.
Reg18-E-095	Transport for London	Reg18-E-095/012	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery			1.b and 3			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.	This policy approach has now changed due to provide better clarity on the approach which will be used to ensure required infrastructure will be delivered, while emphasising the Council's commitment to delivering affordable housing. Please see the new wording in implementation text BFN4.3.

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Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/021	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery					BFN 4:3	<p>Draft Policy BFN4: Developer Contributions and Infrastructure Delivery</p> <p>TTLP support the flexible approach to supporting infrastructure delivery. Draft Policy BFN4 Part 2 states that where not all S106 obligations can be met on viability grounds, applicant's must explore all available options (review mechanisms, flexible trigger points, payment of phased contributions) to reduce the viability gap and to be subject to a financial viability assessment. Part 3 of the policy states that where financial viability concerns are substantiated, it is expected that the Plan's objectives will be prioritised as follows:</p> <ul style="list-style-type: none"> A. Affordable and family housing B. Local access to employment and training C. Deliver of required infrastructure <p>At Limmo (N5.SA4), the requirement to improve connectivity to and from the site is likely to necessitate the delivery of a bridge from Limmo to Brunel Street Works over the railway tracks. Such infrastructure can have a significant impact on scheme viability, and TTLP are keen to work with LBN to explore alternative sources of funding to enable the delivery of the bridge. This is recognised in supporting text BFN4:3 which states that there may be exceptions where alternative prioritisation is necessary e.g. where necessary to deliver the provision of infrastructure required as part of a site allocation, 'additional sources of funding to enable the delivery of the required infrastructure</p>	Support noted.

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										may be identified by the Council'. TTLP strongly advocate such an approach.	
Reg18-T-098	Resident	Reg18-T-098/008	Design	D7 Neighbourliness						[Add to it] Areas that have been neglected and are not part of larger regeneration would benefit from having more funding directed;	Comment noted. The council collects the Community Infrastructure Levy from new developments and uses it to fund infrastructure across the borough, including in places where large regeneration projects are not planned. This includes funding the People Powered Places initiative.

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Reg18-T-103	Resident	Reg18-T-103/013	Design	D7 Neighbourliness						[Change it] There are no longer any neighbourhoods. Complete change in character and people	Comment noted.
Reg18-T-109	Resident	Reg18-T-109/027	Design	D7 Neighbourliness						[Add to it] Again Newham is overcrowded and suffering from [...] overcrowding [...]	Comment noted. The Local Plan's housing target and the high family housing requirement reflect the need to reduce overcrowding within Newham.

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Reg18-T-069	Resident	Reg18-T-069/025	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] What people are seeing on social media, what the companies who want to sell us things want us to see, buy eat. Even councils get influenced in ways that are insidious and unhealthy by big business, big pharma.	Comment noted. Your comment was provided in relation to the open space chapter, but is best addressed by the Social Value and Health Impact Assessment policy. This policy will be used to make sure that developments minimise any negative health impacts and maximise health benefits.
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/003	Building a Fairer Newham	Key diagram			1			[Key Diagram] We support the identification of the site's area as one of the "Transform Areas" on Page 21 of the draft plan, which is further explained in the Newham Characterisation Study 2022 as areas being capable to "substantially increase developments by introducing new building types with scope to creating a new street pattern/ frontage."	Support noted.

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/011	Building a Fairer Newham	Key diagram						[The map does not have street names. It is very hard to get a fix/locate what streets are affected] This also applies to the map on page 21	Comment noted. We have reviewed the design of the maps in the Plan and have included street names to aid their ease of use, wherever there is sufficient space.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/057	Building a Fairer Newham	Key diagram						Stratford Metropolitan centre and the East Village Local Centre are presented as new/amended centres in the Key Diagram and elsewhere in the Plan. This is incorrect as each have been designated in the LLDC Local Plan which is the current Local Plan for these locations, with the LLDC Local Plan providing the baseline from which any amendments would need to be made to designations.	A change to the designation boundary of Stratford Metropolitan has not been made. We did not consider this change to be necessary as the 'proposal' wording relates to changes from the existing Local Plan (2018) towards the new Local Plan. The boundary as set out seeks to: 1) to bringing together the designations now covered by the LLDC Local Plan (2015) and the Newham Local Plan (2018); 2) Include the East Bank site which is now substantially complete; and 3) clarify the spatial relationship with East Village Local Centre. Existing and not yet completed LLDC Local Plan (2020) site allocations delivering intensification of Stratford town centre as part of its growth towards an International centre scale are retained within the Reg 18 identified boundary. The methodology and reasoning for the boundary as proposed is set out in the Town Centre Network Review Methodology

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											Paper 2022, and we do not consider that the case has been made to review the assessment already made. However, the word 'proposed' has been removed from the Policies Map in relation to all established and emerging boundaries, to ensure clarity of the designation.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/036	Building a Fairer Newham	Key diagram						In relation to the key diagram on page 21, the Berkeley Group would make one specific comment with reference to their former gasworks site in East Ham, which as currently drafted is subject to the open space (MOL) designation across the entire site. This is incorrect and should exclude the area of previously developed land. The Berkeley Group proposed amendments to draft policy wording: Revision to map required to exclude the area of previously developed land within the open space (Metropolitan Open Land) designation at the former East Ham gasworks.	Comment noted. The key diagram is a high level diagram which shows, as per the key, the open space boundary, not the MOL boundary. The MOL boundaries are shown on the policies map and have been reviewed. The latest proposed boundaries are included in the policies map with further detail on the methodology used provided in the Metropolitan Open Space Boundary Review paper.

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Reg18-K-001	Abrdn	Reg18-K-001/007	Neighbourhoods	N1 Gallions Reach						We would expect this policy [BFN2] to be relevant to Neighbourhood Policy N1 (Beckton Riverside).	Comment noted.
Reg18-E-082	Resident	Reg18-E-082/016	Vision and objectives	Vision			1			Limitations are also imposed via the Characterisation Study as well as the site allocation process. Although site allocation is important there is a need for a level of flexibility to accommodate the quantum of housing required to meet pressing needs not least social housing in the borough.	Comment noted. Site allocations are where we expect most development in the borough to occur or are sites which require additional policy guidance. Housing delivery can take place on and is encouraged on other site too as long as the land isn't safeguarded for other important uses, like open space, employment or community facilities. These sites are known as 'windfall sites'.

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Reg18-E-082	Resident	Reg18-E-082/017	Vision and objectives	Vision			1			One of the most cost-effective ways to deliver social housing is to use existing underutilised council assets to maximise housing development.	Comment noted. A number of site allocations in the Plan encourage the regeneration and infill of council sites. Council assets can also come forward as windfall sites for housing delivery, as long as the land isn't safeguarded for other important uses, like open space, employment or community facilities.
Reg18-K-047	Resident	Reg18-K-047/001	Building a Fairer Newham	Vision			3			[Vision] Areas such as Beckton Riverside/Gallions Reach and other areas that are post-industrial or currently industrial or with infrastructure uses (eg sewage works) should also be designated a suitable for renewable energy generation alongside existing/other uses - and this be included as part of the vision. There are already some wind turbines along the Thames Gateway in industrial areas - these could be developed to increase the numbers of units and generation capacity - currently on-shore renewable energy generation is difficult to get approval for if it is not in the local plan.	A wording change to show support for renewable energy generation has been made. Please see the new wording in Policy CE2 Zero Carbon Development. The Council considers that the solar photovoltaic panels are the most likely renewable energy source in the borough, however it would consider other renewable energy generation proposals on a case by case basis.

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Reg18-E-070	Aston Mansfield	Reg18-E-070/006	General							<p>Savills, on behalf of Aston Mansfield, object to the plan as currently prepared.</p> <p>In summary, LBN currently:</p> <ul style="list-style-type: none"> • Has a five-year land supply of 2.69 years. • Does not have sufficient identified housing capacity. • Does not have the level of identified deliverable sites to meet future expected demand. • Has an open space deficiency across the Borough. <p>On this basis it is essential that the R18 plan is positively prepared in providing for enough housing provision and public open space over the plan period as informed by the London Plan 2021, and on a sufficient number of identified sites.</p> <p>Overall, the current R18 plan requires work to ensure it is positively prepared and meets the tests of soundness, in line with the NPPF.</p> <p>These representations have been prepared by Savills on behalf of the landowner – Aston Mansfield, in relation to the Lady Trower Playing Fields, Burges Road, East Ham (the Site) and are submitted in response to the consultation on the London Borough of Newham (LBN) Regulation 18 (R18) Draft Local Plan. The consultation opened on Monday 9th January and closes on 20th February 2023. LBN is seeking responses to the specific questions contained within the</p>	<p>A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology 2022' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land.</p>

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										<p>document.</p> <p>The current consultation comprises the following documents:</p> <ul style="list-style-type: none"> ▪ Newham Local Plan - Draft Local Plan, Regulation 18 for Consultation (December 2022) ▪ Local Plan Reg 18 Policies Map Local Plan (2022) <p>LBN has also published a considerable evidence base to support the R18 Local Plan consultation.</p> <p>This consultation follows the Issues and Options Consultation which took place between the 18 October and the 17 December 2021 and included a Call for Sites. Savills, on behalf of Aston Mansfield, object to the plan as currently prepared, which fails to provide for enough housing provision within the LBN over the plan period.</p>	
Reg18-E-070	Aston Mansfield	Reg18-E-070/130	General							<p>6. Summary</p> <p>6.1. These representations have been formulated on behalf of Aston Mansfield in relation to the Lady Trower Playing Fields, Burges Road. They are written in response to the consultation on the Newham Borough Council Regulation 18 Local Plan.</p> <p>6.2. To summarise whilst many of the policy aims are supported Savills believe the proposed local plan requires work to ensure it meets the tests of soundness, in line with the NPPF.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the</p>

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										<p>6.3. Particular concern relates to the level of housing proposed, which appears to underestimate the level of housing required as per the London Plan 2021 and emerging NPPF 2022.</p> <p>6.4. Lady Trower Playing Fields is currently allocated as MOL and SINC, however, due to the poor quality and 'wasteland' nature of the inaccessible site and given that appropriate mitigation measures can be implemented to prevent any adverse environmental impacts, the Site should be reallocated for housing to unlock its true potential and would provide significance benefits, both social and environmental.</p> <p>6.5. This is a rare opportunity for LBN to unlock a site that can make a significant contribution to the existing community and deliver enhanced quality and accessible open space. Moreover, the Site would also deliver much needed affordable housing in an area that the LBN are focusing on regeneration and renewal given the Site's proximity to the centre of East Ham, as well as delivering new homes that would reduce the borough's housing delivery deficit.</p> <p>6.6. Our client would be very keen to work with you to bring this Site forward, and to ensure that the Newham</p>	<p>current SINC and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022).</p> <p>London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments</p>

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										Local Plan meets the tests of soundness. [APPENDIX A: SITE LOCATION PLAN]	to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
Reg18-E-145	Environment Agency	Reg18-E-145/061								Implementation section BFN1.1. refers to development being required to comply with 'site specific development and design principles'. We recommend that it is clarified that this is anchored to the Local Plan's design policies, and the London Plan's design guidance (in reference implementation section D1.1.).	This policy approach has now changed due to clarify the link to the Site Allocations. Please see the new wording in BFN1.1 implementation text.

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Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/007	Building a Fairer Newham							[we nonetheless have concerns, that the draft local plan does not go nearly far enough. These relate principally to;] 3. gentrification, which the draft Plan in effect promotes (eg the “Urban Village” in Forest Gate (see P486) at the expense of our Borough’s already marginalised communities,	A change to this policy approach has been made. Please see revised wording in Neighbourhoods policy N15. Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, businesses and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also requires that all significant developments are masterplanned alongside the existing

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											community - so that the community are central to shaping the borough as it changes.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/053	Building a Fairer Newham							More detail is required on post-occupancy monitoring and delivery of quality as part of the planning process. Post occupancy surveys at various intervals are important ways of finding out whether the developments delivered are of good quality, have weathered well and have met the needs identified in the planning application process.	A change to this policy approach has not been made. We did not consider this change to be necessary as an explanation of what would be monitored and its purpose is already included in the implementation text for BFN2.5. The use and review of these surveys would be by the Policy Team.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-106	Home Builders Federation	Reg18-E-106/003	Building a Fairer Newham				1			The Council should avoid policies that only allow for new housing delivery in the ‘transform’ areas. This will be necessary to ensure that the Council can deliver its 3,800 homes over the next ten years on small sites of 0.25ha in size in less. In view of the recent government discussions relating to the new NPPF, and the need to give even greater support to the supply of small housing sites, and the ineffectiveness of the application of para. 69 of the current NPPF to date, this is an issue that might receive even greater attention in the next year ahead.	Comment noted. Policies BFN1.1 and BFN1.2, D3 and H1 supported by the neighbourhood policies and site allocations ensures that housing delivery in sustainable locations, where not required for other priority uses, including on small sites (under 0.25ha), is supported in the Plan. While large transformational change and the delivery of most homes will be in transform areas, enhance and conserve areas are also expected to deliver new homes of a design, scale and density in keeping with their character.
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/006	Building a Fairer Newham							Lee Valley Regional Park Policy The inclusion of the Regional Park boundary on the Policies Map is welcomed but this should be supported by a Lee Valley Regional Park specific policy statement in the Local Plan. With the return of planning powers back to Newham Council from the LLDC in 2024 significant areas of the Regional Park with fall within the jurisdiction of the Local Plan and require policy support in accordance with the remit of the Authority and the Park Development Framework. These areas will include the Lee Valley VeloPark and land consisting of the northern parklands, the open spaces, film studios, natural play and important heritage contained within the Three Mills Island complex. The Authority raised this matter at the issues and options stage. In response to this point the Engagement report notes that draft policy for the Three Mills neighbourhood (N7) “supports	This policy approach has now changed to make clear, in this policy, LBN support for the Lee Valley Regional Park and the associated framework. This is in line with the policy support for the Park already included in the Green and Water Space chapter. Please see the new wording in BFN1.5 and associated justification and implementation text.

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										the vision of the Lee Valley Park Development Framework Area, including the conservation and enhancement of the neighbourhood's waterway and heritage character and its heritage assets". It is important however that a Lee Valley Regional Park specific policy statement is included in the Local Plan supporting the Authority's remit, the Regional Park and referencing the Park Development Framework Area proposals as they apply to the entirety of the Park area within Newham. This would fulfil the mandatory requirements of the Park Act Section 14 (2) (a) as it relates to the riparian authorities such as Newham. This would provide context for the Regional Park's spatial designation included on the Policies Map.	
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/006	Building a Fairer Newham							BFN 1 - 4 Waltham Forest are supportive of the approach taken in the Spatial Strategy, which seeks to direct development and the benefits of sustainable growth to the identified key strategic areas in the borough along with the necessary infrastructure to support this.	Support noted.

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Reg18-E-112	Millenium Group	Reg18-E-112/042	Vision and objectives							Solely focussing regeneration and housing allocations in the town centre could create will be less spending in other areas in the borough, which could impact services and infrastructure. Allocating housing and infrastructure in other areas allows for a more sustainable distribution of growth and economy.	Comment noted. Policies BFN1.1 and BFN1.2, D3 and H1 supported by the neighbourhood policies and site allocations ensures that housing delivery in sustainable locations right the way across the borough, where not required for other priority uses, supported in the Plan.
Reg18-E-082	Resident	Reg18-E-082/022	Building a Fairer Newham			3.1				4. Newham Local Plan Policies <ul style="list-style-type: none"> Page.23 (3.1.). The Plan outlines a requirement for a significant quantum of office space, there are questions around this level of requirement and whether this takes into consideration the post-COVID work environment including home and hybrid working and demand for office space. 	Comment noted. The quantity of office space the Plan allows for was informed by the Employment Land Review which considered the changing work environment post covid. The Employment Land Review identifies that most of Newham's employment floorspace need is for industrial floorspace, which is followed through into the much large target floorspace figure for industrial space than office space.

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Reg18-E-098	Resident	Reg18-E-098/050	Building a Fairer Newham							4 Gentrification/Neighbourhoods The Joy White thesis in "Terraformed" must be addressed in the DP	Comment noted. The Joy White thesis reflects the specific impacts of gentrification in Forest Gate and the marginalisation this, and the impacts of austerity, causes for young black residents, resulting from a loss of spaces and facilities and exclusion from newer facilities. Within the constraints of what a Local Plan can influence - the Plan includes policies which will better protect existing community facilities and ensure they are designed with and to meet the needs of their users.
Reg18-T-116	Resident	Reg18-T-116/020	Building a Fairer Newham							[Please share any feedback you have with us.] It is also not very clear to me how we will reduce crime in the area. The problem was mentioned but the solutions were not very clear to me.	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2), to deliver social benefits for Newham's residents (Policies BFN3 and J4), and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses

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											we have provided to their comments on the draft Local Plan. However The Local Plan is not primarily responsible for reducing crime. The detection, prevention and investigation of criminal offences is within the remit of the Metropolitan Police Service (MPS). The council work in partnership with the MPS to review crime data and offer any support from a Council perspective, however the MPS would lead on crime reduction measures.
Reg18-E-092	Royal Docks	Reg18-E-092/004	Building a Fairer Newham						Building a Fairer Newham policies The general approach of seeking to support growth, Community Wealth Building outcomes and a network of successful places is supported.		Support noted.

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Reg18-E-092	Royal Docks	Reg18-E-092/005	Building a Fairer Newham							It will be important that this policy recognises the unique nature of the Royal Docks and Beckton OA given the large-scale development opportunities that exist. Flexibility in the policies is important to respond to the typography of places in the Royal Docks and the need for a viable and deliverable mix of different uses.	Comment noted. The policy, spatial strategy and neighbourhood policies respond to and reflect the character and needs, as established in the evidence base documents, of the Royal Docks.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/037	Building a Fairer Newham							The Berkeley Group wholly supports the approach to building a fairer Newham, in particular the need to deliver at least 47,600 homes in Newham over the period 2019/20 to 2028/29 (paragraph 3.1). The approach to achieving the level of change and development proposed is based on Good Growth principles which is fully supported.	Support noted.