

Appendix 14: Inclusive Economy Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/035	Inclusive Economy	J1 Employment and growth			Part 2		J1.2	<p>Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are that sport is within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (*Economic value of sport in England June 2013 published by Sport England) and sport and sport related activity is estimated to support over 2.3% of all jobs in England. Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is has not. Sport is often overlooked as an employer. It is Sport England's contention that the Council should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, acceptable on employment sites as sports uses do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment park e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, commercial football or a gymnastics club, than a</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI3 in the Regulation 18 Local Plan already provides a strong approach to the need to deliver new leisure facilities of the type needed in the right location. The approach delivers the recommendations in the Built Leisure Needs Assessment (2024). Applications for the provision of new leisure facilities on employment sites would assessed in accordance with Policies SI2 and SI3.</p>

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Implementation	500,000m2 B8 use. Sport England therefore recommends that the Policies that fall under Inclusive Economy make exceptions for sport facilities to be located in employment/industrial areas as these could support the wider use of such areas and contribute to the Council's ambitions for a Healthier Newham.
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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/001	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			We operate two linked manufacturing sites in the London Borough of Newham (LBN) employing approximately 800 people. The two sites are located approximately one mile apart, with the most of the journey between the two being carried out along North Woolwich Way. Tate & Lyle Sugars (TLS), like many other businesses in Newham has a viable future at its existing sites in the Royal Docks. We have no plans to move from these sites. <u>1. Thames Refinery, Factory Road, Silvertown, London E16 2EW</u> <u>2. Plaistow Wharf, Knights Road, Silvertown, London E16 2AT</u>	Comment noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/002	Inclusive Economy	J1 Employment and growth			SIL4 Thameside East			Tate & Lyle Sugars started refining sugar at Thames Refinery in Silvertown, East London, in 1878. Thames Refinery is the largest cane refinery in Europe and can produce around 8% of all European sugar demand/50% of UK sugar demand, when able to run at capacity. Thames Refinery and contiguous land owned by Tate & Lyle Sugars forms a site of nearly 50 acres in size straddling the area between Factory Road and the River Thames, as far East as the EMR Metal Recycling site. It forms the vast majority of the Thameside East SIL and shares a boundary with SA3 Connaught Riverside site allocation. We make extensive use of public transport, the road network and the River Thames to transport raw materials, finished products and staff to and from both sites.	Comment noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/003	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			Our Plaistow Wharf factory, located on Knights Road, has been in operation since 1881 when Abram Lyle established the business and produces the iconic Lyle's Golden Syrup. Since 2012 we have invested over £20 million in a new syrup production line, 9 new packing lines and other upgrades to the Plaistow Wharf factory, more than doubling the number of jobs to over 100. It is the most profitable site in our global group. It is part of the Thameside West SIL and borders the N3.SA2 Lyle Park West.	Comment noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/005	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			Both our sites are zoned as Strategic Industrial Land (SIL) in the Draft Local Plan. We support this wholeheartedly,	Support noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/006	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			however there is the potential for development (including residential) on the borders of our land. This necessitates effective planning policy and well thought out spatial development plans that are 'sound' as per the tests set out in the National Planning Policy Framework. Our views on the specifics of the sites and policies are dealt with in detail below.	Comment 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-128/007	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			In general, we believe the Draft Local Plan is “sound” and takes into account the needs of our business and employees. The Draft Local Plan presented for Regulation 18 consultation is, in general, is supportive and protective of jobs, business and industrial land uses. The plan gives clear, strong policies on the protection of SIL	Comment 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-128/012	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			Further we believe it is worth emphasising that effective spatial planning is more important than ever in the Royal Docks. Since the Newham Local Plan 2018 was published, a number of large residential developments have now, not only been built, but have high levels of occupancy in the Royal Docks. A number of organised residents' campaign groups have formed out of these new developments with complaints of one sort or another about existing local industry or potential industrial development. Some of the issues or complaints are absolutely legitimate and the direct result of bad behaviour by certain business.	Comment noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/013	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			However many of the issues are the result of a mismatch in expectations between newer residents (perhaps misled by the slick marketing of unscrupulous property developers) believing themselves to be moving an entirely new “residential” area and the reality of moving into a mixed use area in which heavy industry is an enduring and central characteristic. We mention this issue for two reasons. Firstly, while the Draft Local Plan cannot solve these issues, it definitely can prevent them becoming further exacerbated. It reiterates and underlines the importance of getting spatial planning right – especially the boundaries, borders and transitions between industrial land (especially SILs) and new residential led developments. It is absolutely critical that boundaries, borders and transitions provide comprehensive protection to industry from nuisance complaints, unreasonable restrictions on their operating and likewise that residents have pleasant, high quality homes and amenity. The buffering approach in the plan is supported, subject to some additional comments.	Support noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/014	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			Secondly, we are aware of some extreme suggestions circulating in the local area, such as a wholesale removal of the Thameside West SIL with existing land owners subject to compulsory purchase orders. While the Local Plan Team will be aware of the broader policy frameworks and context, such as the emphasis on protecting SIL in the London Plan and the economic rationale underpinning this, we wanted to put on record our unequivocal opposition to any of these extreme ideas. It is simply completely unsound from a planning perspective and myopic from an economic, jobs, investment, cultural or historical perspective to call for 140 year + old factories, that employ hundreds of people on good wages typically thousands of pounds above the Borough average, to wiped off the map.	Comment 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-128/032	Inclusive Economy	J1 Employment and growth				3.118		TLS note with interest the Co-location references within the draft plan and support the below policy statements. <i>J1: Employment and growth The policy therefore requires industrial development to take the form of intensification to deliver further industrial floorspace and not co-location with residential, unless explicitly stated as suitable for mixed use in Policy J1 (p151)</i>	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-128/033	Inclusive Economy	J2 New employment floorspace			Part 2			TLS note with interest the Co-location references within the draft plan and support the below policy statements. <i>J2: New employment floorspace 2. Co-location with residential development is only supported in the specific Local Mixed Use Areas and on Micro Business Opportunity Areas identified in Policy J1 Tables 8 and 9</i>	Support noted.

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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/034	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			<p>However, TLS believe that some additional policy guidance is necessary and would suggest the following line is added both to relevant site allocations (such as those above) [Lyle Park West and Connaught Riverside] and / or in relevant policy sections. <u>Co-location of residential and industrial will not be supported in buffer buildings providing transitions between new residential led land uses and SILs.</u> TLS is believe this is critical to credibly protecting and enhancing SIL uses in line with draft Local Plan and existing London Plan policy aims. No doubt the plan authors will be aware of some of the problems already existing within the borough, in terms of trying to fill ground floor light industrial units in recently built tall residential towers. The currently live Local Plan included significant release with the aim to re-provide a substantive quantity of employment and/or industrial floorspace in new developments through building upwards. In the case of the two aforementioned site allocations [Lyle Park West and Connaught Riverside], this is through the use of buffer buildings. This is a sensible, practicable idea which broadly supports the desirable goals of increasing housing supply, providing new modern employment floorspace and protecting remaining scarce SIL land. This sensible idea could potentially be jeopardised through unproven co-location attempts,</p>	<p>This wording has been changed which provides greater clarity on the existing policy approach. Please see the new wording in Design Policy D7 and Site Allocations N3.SA2 & N3.SA3.</p>

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Implementation	with apartments and industry in the same building. There are obvious conflicts such as many industrial businesses requiring regular HGV access and noisy loading / unloading at antisocial hours (if not 24 hours a day) and residents (not in a town centre location) will expect quiet between say 22.00 – 07.00. It is in fact likely that unsuitable industrial units will be built, with residential property developers retaining the freehold to the units and having little interest in filing them. Then lobbying over many years for changes of use class or even permitted development rights to turn industrial to residential (such as happened with office to residential).
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Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/035	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West & SIL4 Thameside East			<p>What categorically should not happen is that Newham becomes London's guinea pig for industrial/residential co-location experiments, whether in these buffer buildings or elsewhere in the borough. The idea of industrial/residential co-location, at least on a large scale, is still very much unproven. The locations selected in the draft plan are a sensible, sound selection in areas away from large industry and in some cases already having a history of traditional co-location (flats above shops) nearby. In this regard, TLS believe the following conclusion in the Employment Land Review (2022) is relevant 6.43 <i>It is critical that in the SILs and LILs redevelopment takes the form of intensification rather than co-location. For the Plan and the Borough more generally, there is a risk that short term co-location proposals would squander medium term intensification opportunities.. This is a particular risk while the GLA, via its pilot projects, looks to build an intensive industrial market in London, and where developers can demonstrate that, in current market conditions, a more intensive format is not viable. (p138)</i> TLS believe this is also relevant specifically to buffer buildings providing border transitions from residential into SIL, rather than just on pre-existing SILs and LILs.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/023	Inclusive Economy	J1 Employment and growth				3.117		Newham has conducted an updated Employment Land Review in 2020 that puts the jobs and office floorspace forecast below that of GLA [jobs forecast GLA = 10,144 and ELR 2020 = 4,811; office floor space requirement of 90,000 sqm (ELR 2020) as compared to 172,093 per GLA]. Overall, there is an oversupply of office space based on pipeline which is mostly concentrated within LLDC and Royal Docks with the rest of the borough experiencing more floorspace lost than gained. The Mayor welcomes the policy approach in the draft plan to support office development in Town Centres and specifically direct office development to Stratford Metropolitan Centre and aligns with the borough's 15-minute neighbourhood principle while keeping in line with London Plan Policy E1 C to develop Stratford with CAZtype office functions.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/024a	Inclusive Economy	J1 Employment and growth				3.118		Overall, the Employment Land Review (2022) highlights a positive need for industrial land. Newham's draft plan recognises that the pipeline of supply is not sufficient to meet this identified need. Therefore, to meet this economic demand and enable employment growth, Newham's policy approach is to prevent further release of industrial land and encourage industrial intensification. The Mayor welcomes this approach...	Support noted.

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Reg18-E-093	Greater London Authority	Reg18-E-093/024b	Inclusive Economy	J1 Employment and growth				3.118		The Mayor welcomes this approach but suggests that some of these statistics of need and supply are included within the local plan for clarity on type of industrial need and which specific neighbourhoods/site allocations are expected to deliver on this need.	This wording change has been made to make it clear which specific site allocations are identified for delivering employment floor space. Please see the new wording in Local Plan Policy J2. Local Plan Policies BFN1 and J1 also outline the spatial strategy for delivering employment floor space across the borough. However, we did not consider the change regarding the inclusion of statistics of need and supply is necessary as they are already included in Table 12 of the Local Plan.

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Reg18-E-093	Greater London Authority	Reg18-E-093/025	Inclusive Economy	J1 Employment and growth			Part 2		J1.2	The Mayor welcomes that the draft plan creates clear classification of employment areas into five categories and identifies sites/areas within those areas as well as compatible use type in each category - (1) Strategic Industrial Land, (2) Local Industrial Land that allow no residential and only office uses that are ancillary to industrial use; in (3) Local Mixed Use Areas, co-location is allowed based on the location, but the focus is on light industrial uses; (4) Micro Business Opportunity Areas will support local business and workspace with residential co-location; (5) Town Centres will support major and smaller scale office development depending on the town centre category.	Support noted.

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Reg18-E-093	Greater London Authority	Reg18-E-093/026	Inclusive Economy	J1 Employment and growth			Part 2		J1.2	The Mayor suggests a clarification in the plan as to which of these categories are equivalent to Locally Significant Industrial Sites (LSIS) in the London Plan, and specifically whether the Local Mixed Use Areas are equivalent to London Plan LSIS.	This wording change in the plan has been made. Please see the new wording in Local Plan Policy J1.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Comment noted.	[LLDC role] It also continues to develop it's Inclusive Economy programme.						J4 Delivery CWB and Inclusive Growth	Inclusive Economy	Reg18-E-052/011	London Legacy Development Corporation	Reg18-E-052

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/033	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			Policy J1 – Employment and Growth. There are two allocated employment sites within the adopted LLDC Local Plan which are treated differently in the current draft of the Newham Local Plan. SIL6 Bow Goods Yard is designated as SIL in the LLDC Local Plan but is also part of a wider site allocation which allows for consolidation and modernisation of employment and rail uses along with a potential for some release to non-SIL uses. The draft Newham Local Plan removes the site allocation, this is questioned given the strategic importance of this site in achieving the above approach and reducing the current impacts of the site and its operation on its surroundings while introducing new employment and other opportunities.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the site is designated as Strategic Industrial Location for consolidation and intensification of the existing industrial uses including the safeguarded rail head, concrete batching plant and other employment floor space, with the potential for redevelopment in form of large floorplate industrial accommodation to attract occupiers serving the CAZ to address the borough's needs on industrial floor space as identified in the Employment Land Review.

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-052/034	Inclusive Economy	J1 Employment and growth			LIL18 Cook's Road			Policy J1 – Employment and Growth. There are two allocated employment sites within the adopted LLDC Local Plan which are treated differently in the current draft of the Newham Local Plan. The second, is LIL18 Cooks Road which is a new designation that would replace the current Other Industrial Land Designation in the LLDC Local Plan. It is also more restrictive and would not reflect the extant planning permission that covers this site as its new designation would not allow the introduction of residential use which is allowed in the LLDC Local Plan and is also a significant element of the extant planning permission which it is understood is highly likely to be implemented in the near future.	This policy approach has now changed to reflect the approved scheme. Please see the new wording in Local Policy J1.

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-052/035	Inclusive Economy	J2 New employment floorspace			LIL18 Cook's Road			Policy J2, New Employment Floorspace. The approved outline scheme for Pudding Mill includes colocation of employment and residential floorspace. However, this is not allocation included within the policy as a Local Mixed Use area or a Micro BusinessOpportunity Area. The detailed comment seeks inclusion of Pudding Mill as a Local Mixed Use Area to reflect the approved scheme	This policy approach has now changed to reflect the approved scheme. Please see the new wording in Local Policy J1.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Support noted.	The overall approach within this policy is welcomed.					J1 Employment and growth	Inclusive Economy	Reg18-E-052/101	London Legacy Development Corporation	Reg18-E-052	

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/102a	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			<p>However, there are two employment sites identified that are within the LLDC area which do not reflect the approach within the LLDC Local Plan and which need reconsideration or clarification. SIL6 Bow Goods Yard, this is part of a site allocation within the LLDC Plan that allows for future consolidation and potential release of some land for non-SIL uses alongside modernisation of the industrial and rail related activities and facilities on the site with the provision of new infrastructure to allow the impact of the SIL uses on its surrounding to be reduced and otherwise mitigated. It is considered that this potential should be highlighted within the policy table and text added that indicated the potential for consolidation and modernisation of employment uses as part of a masterplanned approach to this site.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the site is designated as Strategic Industrial Location for consolidation and intensification of the existing industrial uses including the safeguarded rail head, concrete batching plant and other employment floor space, with the potential for redevelopment in form of large floorplate industrial accommodation to attract occupiers serving the CAZ to address the borough's needs on industrial floor space as identified in the Employment Land Review (2022). This approach to protecting industrial land follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough, including those sites previously within the LLDC's planning remit.</p>

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/102b	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			[SIL6 Bow Goods Yard] Activities here are also intrinsically linked to the Bow West Goods Yard site with physical/operational links across the River Lea and the need to coordinate future plans across the borough boundary should be recognised.	Comment noted. We have previously engaged in duty to cooperate discussions as outlined in the Duty to Cooperate Statement. We look forward to continue these duty to cooperate discussions in the future.

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/103	Inclusive Economy	J1 Employment and growth			LIL18 Cook's Road			The second site is the proposed new LIL18 Cooks Road. Within the LLDC Local Plan this is currently designated as a 'Other Industrial Location' within the Pudding Mill site allocation and this designation allows for the reprovision of existing employment floorspace in a consolidated form alongside residential development. There is an extant planning permission in place for development of this site in its entirety and the site has recently been cleared in preparation for commencement of that development. As described in the table LIL18 does not allow for this scenario and instead restricts uses to industrial, storage and distribution. Given the current position in terms of the precedent established by the extant permission and its imminent implementation, the LIL description should be amended to be more flexible and note the potential for the introduction of residential use here as part of an equivalent reprovision of employment floorspace.	This policy approach has now changed to reflect the approved scheme. Please see the new wording in Local Plan Policy J1.

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/104	Inclusive Economy	J2 New employment floorspace			LIL18 Cook's Road			Co-location of employment floor space with residential floor space is only supported in the specific local mixed-use areas and on micro business opportunity areas. Pudding Mill Lane is not identified as an area and therefore is at odds with the outline planning consent. Local mixed-use areas and micro business opportunity areas should be amended to include Pudding Mill Lane to reflect the extant permission and the LLDC strategy for development of this new mixed-use neighbourhood.	This policy approach has now changed to reflect the approved scheme. Please see the new wording in Local Plan Policy J1.

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/105	Inclusive Economy	J2 New employment floorspace			Part 2			[Pudding Mill not identified as a local mixed-use area or a micro-business opportunity area] This could also be addressed by an amendment to the policy for example adding a further point to J2, 2 as "2d or where proposed as part of a wider masterplanned scheme or location", which would allow co-location where schemes are of a scale that would allow proper integration of non-residential uses in schemes of a relevant scale where that location is not listed in the policy.	This policy approach has now changed to reflect the approved scheme. Please see the new wording in Local Plan Policy J1.

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-136/094	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						The Berkeley Group supports Newham's overarching approach to their economic future and recovery from the Covid 19 pandemic which is Community Wealth Building and is keen to support Newham where they can in building a fair economy which secures social, economic and environmental benefits for all.	Support noted.

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/095	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 3		J4.3	The Berkeley Group also notes that building a greener economy is a core Local Plan objective and is a key element of Newham's economic strategy meaning commercial developments must address the environmental impacts from economic growth, support new sectors for cleaner and greener industries and deliver improved design to support energy efficient workspaces across the borough. The Berkeley Group supports this objective in principle and provides more specific comments on this in the policies below.	Support noted.

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/096	Inclusive Economy	J1 Employment and growth			Part 1			In line with our comments above, Policy J1 states that developments will be expected to support diverse, inclusive and green economic growth. It should be made clearer either in the Local Plan, this policy or this particular point what is mean by 'green' as the definition is not particularly clear.	A wording change has been made for adding definition in the Glossary and Abbreviation. Please see the new wording in Glossary and Abbreviation of the Local Plan.

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/097	Inclusive Economy	J1 Employment and growth			SIL5 Beckton Riverside			<p>Table 6 sets out the priority uses for the Strategic Industrial Locations within the borough. Beckton Riverside (SIL.5) is designated as appropriate for large scale industrial with a focus on logistics and warehousing (third party logistics, last mile, quick commerce) and clean, green and low carbon industries. Within the functional requirements it states that no residential floorspace will be permitted in these designations. It should be noted that within the Beckton Riverside allocation the SIL land applies to the DLR depot area and an area utilised for warehousing by BDM Logistics currently. Whilst supportive in principle of the priority uses for this SIL, the Beckton Riverside area is proposed for transformation which will be led by residential mixed use development. This whole area will therefore be transformed into a new neighbourhood and the Berkeley Group therefore considers it appropriate for residential to be considered should the opportunity arise to intensify the SIL or find design solutions such as building over the DLR depot. It is therefore suggested that the restriction on residential floorspace in this location is removed. The Berkeley Group proposed amendments to draft policy wording:</p> <p>Functional requirements:</p> <p>i. No residential floorspace is permitted in these designations</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the site is designated as Strategic Industrial Location for optimisation and intensification of the existing industrial uses including the sewage treatment works, waste management facilities, Gemini Business Park, DLR Depot and the business parks to address the borough's needs on industrial floor space as identified in the Employment Land Review (2022) as well as serving as appropriate buffer against the adjacent Beckton Sewage Treatment Works. This approach to protecting industrial land follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough.</p>

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/098	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1			As set out above, the Berkeley Group supports the Council's Community Wealth Building objectives and the objective to create high quality economic opportunities for all. As a matter of course, the Berkeley Group's developments make a commitment to securing local employment opportunities during both the construction and end user phases.	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-136/099	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			Notwithstanding the Berkeley Group's willingness to commit to providing local employment opportunities, Part 1 (c) of Policy J4 outlines specific requirements for all major commercial developments (including mixed use) to provide a tariff-based contribution and an Employment Strategy which secures 35% construction phase and 50% end-user phase jobs for Newham residents. In the Berkeley Group's experience it would be more appropriate for such requirements to be considered on a site by site basis. This would enable site specific circumstances to be taken account of when considering the aims of creating wider employment and skills opportunities. The policy should therefore be updated to require the Employment Strategy to maximise the number of construction phase and end-user phase jobs for Newham residents. The Berkeley Group proposed amendments to draft policy wording: 1. All employment generating development (including mixed use) is expected to create high quality economic opportunities for all by: c. as a minimum, all major commercial developments (including mixed use) must help Newham residents access high quality employment in both the construction and end-user stage by providing a tariff-based contribution and an Employment Strategy which <u>maximises the employment opportunities for Newham residents</u>	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

<p>Comment Response</p>	
<p>Comment</p>	
<p>Implementation</p>	<p>secured in both the secures 35 per cent construction phase and 50 per cent end-user phase jobs for Newham residents.</p>
<p>Justification</p>	
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<p>Introduction</p>	
<p>Site allocation</p>	
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<p>Representation Reference</p>	

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-136/100	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 2			Point 2 outlines a requirement for suitable ancillary childcare facilities to be provided by commercial developments which includes mixed use development. This should only be required where there is an identified need and there are sufficient number of jobs to support such a facility. The Berkeley Group proposed amendments to draft policy wording: 2. Commercial developments on site allocations (including mixed use) must incorporate suitable ancillary childcare facilities to meet additional need, where this cannot be met by existing local facilities <u>and where there is an identified need and sufficient number of jobs to support such a facility.</u>	This wording change has not been made. We did not consider this change to be necessary as ancillary childcare facilities will be required only if such additional need cannot be met by existing local facilities as outlined in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/033	Inclusive Economy	J1 Employment and growth			LIL5 Land East of London City Airport			<p><i>J1 Employment and Growth</i></p> <p>The airport supports the continued identification of the land along the dockside as a Local Industrial Location (LIL5 Land East of London City Airport).</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/034	Inclusive Economy	J1 Employment and growth			LIL5 Land East of London City Airport			Draft Table 7 states that priority uses are 'transport, freight and distribution/logistics uses', with the design and delivery principles stating that office floorspace will only be supported where is it ancillary to the industrial floorspace in scale and function. As shown the 2020 master plan, uses along the dockside could include an aviation centre of excellence. Details of the proposed facility will be worked through with future partners and it could have a research and training use, which would support the wider airport and industry. It is therefore important that the policy does not preclude this or similar facilities, by treating it in the same way as all other employment areas. Suggested minor changes to the policy are therefore provided in the annex.	This wording change has been made. Please see the new wording in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/055	Inclusive Economy	J1 Employment and growth			LIL5 Land East of London City Airport			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> • Page/Policy: J1, Table 7, LIL5: Land East of London City Airport, P145. • Current Wording: Priority uses: Transport, freight and distribution/logistics uses. Design and Delivery Principles: ii. New Class E(g)l office floorspace will be supported only where it is ancillary to industrial floorspace in scale and function. • Commentary: Minor change to allow uses ancillary to the airport (not just industrial uses) • Suggested Change: Priority uses: Transport, freight and distribution/logistics uses. Design and Delivery Principles: ii. New Class E(g)i office floorspace will be supported only where it is ancillary to industrial floorspace (or London City Airport generally in respect of LIL5) in scale and function. 	This wording change has been made. Please see the new wording in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/004	Inclusive Economy	J1 Employment and growth			LMUA6 Ashburton Terrace			<p>Site Allocation</p> <p>The Site is allocated under J1: Employment and growth through Site reference LMUA6, Ashburton Terrace. The policy supports the provision of employment led development through light industrial, storage and distribution, small scale office, workspaces for Small and Medium Enterprises and start-ups and local supply chains requiring yard space (Class E(g)(i-iii)). It also supports the provision of colocation with residential development, subject to Policy J2. Policy J2 identifies that:</p> <p>“Co-location with residential development is only supported in the specific Local Mixed Use Areas... where:</p> <ul style="list-style-type: none"> a. The development remains employment led; and b. a suitable co-location design can be accommodated which maintains the function and viability of the priority uses on site and the amenity of the residential accommodation; and c. a suitable and robust Relocation Strategy for any existing uses that cannot be incorporated within the redevelopment is provided.” <p>Landhold supports the inclusion of the Site under this draft allocation and is particularly pleased to note that the draft allocation supports residential</p> 	Support noted.

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Implementation	development on the Site through colocation. The Site is located in a highly accessible and sustainable location, in close proximity to Plaistow Tube Station. It is also surrounded by established residential uses. As such, the site can support a substantial new mixed use development including mixed tenure housing. This can be seen through the new developments coming forward around Plaistow Tube Station and opposite the Site.
Justification	
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Site allocation	
Policy	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/005	Inclusive Economy	J1 Employment and growth			LMUA6 Ashburton Terrace			<u>Residential Use</u> The draft site allocation's reference to "support for residential development" at the Site is supported.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/006	Inclusive Economy	J1 Employment and growth			LMUA6 Ashburton Terrace			<p>However, given the objectives of the plan, particularly objective 5 (Homes for residents), and draft policy BFN1 (Spatial strategy) part 1. b which directs growth and homes to Plaistow, we strongly urge LBN to revise the wording to “Co-location with residential development is encouraged”. This would strengthen the support for residential use on the Site.</p> <p>The Site is highly accessible and is located in a character area, as defined by the Newham Characterisation Study (2022), as not being sensitive to change and able to support a moderate uplift in density in areas of fragmented character, of which the Site is within. It is also located directly opposite the Plaistow Station Strategic Site which is considered a transformation area capable of establishing a future centre around the station as set out in the Newham Characterisation Study (2022).</p> <p>Draft Policy H1 (Meeting housing needs) states that the majority of LBN’s new housing will be delivered on allocated sites and that housing delivery will be optimised on sites below 0.25ha. It is therefore clear from draft Policy H1 that it expects sites such as the Site to contribute towards the delivery of new homes to meet its housing needs. We support Policy H1 and given the expectation of the policy, as well as the Newham Characterisation Study (2022) in</p>	This wording change has not been made. We did not consider this change to be appropriate as Local Mixed Use Areas are employment-led designations requires schemes to first meet employment needs where co-location with residential use will be supported subject to the above.

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Implementation	<p>relation to Plaistow Station, we urge LBN to make it clearer that residential is encouraged in the allocation to ensure Policy H1 is deliverable and LBN is able to meet its housing needs.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/007	Inclusive Economy	J1 Employment and growth			LMUA6 Ashburton Terrace			<p><u>Employment Use</u> As noted above, the draft allocation includes a range of priority employment uses for the Site. We note these are priority uses and have been informed by the Employment Land Review (2022). Whilst these are priority uses, it should be made clear that if deviations are required due to commercial reasons, these will be supported provided there is evidence to justify a departure.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as the policy requirements in Local Plan Policy J1 indicates priority uses for employment locations but already states that the proposed use will need to be sufficiently justified by economic evidence in the submission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/008	Inclusive Economy	J1 Employment and growth			Part 2c			We also note that the supporting text to policy J1 states that Local Mixed Use Areas are employment-led designations. This applies to the draft policy allocation. We recognise the aims of the supporting text and we strongly support the flexibility afforded to establishing the optimum quantity and format of employment space required through undertaking a market engagement exercise.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/009	Inclusive Economy	J1 Employment and growth			Part 2c			<p>However, we request that it is made clear within the text that employment led does not necessarily mean that employment floorspace has to be a higher quantum than the residential floorspace. For the Site for example, it maybe that by undertaking the market engagement exercise, it is established that only a small proportion of the Site is required to be employment floorspace to meet market demand. The residual space would then be for residential use, which is likely to comprise a higher proportion of floorspace and could be construed as being residential led development. This should not be seen as a reason to refuse an application for the Site especially given the aims of the draft housing policies.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as it is already set out clearly in Local Plan Policy J1 the requirement for employment-led developments and how employment and residential uses should fit in.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/010	Inclusive Economy	J3 Protecting employment floorspace			Part 2			<p>Policy J3 (Protecting employment floorspace) restricts the net loss of employment floorspace (including yard space) unless this can be relocated and a financial contribution towards skills, training and local employment initiatives are secured. We urge LBN to reconsider the wording of this policy for Sites which are allocated within the Local Mixed Use Areas under Policy J1. The supporting text to policy J1 contradicts J3 as it states that residential uses should be fitted around the optimum quantity and format of employment floorspace which can meet market demands. This may be less than the existing floorspace. Draft policy J3 should specifically exclude sites which are allocated within the Local Mixed Use Area designations in draft Policy J1. This will ensure that Sites are optimised, reducing potential empty units and increasing much needed new homes. Such an approach would also align with the London Plan 2021.</p>	<p>This wording change has not been made. We did not consider this change to be appropriate as existing industrial capacity is protected in all designated employment locations, including Local Mixed Use Areas. This approach to protecting industrial land follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised. Flexibility in relocating existing businesses for more efficient use of land are provided in Local Plan Policy J3. However, the policy has now changed as to provide greater clarity of the approach to protect Local Mixed Use Areas in the borough. Please see the new wording in Local Plan Policy J3.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/022	Inclusive Economy	J1 Employment and growth			LMUA6 Ashburton Terrace			The opportunity for sustainable, co-residential development at the Site through draft allocation LMUA6, Ashburton Terrace is supported in principle subject to the comments set out above.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/019	Inclusive Economy	J1 Employment and growth			SIL			<p>Policy J1 (SIL) – Objection</p> <p>SHL found it difficult to understand the location and extent of the SIL sites listed in Table 6 (page 144). A clear map contained with the Local Plan Review that confirms this would be helpful.</p>	<p>This change has been made. Please see the new Map of Newham's Employment Designations in Local Plan Policy J1. The location of Strategic Industrial Locations can also be referred to the Policies Map.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/020	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West		<p>Having reviewed page 36 of Appendix E (Part 1) of LBN's Employment Land Review (2022), SHL understand that the SIL land located within the Thameside West site falls into 'Thameside West SIL 3'. Table 6 of the Local Plan Review (page 144) states that "No residential floorspace is permitted in these designations". However, as explained above, the SIL part of the Thameside West site currently benefits from an Extant Mixed-Use Permission (ref: 18/03557/OUT) which allows the following Phase 1 development to be constructed:</p> <p>"1. Detailed planning application for Phase 1 with works to include the proposed demolition of existing buildings and structures, and the erection of buildings, including tall buildings, comprising 401 residential units (Use Class C3) including 195 affordable units (46% by habitable room); 3,608 sq.m. (GEA) of flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted) and B8); 230 sq.m. (GEA) of flexible retail floorspace (Use Classes A1-A4); a new/altered access road from Dock Road/North Woolwich Road; new streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and servicing spaces; and other works incidental to the proposed development".</p> <p>The relevant prior to commencement</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate because, while we acknowledge that the site is subject to this planning permission (which can still be built out), the permission does not alter the SIL boundary. Given that the proposed replacement of employment floorspace, as permitted, is not the most preferable option for retaining SIL capacity in full, and considering that the scheme has not yet commenced, the site continues to be designated as a Strategic Industrial Location for industrial intensification. This designation aims to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p>	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>conditions for Phase 1 have been discharged² [Footnote text: Either for the whole site or partially for Phase 1 only] (or submitted for determination) by London Borough of Newham’s (LBN) Planning Team. Phase 1 of the development is due to commence in Mid-2023. Phases 2 and 3 (Buildings C, D, E & F) of the Extant Mixed-Use Permission, which are also located within SIL 3, include residential floorspace.</p> <p>SHL conclude that the reference in Table 6 to not allowing any residential floorspace in these designations could therefore unnecessarily result in ‘conflict’ when LBN determines any future RMAs for Phases 2 and 3.</p> <p>Recommendation SHL suggest that either:</p> <ul style="list-style-type: none"> • The SIL area located on the east part of the Thameside West site is removed; or • The text set out in Table 6 of the Local Plan Review (page 144) should be amended as follow: “No residential floorspace is permitted in these designations, unless otherwise agreed by the local planning authority.” <p>SHL’s preference is for the deletion of the SIL area.</p>									

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/046	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			<p>G) Representations - Employment Land Review (ELR) Figures 4.5 & 4.10 Thameside West SILs Figures 4.5 and 4.10 of the Employment Land Review (2022) highlight the extent of each and name of each of the Thameside West SILs. This is not accurate and should be amended. The 'Silvertown Landing' and 'Nuplex' boundary is drawn in the wrong position.</p> <p>Recommendation</p> <p>SHL suggest that the 'Silvertown Landing' and 'Nuplex' boundary is re-drawn to be on the east side of Bell Lane.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate because, while we acknowledge that the site is subject to this planning permission (which can still be built out), the permission does not alter the SIL boundary. Given that the proposed replacement of employment floorspace, as permitted, is not the most preferable option for retaining SIL capacity in full, and considering that the scheme has not yet commenced, the site continues to be designated as a Strategic Industrial Location for industrial intensification. This designation aims to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/047	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West		<p>6. Conclusions & 15. Thameside West SIL (Para 6.63) Paragraph 6.63 of the Employment Land Review (2022) recommends that the SIL boundary for the Thameside West site should be revised (as shown on page 36 of Appendix E (Part 1) of ELR). SHL supports the principle of this recommendation and suggests that LBN further reduces the size of the SIL area within the Silvertown Landing site.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> • LBN transfers the above recommendation into the Local Plan Review and onto its Policies Map; and • Further reduces the size of the SIL area by excluding all of the Silvertown Landing land, up to the east side of Bell Lane. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate because, while we acknowledge that the site is subject to this planning permission (which can still be built out), the permission does not alter the SIL boundary. Given that the proposed replacement of employment floorspace, as permitted, is not the most preferable option for retaining SIL capacity in full, and considering that the scheme has not yet commenced, the site continues to be designated as a Strategic Industrial Location for industrial intensification. This designation aims to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/002	Inclusive Economy	J1 Employment and growth			L1L17 Rick Roberts Way North			We are broadly supportive of the Draft Local Plan and its policy aims and we believe these recognise the potential for intensification and redevelopment of the Site. We set out our detailed responses to the Draft Local Plan below.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/005a	Inclusive Economy	J1 Employment and growth				J1.1	<p>Policy J1: Employment and Growth states that developments will be expected to support diverse, inclusive and green economic growth. It also requires developments to contribute to meeting the borough's office and industrial needs to deliver 10,000 jobs (4,800 in the office sector and 5,200 in industrial/warehousing sectors); 335,000 sqm of industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period to 2038, as evidenced by the LB Newham Employment Land Review (2022).</p> <p>LB Newham's pipeline of supply is not sufficient to meet this need, nor are the sites with industrial potential currently in planning. Therefore, to meet this economic demand and enable employment growth, supporting paragraph J1.1 states that "applicants proposing economic floorspace within developments are required to provide net increases in floorspace going forward to contribute to the identified need figures, while making the most efficient use of land."</p>	Comment noted.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/005b	Inclusive Economy	J1 Employment and growth				J1.2		In addition, supporting paragraph J1.2 outlines that "Strategic Industrial Locations are strategically important industrial locations critical to the economic function of London's economy. These will be protected and intensified in accordance with London Plan (2021) Policy E7."	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/005c	Inclusive Economy	J1 Employment and growth						In light of the magnitude of the Newham's office and industrial needs, as outlined within the draft plan, we strongly support the approach of Policy J1. We are particularly supportive of the policy's recognition of the need to deliver additional employment floorspace within developments proposing economic floorspace and protect and intensify Local Industrial Locations. This perspective reflects market conditions and the rising demands for inner city industrial floorspace as most recently highlighted within the GLA London Industrial Land Supply Study 2020 (January 2023). It also recognises Local Industrial Locations' key roles across the borough in delivering inner city economic growth.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/008	Inclusive Economy	J1 Employment and growth			LIL17 Rick Roberts Way North			<p>Site-specific designations</p> <p>The Draft Local Plan designates the Site as a Local Industrial Site, as shown below in Figure 1. [Image attached - Figure 1 – Extract from Draft Newham Local Plan Policies Map] Policy J1 prioritises the development of new employment floorspace with the following uses at the Site:</p> <p>Table 1 – Draft Newham Local Plan Table 7: Local Industrial Locations Local Industrial Locations - Designation: LIL17: Rick Roberts Way North (NEW LIL) - Priority uses: Modern industrial, warehousing and office units with dedicated yard space. Blue-chip occupiers and other industrial occupiers servicing the CAZ. - Design and Delivery Principles: No residential floorspace is permitted in these designations. New Class E(g) office floorspace will be supported only where it is ancillary to industrial floorspace in scale and function.</p> <p>We support the Draft Local Plan’s designation and protection of industrial uses at the Site through its proposed Local Industrial Location status. This protection recognises the key role the Site has in local employment provision in Stratford, and</p>	Support noted.

<p>Comment Response</p>	
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<p>Implementation</p>	<p>also the Site's potential for redevelopment and intensification of employment uses to contribute towards meeting LB Newham's policy requirements.</p>
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<p>Site allocation</p>	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/017a	Inclusive Economy	J1 Employment and growth				J1.2		We also support supporting paragraph J2.1 which requires industrial intensification to explore the scope for multi-deck development as a priority ...	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/017b	Inclusive Economy	J1 Employment and growth				J1.1		...and supporting paragraph J1.1 stating that applicants proposing economic floorspace are required to provide net increases in floorspace.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/018	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			<p>3 LAND DESIGNATIONS AND SITE ALLOCATIONS</p> <p>Employment land designations</p> <p>3.1 The draft Local Plan seeks to revise the borough's employment land designations in the Canning Town area as shown below in Figure 3: [Image attached: Figure 3 – Proposed changes to employment land designations in Canning Town]</p> <p>3.2 The revision to these employment land designations which will form part of draft Policy J1 (Strategic Employment Uses) appears to derive from a recommendation of Newham's Employment Land Review (2022) (prepared by Stantec) which considers that it would be beneficial for Local Mixed-Use Areas (LMUA) in this location to follow a north-south alignment to enable intensification in the British Gas / Cody Road Strategic Industrial Land (SIL), as well as to allow for a more effective SIL buffer between the industrial and residential land to the south. This recommendation would result in the Mayer Parry Wharf site being removed from SIL (Site Designation SIL2 Cody Dock in the adopted Newham Local Plan) and added to LMUA (Site Designation LMUA12 Bidder Street in the new draft Local Plan). This is despite the aforementioned identification in relation to London Plan Policy SI 6 that demand for data centres</p>	<p>This policy change has not been made. We did not consider this change to be appropriate as the Local Plan seeks to protect industrial capacity across the borough through policies which safeguard industrial land use and via a network of strategic and local industrial locations. This includes a requirement for industrial uses to be optimised on industrial sites and not to release land for residential co-location to protect the functionality of industrial land. This will ensure that Newham continues to deliver on its regionally significant role as a location for industrial development. The Employment Land Review recognises the role of the data and digital sector within industrial land provision which meet the requirement set out in the London Plan. Also, the data centre use is currently widely accepted as Use Class B8 which is a use class that is allowed in LMUAs, LILs and SILs as set out in Local Plan Policy J1. The proposed land swap will result in a net gain of land designated as SIL in the borough. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p>

<p>Comment Response</p>	
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<p>Implementation</p>	<p>will need to be taken into account when assessing demand for industrial land</p>
<p>Justification</p>	
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<p>Representation Reference</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/019	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			3.3 For the following reasons, and for those reasons set out in the Placemaking section of this report, we believe that the Mayer Parry Wharf site should continue to be designated as SIL. We are not persuaded that what is effectively a land swap of these two areas would enable this because: i. the site for which SIL designation is now proposed on Bidder Street is 0.17 hectares smaller than the Mayer Parry Wharf site, resulting in a net loss of SIL capacity;	This policy change has not been made. We did not consider this change to be appropriate as the site is re-designated from a SIL to LMUA to capture the opportunity to make use of a cleared site to create a buffer between the SIL and the residential development at the remainder of the site as discussed in the Employment Land Review. A net gain of 0.26 ha of SIL is resulted in the land swap to improve intensification opportunity in the SIL.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/020	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			<p>[For the following reasons, and for those reasons set out in the Placemaking section of this report, we believe that the Mayer Parry Wharf site should continue to be designated as SIL. We are not persuaded that what is effectively a land swap of these two areas would enable this because:]</p> <p>ii. the site is formed of two separate plots of land (bisected by Bidder Street) that narrow significantly to the north and which have a curved site boundary, resulting in an inefficient and constrained arrangement;</p>	<p>This policy change has not been made. We did not consider this change to be appropriate as industrial development takes many forms. We therefore do not consider that the shape of this proposed SIL extension would prevent industrial development from happening at the site. The Employment Land Review (2022) proposes the land swap indicating that the area currently designated as a LMUA and which is proposed as SIL is currently functioning more akin to a SIL with existing land uses, including a safeguarded waste site as identified in the East London Joint Waste Plan which is currently in operation. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p>

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Reg18-E-126	IXDS Ltd	Reg18-E-126/021	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			<p>[For the following reasons, and for those reasons set out in the Placemaking section of this report, we believe that the Mayer Parry Wharf site should continue to be designated as SIL. We are not persuaded that what is effectively a land swap of these two areas would enable this because:]</p> <p>iii. in the absence of suitable mitigation being deliverable, the pylon and its cables that occupy airspace above the site significantly inhibit development opportunities; and</p>	<p>This policy change has not been made. We did not consider this change to be appropriate as there are a number of sites in Newham and London where pylons present a design constraint which requires suitable mitigation and where significant redevelopment has been delivered or is occurring. For any design issue related to National Grid assets, applicants are required to consult the National Grid in pre-application stage and follow guidance produced by the National Grid as set out in Local Plan Policy W4.</p>

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Reg18-E-126	IXDS Ltd	Reg18-E-126/022	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			<p>[For the following reasons, and for those reasons set out in the Placemaking section of this report, we believe that the Mayer Parry Wharf site should continue to be designated as SIL. We are not persuaded that what is effectively a land swap of these two areas would enable this because:]</p> <p>iv. the site for which SIL designation is proposed is poorly integrated with the existing SIL that it is intended to intensify; a significant strip of soft landscaped space limits the connection between the sites in visual and functional terms.</p>	<p>This policy change has not been made. We did not consider this change to be appropriate as the Employment Land Review (2022) proposes the land swap indicating that the area currently designated as a LMUA and which is proposed as SIL is currently functioning more akin to a SIL with existing land uses, including a safeguarded waste site as identified in the East London Joint Waste Plan which is currently in operation. There is no requirement for a SIL to operate as a single site. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p> <p>Also, many of the SILs in the borough are comprised of separate sub sections. Any issues regarding layout and design of any future proposals would be resolved at the design and masterplanning stage.</p>

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Reg18-E-126	IXDS Ltd	Reg18-E-126/023	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			3.4 The SIL as it currently exists, including the Mayer Parry Wharf site, does not conflict with either of the factors identified by Stantec as a reason to amend the site designation and is therefore unjustified.	This policy change has not been made. We did not consider this change to be appropriate as while we acknowledge that a well-designed data centre could be a neighbourly use, if the site remained designated as a SIL it would allow any industrial use to come forward on this site, including non-neighbourly industrial uses. A LMUA designation hence creates a more neighbourly buffer within the site allocation and therefore makes better use of this site to create a buffer between the SIL and the residential development on the remainder of the site as discussed in the Employment Land Review. Nonetheless, the data centre use is currently widely accepted as Use Class B8 which is a use class that allowed in LMUAs, LILs and SILs as set out in Local Plan Policy J1.

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Reg18-E-126	IXDS Ltd	Reg18-E-126/024	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			3.5 We note that adopted Site Allocation S12 (Canning Town Riverside), which covers the Mayer Parry Wharf site, stipulates the need for the allocation to perform a transition between SIL to the north and residential uses to the south and we do not consider that there is a need for this aspiration to change. Development of the Mayer Parry Wharf site as a data centre would provide both intensification of the SIL and would act as a 'friendly neighbour', buffering the more polluting industrial uses to the north from the Crown Wharf site to the south. Therefore, there is no reasonable justification given for the proposed alteration to the site's designation from SIL to LMUA.	This policy change has not been made. We did not consider this change to be appropriate as while we acknowledge that a well-designed data centre could be a neighbourly use, if the site remained designated as a SIL it would allow any industrial use to come forward on this site, including non-neighbourly industrial uses. A LMUA designation hence creates a more neighbourly buffer within the site allocation and therefore makes better use of this site to create a buffer between the SIL and the residential development on the remainder of the site as discussed in the Employment Land Review. Nonetheless, the data centre use is currently widely accepted as Use Class B8 which is a use class that allowed in LMUAs, LILs and SILs as set out in Local Plan Policy J1.

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Reg18-E-126	IXDS Ltd	Reg18-E-126/025	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			3.6 Draft policy J1 (Employment and Growth) identifies digital and technology uses as being priority uses within LMUA12, whilst permitting co-location with residential uses and expecting a mix of uses within the site to be achieved on a 'local' scale. This is incompatible with the floorspace quantum necessary for data centre development and would likely make such development (and the associated significant benefits) unviable and undeliverable.	This policy change has not been made. We did not consider this change to be appropriate as it is not clear to us which part of Local Plan Policy J1 requires a mix of uses or a 'local' scale to be achieved. Co-location with residential is supported in specific LMUA identified in Table 8 of the Local Plan but this is not a requirement. LMUA should first meet employment need before introducing residential into the site as set out in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/026	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			We consider that the designation for LMUA at Bidder Street should remain as it currently exists in the adopted Local Plan thereby retaining the SIL; its 'buffer' designation and prioritising uses associated with the data economy in accordance with the Newham Sparks blueprint for Mayer Parry Wharf.	This policy change has not been made. We did not consider this change to be appropriate as while we acknowledge that a well-designed data centre could be a neighbourly use, if the site remained designated as a SIL it would allow any industrial use to come forward on this site, including non-neighbourly industrial uses. A LMUA designation hence creates a more neighbourly buffer within the site allocation and therefore makes better use of this site to create a buffer between the SIL and the residential development on the remainder of the site as discussed in the Employment Land Review. Nonetheless, the data centre use is currently widely accepted as Use Class B8 which is a use class that allowed in LMUAs, LILs and SILs as set out in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/027	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			[We consider that the designation for LMUA at Bidder Street should remain as it currently exists in the adopted Local Plan thereby retaining the SIL; its 'buffer' designation and prioritising uses associated with the data economy in accordance with the Newham Sparks blueprint for Mayer Parry Wharf.] This approach also accords with the soon to be adopted (Q1 of 2023) Royal Docks and Beckton Riverside Opportunity Area Policy Framework (OAPF) (February 2022) which continues to identify the Mayer Parry Wharf site within SIL. The proposed changes to Newham's Local Plan would clearly be in conflict with the OAPF and the London Plan (2021), if the site was redesignated as SIL.	This policy change has not been made. We did not consider this change to be appropriate as the land swap is in line with the potential interventions in Royal Dock and Beckton River OAPF as shown in Figure 4.9 of the OAPF.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/031	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			3.9 It is worth noting that the LMUA on the east side of Bidder Street which has been allocated since the current Local Plan was adopted appears to have no movement on its development. This may in part be due to the existing pylon and overhead cables which significantly constrain the development of the site. There are concerns therefore about whether development could be delivered on this land as proposed in the draft new Local Plan.	"This policy change has not been made. We did not consider this change to be appropriate as the Employment Land Review (2022) proposes the land swap indicating that the area currently designated as a LMUA and which is proposed as SIL is currently functioning more akin to a SIL with existing land uses, including a safeguarded waste site as identified in the East London Joint Waste Plan which is currently in operation. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document. Also, there are a number of sites in Newham and London where pylons present a design constraint which requires suitable mitigation and where significant redevelopment has been delivered or is occurring. For any design issue related to National Grid assets, applicants are required to consult the National Grid in pre-application stage and follow guidance produced by the National Grid as set out in Local Plan Policy W4. "

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/048	Inclusive Economy	J1 Employment and growth			SIL2 British Gas/Cody Road & LMUA12 Bidder Street			<p>Recommendations to a revision to the draft policies</p> <p>3.19 Given the above, our recommendations for changes to the draft Local Plan are as follows:</p> <p>For the reasons stated above (and below in relation to Placemaking), the SIL and LMUA boundaries at the south of the Cody Dock / British Gas SIL (SIL2) which are linked to draft Policy J1 (Employment and Growth) should remain as they currently exist to achieve the aims of intensifying development on SIL and to ensure that there is no conflict with the soon-to-be-adopted Royal Docks and Beckton Riverside OAPF, given that this document continues to allocate the Mayer Parry Wharf site within SIL (also in accordance with the London Plan).</p>	<p>This policy change has not been made. We did not consider this change to be appropriate as the Employment Land Review (2022) proposes the land swap indicating that the area currently designated as a LMUA and which is proposed as SIL is currently functioning more akin to a SIL with existing land uses, including a safeguarded waste site as identified in the East London Joint Waste Plan which is currently in operation. For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document. Also, the land swap is in line with the potential interventions in Royal Dock and Beckton Riverside OAPF as shown in Figure 4.9 of the OAPF.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Support noted.	[Keep it] Good a green economy is included as well -			Part 3			J4 Delivery CWB and Inclusive Growth	Inclusive Economy	Reg18-T-006/006	Community Group Representative	Reg18-T-006

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-006	Community Group Representative	Reg18-T-006/007	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						[Keep it] LBN need to lead by example eg commissioning LOCAL people/ agencies	This wording change has not been made as local commissioning will be delivered through the requirement for developments to demonstrate delivery of Community Wealth Building Business Pledge, as set out in Local Plan Policy J4.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Comment noted.	[Keep it] Sorry nothing else to add						J4 Delivery CWB and Inclusive Growth	Inclusive Economy	Reg18-T-026/013	Resident	Reg18-T-026

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Add to it] X						J1 Employment and growth	Inclusive Economy	Reg18-T- 057/023	Resident	Reg18-T- 057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Add to it] X						J2 New employment floorspace	Inclusive Economy	Reg18-T-057/024	Resident	Reg18-T-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Unfortunately it was not clear what change you wanted to make to this part of the Plan.		[Add to it] X					J3 Protecting employment floorspace	Inclusive Economy	Reg18-T-057/025	Resident	Reg18-T-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Add to it]						J4 Delivery CWB and Inclusive Growth	Inclusive Economy	Reg18-T-057/026	Resident	Reg18-T-057

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/028	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 4b		J4.4	[Originally in CF2 New and re-provided community facilities] attract more big companies and offer them cheaper rent so they can hire local people.	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/029	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 4b		J4.4	[Change it] Offer cheaper rent to bigger companies to attract them to come to Newham so they can hire local residents,	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/030	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1b		J4.1	[Originally in J1 Employment and growth] [Change it] [Offer cheaper rent to bigger companies to attract them to come to Newham so they can hire local residents,] offer them training,	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/031	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 4b		J4.4	[Originally in J1 Employment and growth] [Change it] offer cheaper rent to local entrepreneurs,	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/032	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1b		J4.1	[Originally in J1 Employment and growth] [Change it] more courses employment	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/006	Inclusive Economy	J2 New employment floorspace						[Add to it] Add more shops	This wording change has not been made. We did not consider this change to be necessary as the retail need in the Borough is being satisfied by the draft local plan (see the High Streets chapter) according to the Retail and Leisure Assessment. Commercial floor space demand will be carefully considered within site specific retail and leisure impact assessment submitted alongside planning applications.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/007	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1b		J4.1 [Originally in J2 New employment floorspace] [Add to it] Add more [shops and] apprenticeships in those firms		A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/008	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1b		J4.1	[Add to it] More job education facilities for apprenticeships	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-086	Resident	Reg18-T-086/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1a		J4.1	[Originally in J1 Employment and growth] [Keep it] Jobs without discrimination	This wording change has not been made. We did not consider this change to be appropriate as the aim at creating high quality economic opportunities to support community wealth building for all local residents will be achieved through a list of requirements as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-086	Resident	Reg18-T-086/004	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1a		J4.1	[Keep it] Healthy workplaces	This wording change has not been made. We did not consider this change to be necessary as the delivery of health and wellbeing in Newham is addressed through Local Plan Policy BFN3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-096	Resident	Reg18-T-096/006	Inclusive Economy	J2 New employment floorspace			Part 3b	3.122	J2.3	[Originally in J4 Delivery CWB and Inclusive Growth] [Change it] It should be easier to access	This wording change has not been made. We did not consider this change to be necessary as the Local Plan is seeking to protect employment land across the borough, to ensure easier access to jobs.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-109	Resident	Reg18-T-109/039	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						[Originally in J1 Employment and growth] [Add to it] Ensure long term residents get priority	This wording change has not been made. We did not consider this change to be appropriate as the aim at creating high quality economic opportunities to support community wealth building for all local residents will be achieved through a list of requirements as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-116	Resident	Reg18-T-116/019	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						[Please share any feedback you have with us.] It was not very clear to me how we will prevent inequality. Low income families is difficult to survive with so high costs for living and need to have discounts and priority for employment in the area for example.	This wording change has not been made. We did not consider this change to be appropriate as the aim at creating high quality economic opportunities to support community wealth building for all local residents will be achieved through a list of requirements as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-075	Developer	Reg18-E-075/011	Inclusive Economy	J3 Protecting Employment Floorspace	N4.SA1 Royal Albert North		Part 2			<p>Policy J3 Protecting Employment Floorspace The Implementation of this policy suggests Part 2 relates solely to loss of loss of employment within Strategic Industrial Locations (SIL) or Local Industrial Locations (LIL), but this is not clear from the main policy text and should be confirmed.</p>	<p>A wording change has been made for improving clarity. Please see the new wording in Local Plan Policy J3.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-075	Developer	Reg18-E-075/012	Inclusive Economy	J3 Protecting Employment Floorspace	N4.SA1 Royal Albert North		Part 4			Part 4 of this policy relates to land outside of SIL/LIL and Micro Business Opportunity Areas such as our Client's site. Part 4 outlines loss of Class E(g) Commercial, Business and Service (as well as industrial uses) will only be supported through marketing evidence (at least 12 months) to show no current of future demand and the loss of employment space does not create a deficiency within the 15 minute network. As per the comments above, we suggest the allocation is specific that there is more flexibility in the loss of office space on our Client's site due to the significant amount of vacant space within the area.	This wording change has not been made. We did not consider this change to be appropriate as existing employment capacity for both industrial and office uses is protected in all designated employment locations which follows the finding in the Employment Land Review (2022). Flexibility in relocating existing businesses for more efficient use of land are provided in Local Plan Policy J3. However, the policy has now changed as to provide greater clarity of the approach to protect Local Industrial Locations in the borough. Please see the new wording in Local Plan Policy J3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-075	Developer	Reg18-E-075/013	Inclusive Economy	J1 Employment and growth	N4.SA1 Royal Albert North		Part 2a			Policy J1 directs industrial to the SIL and LIL Our Client's site and the wider masterplan sit outside such designations but industrial development is recognised as a suitable use within the allocation. Therefore, Policy J1 should reference that industrial use is also directed to certain site allocations outside of SIL and LIL.	This wording change has been made to improve clarity. Please see new wording in Local Plan Policy J1.

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-078/010	Inclusive Economy	J1 Employment and growth			Major Centre Canning Town			<p>Draft Policy J1 (Employment and Growth) seeks to take the spatial strategy set out under Policy BFN1, one step further by explicitly directing the delivery of new employment floorspace to identified locations. We understand this has been informed by the Employment Land Review (2022) that forms part of the evidence base. Within the draft Policy, “Strategic Industrial Locations” and “Local Industrial locations” are identified as those considered suitable for industrial uses which are defined in the policy wording as those falling within Class E(g) ii-iii, B2, B8 and Sui Generis. For functional reasons, the draft policy is clear that residential floorspace is not permitted in these designations and therefore Canning Town is not one of the identified locations.</p> <p>Canning Town is identified as a “Micro Business Opportunity Area”, specifically “MBOA 1: Canning Town”, and a “Major Centre” where the development of Class E(g) will be supported as part of employment-led development. We note that Canning Town has been designated as a District Centre under Policy HS1 and as per the draft Policies Map which is consistent with the London Plan. Therefore, draft Policy J1 needs to be amended to reflect this.</p>	<p>This was an error and has now been corrected. Canning Town centre is designated as a district centre. Please see the new wording in Local Plan Policy J1. However, the Canning Town Micro Business Opportunity Area is in a different location and sits outside the district centre boundary. Please refer to the policies map for the town centre and employment designation boundaries.</p>

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-078/012a	Inclusive Economy	J1 Employment and growth			Part 3		J1.3	In addition, it is considered that part e. and Table 10 of draft Policy J1 should also recognise the role of other employment-generating town centre uses as important contributors to securing employment and growth within a District Centre. We have recommended amendments to the wording to facilitate this and with direct links to draft Policies HS1 and HS2.	Comment noted.

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-078/012b	Inclusive Economy	J1 Employment and growth			Part 3		J1.3	In accordance with part 3 of the draft policy, it then allows for the most appropriate form and scale of employment-generating floorspace to be identified at the point of development proposals coming forward, through a supporting Economic Strategy. Consistent with the NPPF and in the interests of ensuring vitality and vibrancy within town centres, this is an effective way of future-proofing Canning Town and avoiding potential saturation or a lack of take-up for any particular employment-generating use. It will instead ensure that emerging proposals are appropriately informed by up to date market testing and so can respond to identified demand.	Comment noted.

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-078/015	Inclusive Economy	J1 Employment and growth			Part 2d			<p>[Recommendations 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 J1 (Part 2. d.) – “The development of use Class E(g) (i) – (iii) will be supported within Micro Business Opportunity Areas as part of employment-led development. Uses identified in Table 9 should be prioritised in each location.” 	This wording change has been made. Please see the new wording in Local Plan Policy J1.

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-078/016	Inclusive Economy	J1 Employment and growth			Part 2e			<p>[Recommendations 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 J1 (Part 2. e.) – “The development of Class E(g)(i) Office floorspace will be protected and supported and development of employment-generating main town centre uses (as defined by the NPPF) consistent with Policies HS1 and HS2 will be supported within Town Centres, as reflected in Table 10.” 	This wording change has been made. Please see the new wording in Local Plan Policy J1.

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-078/017	Inclusive Economy	J1 Employment and growth			Town Centres			<p>[Recommendations 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 J1 (Part 2. Table 10) – Canning Town to be identified as a “District Centre”. 	This was an error and has now been corrected. Please see the new wording in Local Plan Policy J1.

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-078/018	Inclusive Economy	J1 Employment and growth			Town Centres			<p>[Recommendations 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 J1 (Part 2. Table 10) – additional bullet added in relation to Major and District Centres to state “Employment generating main town centre uses (as defined by the NPPF), the type and quantity consistent with the town centre designation set out under Policies HS1 and HS2”. 	This wording change has been made. Please see the new wording in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/001	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			<p>DRAFT LOCAL PLAN – REGULATION 18 CONSULTATION VERSION (DECEMBER 2022) REPRESENTATIONS ON BEHALF OF GLP</p> <p>We write on behalf of our client, GLP, who are bringing forward the Land at Central Thameside West and Former Allnex site (the Site) in the borough (see Appendix 1 for site location plan). As you are aware, part of the Site is the subject of a live planning application (ref 19/01776/FUL) for a logistics development comprising a 3-storey 40,473sqm (GIA) storage and distribution warehouse (Use Class B8) with associated servicing yards, parking, access, public realm and landscaping. We are in current pre-application discussions with LBN officers in relation to a proposed data centre development on the Site.</p> <p>GLP Limited is a leading global investment manager and business builder in logistics, data infrastructure, renewable energy and related technologies. GLP Europe (formerly Gazeley) has a +30 year track record of developing and managing logistics real estate across United Kingdom, one of Europe’s biggest logistics markets.</p> <p>We have reviewed the Draft Local Plan in the context of GLP’s interests and provide our recommendations to the policies to ensure that they meet the tests of</p>	Comment noted.

<p>Comment Response</p>	
<p>Comment</p>	<p>soundness in Paragraph 35 of the National Planning Policy Framework (NPPF).</p>
<p>Implementation</p>	
<p>Justification</p>	
<p>Clause</p>	
<p>Introduction</p>	
<p>Site allocation</p>	
<p>Policy</p>	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/002	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			<p>The scope of these representations will focus on the following matters:</p> <ul style="list-style-type: none"> • Welcome and support for the continued designation of the Site as Strategic Industrial Land and the ambition to intensify the Site for industrial purposes, including those that contribute to the digital economy; 	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/005	Inclusive Economy	J1 Employment and growth						<p>As will be clear from these representations, whilst we generally welcome the ambition and purpose of the draft Local Plan, there are concerns that some policies will limit the ability of the Plan as a whole to deliver on its industrial intensification and digital economy objectives. As such whilst we are supportive of much of the draft Plan, we have a number of reservations about its soundness in its current form and propose to set out a series of recommendations to assist the Council.</p> <p>These representations are made with the aim of achieving a sound Local Plan, that is consistent with other development plan policy and deliverable, building in flexibility where it is appropriate to do so.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/007	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			Welcome and support for the continued designation of the Site as Strategic Industrial Land and the ambition to intensify the Site for industrial purposes, including those that contribute to the digital economy	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/009	Inclusive Economy	J1 Employment and growth			SIL3 Thameside West			<p>Data centres support the internet economy which in 2017 contributed over 16% of UK output, 10% of employment, and 24% of total UK exports, growing faster in the UK than any other G20 economy.¹ Globally, there is extremely rapid growth expected in the amount of data generated, with an up to 60% annual growth rate predicted worldwide until 2025.² The share of data storage held within data centres is increasing worldwide, driven by an increased need for security and the growth of cloud storage requirements. By 2024, 60% of the world's data is estimated to be held in traditional data servers and cloud data centres.³</p> <p>The London market has developed as a result of accessibility to key customers and sectors such as financial services, the proximity of fibre optic cables and the presence of skilled labour and businesses. The cluster is now internationally leading, but opportunities for expansion are limited, due to lack of areas with sufficient power supply, that are located near to key business locations, and have appropriate developable space. Following the GLA's Digital Economy push Newham has prepared a report to support its own digital economy aspirations – titled "Newham Sparks" – which recognises and aims to unlock the value of data to benefit borough residents, including new jobs.</p>	Support noted.

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Implementation	<p>We support the draft Plan’s objective to protect and intensify Strategic Industrial Locations (SILs) “for a diverse range of industrial and storage, logistics and distribution and related uses” (BFN1(3a)) and the specific reference to digital/data utilities and clean/green industries for SIL.3 (Thameside West) in draft Policy J1.</p> <p>[Footnote text below] 1 techUK, 2020. The UK Data Centre Sector: The most important industry you’ve never heard of 2 IDC, 2018. Data Age 2025: The Evolution of Data to Life-Critical 3 IDC, 2021. Global DataSphere and StorageSphere Forecasts</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/011	Inclusive Economy	J1 Employment and growth			Part 2			Notwithstanding the explicit support for data centre uses on SIL land, draft Policy J1 should also refer to the now widely accepted view that data centres fall within Use Class B8.	This wording change has not been made. We did not consider this change to be appropriate as while data centres use is currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/008	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			<p>Policy J1: Employment and Growth Draft Policy J1 (Employment and Growth) outlines the borough's office and industrial need to deliver 10,000 jobs (4,800 in the office sector and 5,200 in industrial/warehousing sectors); 335,000 sqm of industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period to 2038. Bow Goods Yard is proposed to be designated as a SIL with safeguarded rail heads, large scale industrial, freight distribution and small scale light industrial uses identified as the priority uses.</p> <p>It is acknowledged that there is evidence base information which supports the strategy for there to be no further release of industrial land and industrial intensification will be encouraged. Whilst the principle of this policy is generally supported including the proposed designation of Bow Goods Yard as a SIL, it is considered that flexibility should be incorporated to this designation as demonstrated by the current adopted LLDC site allocation which seeks for some residential use to come forward on the site. Policy J1 stipulates that no residential floorspace is permitted in SIL designations. Taking into account, the borough's acute housing need, it is requested for the adopted allocation which includes residential uses to be considered in the</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the site is designated as Strategic Industrial Location for consolidation and intensification of the existing industrial uses including the safeguarded rail head, concrete batching plant and other employment floorspace, with the potential for redevelopment in form of large floorplate industrial accommodation to attract occupiers serving the CAZ to address the borough's needs on industrial floorspace as identified in the Employment Land Review (2022). This approach to protecting industrial land follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough, including those sites previously within the LLDC's planning remit.</p>

Comment Response	
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Implementation	draft Local Plan so that flexibility of uses is allowed depending on market conditions in the future. We do however acknowledge that the SIL designation is important for the site and should remain. This could be achieved through designating part of the site as a Local Mixed Use Area.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/009	Inclusive Economy	J2 New employment floorspace			SIL6 Bow Goods Yard			Policy J2: New Employment Floorspace Draft Policy J2 (New Employment Floorspace) seeks for all development proposals on Strategic Industrial Locations to intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification typology. This requirement is strongly supported as this will allow additional industrial activity to come forward at Bow Goods Yard.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/010	Inclusive Economy	J3 Protecting employment floorspace			SIL6 Bow Goods Yard			<p>Policy J3: Protecting Employment Floorspace Draft Policy J3 (Protecting Employment Floorspace) stipulates that there should be no net loss of employment floorspace (including yard space) on Strategic Industrial Location. Whilst this is supported, as outlined above, if residential use did come forward on part of the site at Bow Goods Yard, this this might result in a loss of employment floorspace in one location but then intensification of employment use in another.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the site is designated as Strategic Industrial Location for consolidation and intensification of the existing industrial uses including the safeguarded rail head, concrete batching plant and other employment floorspace, with the potential for redevelopment in form of large floorplate industrial accommodation to attract occupiers serving the CAZ to address the borough's needs on industrial floorspace as identified in the Employment Land Review (2022). This approach to protecting industrial land follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough, including those sites previously within the LLDC's planning remit.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/027	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			<p>The requirement for a financial contribution and strategy to secure employment for Newham residents should be applied flexibly to ensure that development viability is not compromised. In the context of labour shortages, it is also important that the policy does not prevent developers from securing sufficient labour during the construction and operational phases.</p>	<p>This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/001	General	J1 Employment and growth			SIL6 Bow Goods Yard			<p>We are instructed by DB Cargo (UK) Ltd, in their capacity as long lease holder and rail freight operator of the Bow East Goods Yard, to submit a response to the Draft Newham Local Plan (Regulation 18) consultation which runs until the 20 February 2023. The response is primarily with regard to ensuring that the existing and future operation of this important rail freight site is appropriately safeguarded as required by National and London Plan policy.</p> <p>Bow East Goods Yard is a Strategic Freight Site ("SFS") designated for rail freight use and utilised for the import of aggregates by rail for onward distribution by road and import of construction spoil by road for dispatch by rail. The site is managed by DB Cargo who themselves operate from part of the site with other areas tenanted to a number of operators. NR have right of access through the site to their rail assets when required for maintenance or other purposes.</p> <p>Given the strategic importance of rail freight sites such as this, it is considered important to ensure that the rail served operations supported by the Goods Yard are understood, to confirm the planning policy context and requirements there are to ensure sites such as this are safeguarded and to ensure that the emerging Local Plan appropriately identifies and safeguards Bow East Goods Yard.</p>	This wording change has been made. Please see the new wording in Local Plan Policy T1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/002	General	J1 Employment and growth			SIL6 Bow Goods Yard			<p>The full extent of the Bow East Goods Yard is identified on the attached DB Cargo Bow-Head Lease Plan (Ref 17501-S2-P4). This shows the subdivision of the Goods Yard in terms of areas DB Cargo Lease, Residual Land, access and reserved rights of way. Bow East Goods Yard is understood to have been established as an operational rail freight terminal in the late 1800's. It has historically accommodated a range of rail related uses including rail served plant and industrial processes. Part of the site was operated by Bow Midland Waste from circa 1997 until 2006, with other uses including concrete batching plants, aggregate recycling and other industrial and warehousing/distribution type uses. Following the successful bid for the Olympics, Bow East was incorporated into the Olympic Park infrastructure following a CPO. The site was initially used as a logistics centre for the construction of the Olympic site where material was moved by rail from 2008 to June 2012 with the site also accommodating two dedicated concrete batching plants.</p> <p>As part of the Olympics works, planning permission (ref: 10/90331/OUTODA) was granted by the Olympic Delivery Authority (ODA), by decision dated 18 October, 2010, for the construction of a temporary warm up track and throwing field at the site. Condition six of that permission, entitled "Bow Goods Yard Reinstatement" required</p>	Comment noted.

<p>Comment Response</p>	
<p>Comment</p>	
<p>Implementation</p>	<p>that: “The use and associated structures permitted shall be for a limited period only until 31 December 2013 on or before which the use in connection with the Olympic and Paralympic Games shall be discontinued and the land reinstated to use as an operational rail facility.” The reason given for the imposition of this condition was: “To ensure reversion to an operational rail facility in compliance with Development Plan employment policies”. Shortly after the end of the 2012 Olympic Games the running track and throwing field were cleared. The site was reinstated as a rail freight site and was then utilised for the removal of material from other parts of the Olympic Park. It was ultimately handed back by the ODA to Network Rail and DB Cargo at the end of 2013.</p>
<p>Justification</p>	
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<p>Introduction</p>	
<p>Site allocation</p>	
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<p>Representation Reference</p>	

Representation Reference	Represntor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/003	General				SIL6 Bow Goods Yard			Network Rail and DB Cargo benefit from permitted development ("PD") rights including those under Part 8 of the Town and Country Planning (General Permitted Development) (England) Order 2015. Namely: "Development by railway undertakers on their operational land, required in connection with the movement of traffic by rail". The site has continued to operate under these PD rights since 2013.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/004	General	J1 Employment and growth			SIL6 Bow Goods Yard			<p>The key activities on the site at present are characterised as open storage of materials and loading/unloading of trains and HGVs. In summary, aggregates from throughout the country are imported by rail. The material is then stored and loaded for onward distribution by HGV to construction sites within Central and East London. Aggregate is also taken to concrete plants in the area for the manufacture of concrete for local developments. Spoil from local construction sites is imported to the site by road and is then stored and loaded onto freight trains to be exported to sites around the UK.</p> <p>As the site operates under permitted development rights there are no planning controls or restrictions on the number of HGV movements, the number of rail movements, or the volume of material throughput. There are also no restrictions on the hours of operation of the Bow East Site. The hours of working can be 24 hours per day, seven days per week. Train operations and loading/unloading of trains in particular are dictated by available train paths. Loading and unloading of trains is by a 360° machine fitted with clamshell and can take anything up to 3-4 hours. Whilst the Goods Yard is of course managed to minimise potential for impacts as far as practicable, it is nonetheless an active freight site which by the nature of the</p>	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>activities would be expected to generate some level of noise and activity including HGV movements. All HGVs access the Bow East site via Marshgate Lane to / from Stratford High Street (A118).</p> <p>DB Cargo currently has access to five rail paths on a Monday to Friday basis plus two additional services on a Saturday morning. DB Cargo has advised that making full use of all existing rail paths, there is the capacity to handle 2.25 million tonnes per annum (mtpa) of material by rail at Bow East, and the site has operated at this level at its peak activity in the past. Based on the use of 18 tonne HGVs this would generate some 250,000 HGV movements per annum (2-Way). Prior to the Covid pandemic use of the existing available paths enabled the handling of some 1.9 mtpa. Based on the use of 18 tonne HGVs this level of material handling generates</p> <p>3</p> <p>in the region of 210,542 HGV movements per annum (2-Way). Activity at the site is building back up to pre-Covid levels. If demand required then additional rail paths could be secured and the site could operate more intensively. This would increase annual throughput by rail to a maximum capacity of some 2.59 mtpa. This would equate to 287,778 HGV movements generated per annum (2-Way).</p>									

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/005	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			DB Cargo could, without any need for planning permission, use Bow East more intensively than is currently the case within existing rail paths and further still if additional paths are secured. As LBN will be aware applications have historically been made to LLDC for a variety of rail related development on the site principally related to rail served concrete batching plants and an asphalt plant. These have not progressed for various reasons. It is confirmed that there remains interest in further rail related development at the Bow East Goods Yard seeking to make best of uses of the sustainability advantages which transfer of freight by rail allows for. Proposals considered for the Bow East site will continue to support and retain its use for rail freight purposes which is characterised as described and generates significant rail related activity and HGV movements. Unless or until an alternative means of access is provided by the relevant authorities it should also be assumed that Marshgate Lane will continue for the long term to be the only means of access to the freight site. This should be the context in which any site allocations for sensitive uses in proximity to the Goods Yard should be considered.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/006	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			<p>Within the LLDC Local Plan (Adopted July 2020), Bow East Goods Yard is an allocated Strategic Industrial Location ("SIL") and referenced as Employment Cluster B.1a3 at Table 3. Its <u>function</u> is defined, amongst other things as 'A Safeguarded rail head and associated bulk freight distribution use. B2, B8 and waste management uses are appropriate'.</p> <p>LLDC Local Plan Policy B1, Location and maintenance of employment uses, states that 'the employment function for each cluster.... shall be protected and developed' through a list of specified provisions. Critically this includes, at part (3), the requirement that 'In accordance with the Agent of Change principle, development proposals within or adjacent to SILs should not compromise the function, integrity, access, delivery arrangements or effectiveness of the location in accommodating industrial type activities (including Use Classes B2 and B8) and their ability to operate on a 24-hour basis. For Clarity, and to avoid any misunderstanding, this applies to all clusters identified within Table 3. Mitigation measures should ensure that Classes B2/B8 operations will not have undue restriction on noise generation or delivery hours'.</p> <p>In addition to the current adopted Local Plan requirements the need to safeguard</p>	Comment noted.

<p>Comment Response</p>	
<p>Comment</p>	<p>and protect SIL and rail freight sites is clear at every level of policy.</p>
<p>Implementation</p>	
<p>Justification</p>	
<p>Clause</p>	
<p>Introduction</p>	
<p>Site allocation</p>	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/007	General	J1 Employment and growth			SIL6 Bow Goods Yard			<p>The NPPF expressly requires at paragraph 210 (e) that planning policies should: “safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material” (our underlining)</p> <p>The NPPF in the context of the ‘Agent of Change’ principle is clear in its requirements that:</p> <p>“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</p> <p>A revised version of the NPPF was published in December 2022 for consultation until 2 March 2023. It is noted that the sections set out above are not proposed to be amended under the</p>	Comment noted.

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Implementation	changes being consulted upon, albeit the paragraph numbers will change.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/008	General	J1 Employment and growth			SIL6 Bow Goods Yard			<p>London Plan (March 2021) The London Plan, adopted in March 2021, places a strong emphasis on and expressly requires the safeguarding of railheads and associated infrastructure. Policy E4, Land for Industrial, Logistics and Services to Support London's Economic Function, at Part A confirms that a sufficient supply of land and premises to meet London's current and future demands for industrial and related functions should be maintained taking into account strategic and local employment land reviews, industrial land audits and potential for intensification, co-location and substitution. The policy confirms that this should make provision for a variety of operational requirements which includes: <u>'secondary materials, waste management and aggregates'</u> and providing <u>'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure'</u>.</p> <p>Part D of Policy E4 confirms, amongst other things, that the retention, enhancement and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail.</p> <p>Policy SI 10, Aggregates, at Part B (2), makes the requirement in the context of plan making that development plans should:</p>	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>‘ensure sufficient capacity of aggregates wharves and <u>aggregate rail depots</u> is available to ensure a steady and adequate supply of imported and marine aggregate to London and maximise the movement of aggregates by sustainable modes.’ (our underlining)</p> <p>The policy goes on to confirm at Part C (2) that Development Plans should: <u>‘identify and safeguard sites and facilities, including wharves and railheads,</u> with existing, planned or potential capacity for transportation, distribution, processing and /or production of primary and/or secondary/recycled aggregates.’ (Our underlining).</p> <p>The Policy also requires at Part E that: ‘Development proposals should be designed to avoid and mitigate potential conflicts with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the Agent of Change principle.’</p> <p>Supporting paragraph 9.10.5 reiterates that boroughs should identify and safeguard existing, planned and potential sites for aggregate extraction, transportation, processing and manufacture and recognise where there may be benefits in their co-location. The paragraph goes on to acknowledges the importance of railway depots for importing crushed rock from other parts of the UK. It concludes that railheads are vital to the</p>									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>sustainable movement of aggregates and boroughs should safeguard them in line with Policy T7 Deliveries, servicing and construction. Boroughs should also safeguard sites for the production and distribution of aggregate products. Policy T7, Deliveries, Servicing and Construction, requires at Part A that: 'Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road'.</p> <p>It goes on to confirm at Part D that: '<u>Development plans should safeguard railheads</u> unless it can be demonstrated that the railhead is no longer viable or capable of being made viable for rail-based freight handling.' (Our underlining)</p> <p>Policy D13, Agent of Change, confirms at Part A that: 'The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance generating uses in a sensitive manner when new development is proposed nearby.'</p> <p>Part B expressly requires that: 'Development should be designed to</p>									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.'</p> <p>Part D details how development proposals should manage noise and other potential nuisances which includes: exploring mitigation measures early in the design process and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.</p> <p>Strategic freight sites such as Bow East are key to supporting the transfer of as much freight as possible from road to rail. Whilst they share many of the same characteristics as SIL they have individual and particular characteristics which is why they are required to be safeguarded for those particular functions.</p>									

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/010	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			<p>[In terms of how the Bow East Goods Yard site is identified and referenced in the the Emerging Newham Local Plan (Reg 18) Consultation this is as follows:</p> <p>(i) Policies Map The Draft Policies Map identifies the Bow East Goods Yard as follows:</p> <ul style="list-style-type: none"> • Waste site identified in the Evidence Base for the East London Joint Waste Plan [W1]] • Strategic Industrial Location – Bow Goods Yard [J1] <p>[Both the ‘waste’ and ‘SIL’ allocations are fully supported.]</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/014	Inclusive Economy	J1 Employment and growth			SIL6 Bow Goods Yard			Draft Policy J1: Employment and Growth – plans for new employment floorspace via a spatial strategy which amongst other things directs E(g) ii, B2, B8 and suis generis uses to SIL and LIL. Uses as identified at Table 6 are required to be prioritised in each location. The relevant extract for Bow Goods Yard is reproduced at Figure 1 [extract from Extract from Policy J1: Employment and Growth, Table 6: Strategic Industrial Locations]. Whilst the reference to the ‘safeguarded rail head’ is helpful and supported, as are the other uses identified as to be prioritised, this is not a specific policy safeguarding of the site as a rail freight site.	This wording change has been made. Please see the new wording in Local Plan Policy T1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/018	Inclusive Economy	J2 New employment floorspace			Part 2			Part 2 of the draft policy only supports co-location between industrial and residential development in the specific Local Mixed Use Areas and on Micro Business Opportunity Areas identified in Policy J1 Tables 8 and 9. However, this doesn't seem to include N3.SA3 Connaught Riverside or N3.SA2 Lyle Park West – both of which are strategic sites which require co-location to support the relevant site allocation requirements. As such, it is considered that the draft policy wording to be amended to support co-location within ' <i>Local Mixed Use Areas, on Micro Business Opportunity Areas and within relevant Strategic Sites</i> '.	The wording change has been made. Please see the new wording in Local Plan Policy J2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/019	Inclusive Economy	J3 Protecting employment floorspace			Part 2		<p>Policy J3: Protecting employment floorspace</p> <p>Part 2 of draft Policy J3 notes that in limited circumstances where a loss of employment floorspace is supported, developments are required to: (a) relocate any existing businesses to suitable alternative employment premises or sites; and (b) provide financial contributions towards skills, training and local employment initiatives and secured via a development's legal agreement. Ballymore agrees that developers should be required to offer support and assistance to any existing business which needs to be relocated as a result of redevelopment of a site, however, the obligation must only be to offer support and the developer should not be penalised if the existing business chooses to relocate without utilising the support offered.</p>	<p>A change to this policy approach has not been made. We did not consider the change to be appropriate as the financial contribution requirement is to protect the existing employment capacity in the Strategic Industrial Locations and Local Industrial Locations which are important resources of industrial land in our borough while relocation requirement is to protect existing businesses at the site. Both requirements are needed to protect the economic function of the borough. However, the policy has now changed to improve clarity on what applicants should do to demonstrate reasonable endeavours to relocate existing businesses. Please see the new wording in Local Plan Policy J3.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/020	Inclusive Economy	J3 Protecting employment floorspace			Part 2			It is important that the implementation of schemes, following the grant of planning permission, comprising economic development are not unreasonably delayed. Any obligation to assist with relocation should therefore be on the basis of a 'reasonable endeavours' clause and this should be made clear within the policy wording or supporting text.	This policy wording has not been changed. We did not consider this change to be necessary as it is clear in Policy J3 of the Local Plan that the Relocation Strategy should demonstrate reasonable endeavours to relocate existing businesses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/021	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			Ballymore supports the Council's ambition to assist with local employment through the construction phase of developments, [...]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/022a	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			[...]however, Part 1(c) of the draft policy requires 35% of construction phase and 50% of end-user phase jobs for Newham residents, based on a tariff based financial contribution of £3,867 per job. It is not clear whether this obligation has been viability tested, but it could lead to a significant financial contribution, particularly for the Council's Strategic Sites, which may have an impact on the deliverability and viability of a scheme. It should therefore be clear that this contribution is viability tested at the plan-making stage, but also that the policy wording allows for the financial contribution to be viability tested at application stage too. [...]	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/022b	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			<p>[...] Further, it's not clear if the financial contribution could be reduced through on-site provision, particularly through the construction phase. Ballymore are experienced at securing local employment and apprenticeships for construction across London, and we strongly feel on-site provision should be preferred over a financial contribution. Any policy requirement for local labour should therefore seek to secure local jobs <u>or</u> a financial contribution to be paid to the Council as a 'fall back' position.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as both a tariff-based contribution and an employment strategy to secure local high quality economic opportunities are required for all major developments as stated in Local Plan Policy J4. These obligations work together by ensuring there is a well-supported process to identify, train and support suitable local candidates for the roles prioritised for local residents.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/023	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part1c			Finally, we consider 35% of construction phase jobs and 50% end-user phase jobs to be secured through local employment to be an excessive requirement and a lower proportion would be more appropriate. For reference, LB Tower Hamlets requires 20% of the total jobs created by the construction and end-user phases of new developments for local residents and LB Hackney require 25% local labour. The proposed requirement of 35% and 50% for the construction and end-user phases, respectively, is therefore considered to be onerous and should be reduced to a more reasonable requirement, more in line with other London Boroughs.	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/020	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part1c			<p><u>Inclusive Economy</u> L&Q has strong track record providing construction and apprenticeship jobs on its in-house construction sites. Considering this experience, we are concerned that the level of jobs for Newham residents set out in Policy J4 is not realistic. We believe 20% jobs for Newham residents throughout the construction stage is a more appropriate target.</p>	<p>This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/025	Inclusive Economy	J1 Employment and growth			Part 2			<p>Policy J1 sets out the sites within the Borough that are protected for employment uses. Table 6, 7, 8 and 9 identify the sites within Newham that are designated for employment uses or mixed-use development.</p> <p>In the adopted Local Plan, the Beckton superstore and the wider Claps Gate Lane area was designated as an Employment Hub. The Draft Policies Map now shows the site as 'white land', which ignores the site's importance as a major employment location, the future potential of the site and the needs of businesses located there to be able to invest and diversify their operations.</p> <p>There is no reason given for changing this designation. The area was designated in the adopted Plan in 2018 and there has been no material change in circumstances in the interim.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/026	Inclusive Economy	J1 Employment and growth			Part 2			<p>Sainsbury's are a large employer in the Borough and the Beckton site is an appropriate place for development. The land occupied by the superstore and the other developments off Claps Gate Lane should benefit from an employment or mixed-use designation. Although the land is characterised by retail uses, the area employs a large number of people, most of whom will be local residents. Retaining the employment designation would support employment generating uses in the future and encourage businesses to invest and create jobs. Without a supportive allocation, employers may be unwilling to extend or expand.</p> <p>Therefore, we strongly encourage the Council to retain the broad employment designation of Claps Gate Land and the wider area to the southeast of the A13 which is shown in the adopted Plan in the next iteration of the Local Plan.</p>	<p>A change to this policy approach has not been made. We did not consider this approach to be appropriate as we have chosen not to retain employment hubs as a designation in this Local Plan as they are considered to be too broad and encompass too many potential uses to provide a clear spatial steer. The Plan instead uses employment and town centre designations and site allocations to steer economic development to appropriate locations. In this location, industrial intensification in out of centre retail parks is supported as outlined in the Spatial Strategy, Inclusive Economy and Neighbourhood policies. This supports the Local Plan's identified need for further industrial land and town centre first approach, supported by the Employment Land Review and Retail and Leisure Study.</p>

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-111/066	Inclusive Economy	J1 Employment and growth			Part 2f			[Appendix A] Part 2: TSP support the inclusion of Part 2f, as the mixed use and employment-led site allocations are an important contributor to employment generation.	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-111/067	Inclusive Economy	J1 Employment and growth			Part 3			[Appendix A] Part 3: TSP have concerns in relation to the requirement for all employment floorspace proposals to submit an Economic Strategy, including those in areas in locations identified as suitable for employment floorspace. This will create barriers to sustainable economic growth, limiting potential for businesses to naturally grow and expand, which is likely to impact smaller start-up businesses in particular and restrict investment in the Borough.	This policy approach has now changed due to reducing the scope for Economic Strategy requirement from all developments to only major developments incorporating employment floorspace. Please see the new wording in Local Plan Policy J1.

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-111/068	Inclusive Economy	J2 New employment floorspace			Part 3b		J2.3	[Appendix A] Part 4: TSP welcome the recognition that employment floorspace is an important factor in delivering the 15-minute neighbourhood.	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-111/069	Inclusive Economy	J2 New employment floorspace			Part 4		J2.4	[Appendix A] However, the requirement at Part 4 for all new standalone office space (E(g)(i)) outside Town Centres and Micro Business Opportunity Areas to be subject to a sequential test and impact assessment, including proposals on site allocations, does not support this commitment. Unlike a Retail Impact Assessment, there is no standard methodology by which to assess the quantitative impact of offices and no clear guidance as to what impacts should be assessed. This policy places an onerous requirement on businesses and would restrict opportunities for viable office uses to come forwards, even on allocated sites. The policy goes beyond the approach in the NPPF, which does not require an impact assessment for office uses, and only applies a sequential test on Town Centre uses “which are neither in an existing centre nor in accordance with an up-to-date plan” (NPPF, paragraph 87). The policy sets no threshold for the impact assessment. Placing this level of restriction on any office development, even on allocated sites, will create uncertainty and may lead to a reduction in investment within the Borough.	A change to this policy approach has not been made. We did not consider this change to be appropriate as offices are primarily directed to the town centres and then the edge-of-centre Micro Business Opportunities Areas according to Local Plan Policy J1. With oversupply of office floorspace in the borough as demonstrated in the Employment Land Review and the town centre first approach, employment uses outside the town centres and MBOAs are subject to requirements as set out in Local Plan Policy J2 including the sequential test and impact assessment to ensure the vitality and viability of town centres. This approach is supported by the GLA as it is in conformity with the London Plan, and in particular the role of Stratford as overflow CAZ.

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-111/070	Inclusive Economy	J3 Protecting employment floorspace			Part 4		J3.4	[Appendix A] Silvertown includes existing industrial uses at Charles Street that are not considered to be relocatable on site. The stated requirement to support relocation of existing businesses should be refined to only apply in circumstances where the existing business is a small or medium sized business, where their relocation away from the site is as a direct consequence of the development proposal rather than their lease expiring, and where they are actively seeking relocation.	A change to this policy approach has not been made. We did not consider the change to be appropriate as relocation requirement is to protect existing businesses at the site, and the economic function of the borough. However, the policy has now changed to improve clarity on what applicants should do to demonstrate reasonable endeavours to relocate existing businesses. Please see the new wording in Local Plan Policy J3.

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-111/071	Inclusive Economy	J3 Protecting employment floorspace			Part 4		J3.4	[Appendix A] Specifically in relation to Part 4, the proposed requirements should be clarified to not relate to site allocations, as the requirement to obtain marketing evidence and carry out 15-minute mapping could delay the delivery of strategically important regeneration.	This wording change has been made. Please see the new wording in Local Plan Policies J3. Developments on site allocation should follow the development principles as set out in relevant site allocations in the Local Plan.

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-111/072	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c		J4.1	[Appendix A] Part 1: the viability and deliverability impact of the proposed employment obligations, including contributions, requires a thorough assessment to ensure the approach will not negatively impact on the delivery of affordable housing over the plan period.	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

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-111/073	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 4		J4.4	<p>[Appendix A] Part 4:, there needs to be consideration of viability impact of potential Affordable Workspace requirements.</p> <p>This is especially important for strategic sites allocated for mixed-use development in regeneration areas such as Silvertown. The appropriateness of the principle seeking affordable workspace in such locations, where workspace would be inherently affordable in a London context and its success would foster community wealth building, is questioned and should be considered.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as site allocations delivering employment uses, as set out in the relevant site allocation's development principles, are not required to provide affordable workspace.</p>

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-134/012	Inclusive Economy							<p>J1 - J4</p> <p>Waltham Forest are supportive of the policy proposals for “good” and inclusive economic growth that are proposed in the Draft Local Plan. Again, we are pleased to see that employment land is recognised as an important contributor to 15-minute neighbourhoods, and a drive to secure affordable employment space -which will encourage local, “homegrown” businesses to continue to be located in the borough. Waltham Forest is also supportive of incentivising a greener economy and the greater, informed use of data and digital technology. We are also supportive of the policy approach that seeks to protect employment land, especially the recognition of the strategic importance of Strategic Industrial Locations.</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/006	Inclusive Economy							<p>Economic growth. The significant jobs growth in Newham expected over the Plan period is supported but would like to discuss how this can benefit Redbridge residents and any impact on employment opportunities in Redbridge. The overall policy stance and spatial strategy is very robust and detailed, based on a strong key evidence base, and we would welcome further discussion on how employment opportunities can be widened. We previously supported proposals for “green zones” and would like to know if this is still being taken forward.</p>	<p>Support noted. Formal duty to cooperate discussions will be organised around our regulation 19 consultation to resolve cross-borough issues.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-148	City of London	Reg18-E-148/037	Inclusive Economy							Whilst it should be made clear that City of London is currently exploring potential development options for the Site and as such we do not wish to offer any detailed comments, it should be noted that the City of London is broadly supportive of the Council's approach to the delivery of new homes and employment floorspace as set out within Draft Policies H1-H11 and Draft Policies J1-J4 respectively.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/005	Inclusive Economy	J1 Employment and growth						It is also essential that the Local Plan specifically sets out that these are safeguarded via 2021 Secretary of State Ministerial Direction and supported by policy SI15 (Water Transport) of the Mayors London Plan (2021). Within the Local Plan it is recommended that this wording is included in policy J1 (Employment and Growth) and/or policy T1 (Strategic Transport) to highlight their safeguarded status	This wording change has been made. Please refer to the revised wording in Local Plan Policy T1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/014	Inclusive Economy	J1 Employment and growth			SIL			Support the reference to the boroughs three safeguarded wharves within this policy which are all included within the boroughs Strategic Industrial Land (SIL) designations, and are specifically highlighted in table 6 (SIL) for the relevant areas at SIL.3 Thameside West (Peruvian and Royal Primrose) and SIL.4 Thameside East (Thames Refinery).	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/015	Inclusive Economy	J1 Employment and growth			Part 2			As noted above further detail should be included in the supporting text to the fact that these wharves are safeguarded via 2021 Ministerial Direction.	This wording change has been made. Please refer to the revised wording in Local Plan Policy T1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/016	Inclusive Economy	J1 Employment and growth				3.118		Support the statement in section 3.118 that there should be no further release of industrial land within the borough, rather that industrial intensification will be encouraged and supported to deliver further industrial floorspace.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/016	Inclusive Economy	J1 Employment and growth			Part 2e			IQL South is a major employment area within the borough, with three Grade 1 office buildings occupied, a further in construction and three more approved in outline to be detailed in future reserved matters applications.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/017	Inclusive Economy	J1 Employment and growth			Part 2e			Accordingly, IQL South supports the policy direction to focus major office (Class E(g)(i)) development in Stratford Metropolitan Centre. This will help strengthen Stratford as strategic office hub in London.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/018	Inclusive Economy	J1 Employment and growth	Stratford Metropolitan Centre		Part 2e			To help grow and support Stratford as a commercial hub and to deliver more jobs in the area, IQL South also recommends that the range of acceptable commercial uses in the Metropolitan Centre is extended to include Class E(g)(ii) Research and development of products or processes. Class E(g)(ii) is provided alongside office buildings in other similar strategic office locations across London, with the nature of the use compatible within shared office buildings or office hubs.	A change to this policy approach has been made. Please see new wording in Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/104	Inclusive Economy	J1 Employment and growth				Table 11		Hadley notes that a minimum of 90,000sqm of office floorspace is required across the borough to meet demand. Hadley requests further clarification on the evidence base for this requirement and whether the extant LLDC permission for Hadley's sites form part of the evidence base.	This wording change has not been made. We did not consider this change to be necessary as evidence on the demand on office floorspace is provided in the Employment Land Review with permitted office floorspace counted in the pipeline supply.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/105	Inclusive Economy	J1 Employment and growth			Part 2e			Hadley is encouraged by paragraph J1.2(e) which supports the development of office floorspace in Town Centres, and the priority use of major office floorspace and low cost, creative and cultural workspaces in Stratford Metropolitan Centre.	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-130/106	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			Hadley is supportive of the ambition to provide employment for local residents and seeks to employ local talent where possible. However, Policy J4 requires a financial contribution for 35% construction phase and 50% end user phase at £3,867 per resident which is a significant cost for new developments.	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/107	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			The policy should clarify whether this is required if a developer provides on-site employment for local workers, which often forms part of their Corporate Social Responsibility strategies secured through a S106 Agreement and the provision of an Employment and Training Strategy	A change to this policy approach has not been made. We did not consider this change to be necessary as both a tariff-based contribution and an employment strategy to secure local high quality economic opportunities are required for all major developments as stated in Local Plan Policy J4. These obligations work together by ensuring there is a well-supported process to identify, train and support suitable local candidates for the roles prioritised for local residents.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/108	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			Hadley believes that the payment provision for 50% end-user phase jobs for Newham residents clashes with the international vision for Stratford Metropolitan Centre as this might discourage major commercial development tenants from being attracted to base here	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/109	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			In addition, the financial contribution is based on £3,867 per job. Hadley seeks confirmation as to whether this obligation has been viability tested and how it has been calculated. The financial contribution should be reflective of the market conditions at the time it is calculated.	This wording change has not been made as the financial contribution calculation was being tested in the viability assessment. The cost per London Borough of Newham resident into training and full time employment was identified using the average cost per job for the Our Newham Work European Social Fund (ESF) contract being delivered by Our Newham Work.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/110	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c			Overall, there should be flexibility in the provision of on-site employment opportunities and the financial contribution based on viability within the policy.	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents through a secured amount of tariff-based contribution on local training and employment in both construction and end-user stage. The percentages were previously set out in the adopted local plan and is proved deliverable over the plan period. The financial contribution calculation was being tested in the viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/014	Inclusive Economy	J2 New employment floorspace					J2.3 P.155 J2 New employment floorspace – Implementation J2.3 Comment: We ask that affordable workspace (plus any creative and wellbeing spaces) work with important considerations around sustainability and circular/sharing economy businesses.		This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floor space are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/015	Inclusive Economy	J2 New employment floorspace					J2.3	We ask that affordable and creative workspaces supply space to local graduates and students who are working with upcycled, recycled and sustainably sourced and made products.	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/016	Inclusive Economy	J2 New employment floorspace					J2.3	We ask that the Council consult with local colleges, universities, plus organisations such as 'Green Grads', to find suitable graduates, students and creative-makers to offer space to. (The University of East London and the London College of Fashion could be approached to offer space to graduates working on sustainable design.)	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/017	Inclusive Economy	J2 New employment floorspace					J2.3 We ask that organisations such as The Green Skills Centre at the College of North West London (but better yet still local colleges who teach similar skills if available) be offered space for green training/apprenticeship initiatives.	A change to this policy approach has not been made. We did not consider this change to be necessary as high quality economic opportunities for the local residents will be secured through seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement as set out in Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/018	Inclusive Economy	J2 New employment floorspace					J2.3	Local groups, working in this area (such as the Dorset Road Community Garden who put in for Community Assembly money to teach solar panel installation) should we believe be offered a say in how such spaces could be run	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/019	Inclusive Economy	J2 New employment floorspace					J2.3	Such groups and local people who help to use their knowledge to create fantastic opportunities for local people to learn 'green' skills.	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/020	Inclusive Economy	J2 New employment floorspace					J2.3	Could affordable workspaces include hot-desking opportunities, to reduce the carbon footprint from travelling to places of work.	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4. All developments incorporating employment floorspace are required to support transition to a greener economy as set out in Local Plan Policy J4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/040	Inclusive Economy							Extension to Existing SIL to East LBN's strategic priorities regarding employment are set out in Policy J1 (Employment and Growth) and J2 (New Employment Space) of the Regulation 18 Consultation Draft.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/041	Inclusive Economy	J1 Employment and growth	Stratford Metropolitan Centre					These policies build on the findings of the Employment Land Study (2022) which outlined the exponential growth in the industrial sector in Newham and the need for the Borough to play a significant role in meeting the wider regional needs of the CAZ by providing much needed servicing	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/042	Inclusive Economy	J1 Employment and growth			Part 1			Since the 2017 Employment Land Study, the need for industrial floor space in the borough has doubled and draft Policy J1 requires 335,000 sqm (or 51ha) of employment floorspace to be delivered over the new plan period. Wider reports from Glenny's also suggest that the demand as of September 2022 for Industrial floorspace is 12.1m sqft due to the current deficit of industrial employment space in East London.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/043	Inclusive Economy	J1 Employment and growth			SIL1 London Industrial Park			As outlined previously, the Site is bound immediately to the east by the London Industrial Park, which is recognised as a Strategic Industrial Location (SIL.1) within the Regulation 18 Consultation Draft, as well as a preferred Industrial Location in the London Plan (2021).	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/044	Inclusive Economy	J1 Employment and growth			Part 2a			Draft Policy J1 states that all SILs must intensify their site use, with a particular focus on warehouses and logistics for London Industrial Park. The Employment Land Review (2022) also concluded that the land at London Industrial Park lends itself to intensification and that its current success is illustrated through only one unit being available to rent at the time of the assessment.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/045	Inclusive Economy	J1 Employment and growth						Although the draft Local Plan allocates land to meet the expected increase in demand for industrial land, the Employment Land Review (2022) states that opportunities to find new land for additional employment uses are few and far between and identified that there are currently no new sites available to meet the need for industrial land.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/046	Inclusive Economy	J1 Employment and growth						The London Plan sets ambitious growth targets for new jobs in the borough, with circa 41,500 identified for the Royal Docks and Beckton Riverside Area, it further challenges boroughs to look at ways of maximising job opportunities from the identified SILs, with intensification or adaptation obvious routes.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/047	Inclusive Economy	J1 Employment and growth			SIL1 London Industrial Park			<p>We would also submit that the boundaries of SIL areas be reconsidered, and where feasible and logical extensions made to increase the pool of developable land – the Beckton Alp site represents one such opportunity to enlarge the London Industrial Park.</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:</p> <ul style="list-style-type: none"> • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. <p>Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022).</p> <p>The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site</p>

Comment Response	Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
Comment	
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/011	Inclusive Economy	J1 Employment and growth			Part 1			Policy J1: Employment and Growth We strongly support the Council's approach to deliver 335,000 sqm of industrial floorspace over the plan period to 2038 which will be directed towards SIL and LIL locations and will seek to boost employment and growth opportunities in the Borough.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/012	Inclusive Economy	J1 Employment and growth			LIL12 Albert Island			It is also noted that Albert Island remains to be designated as a LIL (Local Industrial Location) (LIL12 – Albert Island) which reflects the character and ongoing development of the site and recognises the role that the development site can play to support this wider employment objective.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/013	Inclusive Economy	J1 Employment and growth			Table 7			It is also appreciated that Table 7 accurately reflects the development site's priority uses as large scale industrial and warehousing uses and marine engineering (and boatyard), high technology and construction training, as per the planning application scheme.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/016	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Policy J4: Community Wealth Building Draft Policy J4 sets out that all employment schemes need to demonstrate a commitment to Community Wealth Building and ensure that as a minimum, all major commercial developments (including mixed use) must help Newham residents access high quality employment in both the construction and end-user stage by providing a tariff-based contribution and an Employment Strategy which secures 35 per cent construction phase and 50 per cent end-user phase jobs for Newham residents.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/017	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Planning Obligations			<p>In terms of planning obligations, we note that the supporting text of the Draft Policy J4 requires the following:</p> <ul style="list-style-type: none"> - Construction Phase: The total number of jobs will be calculated using the assumed direct jobs per £1million of construction investment (HCA cost per jobs 2015 3rd edition). 35 per cent of total jobs x £3,867 (cost (£) per London Borough of Newham resident into training and full time employment) = financial contribution. - End User Phase: The total number of jobs will be calculated using the assumed employee yield (using HCA Employment Densities for B2 uses (36 sqm GIA per full time employee), 2015 3rd Edition), 50 per cent of total end user jobs x £3,867 cost (£) per London Borough of Newham resident into training and full time employment = financial contribution). <p>The proposed obligations raise the tariff from £3,163 per job to £3,867.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/018	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Planning Obligations			As such, we would be keen to gain further information on the justified reasoning behind the increase of the cost (£) per London Borough of Newham resident into training and full time employment and review the appropriate evidence base documents which supports this considerable change, as this is not provided within the supporting documents published online.	The financial contribution calculation was being tested in the viability assessment. The cost per London Borough of Newham resident into training and full time employment was identified using the average cost per job for the Our Newham Work European Social Fund (ESF) contract being delivered by Our Newham Work.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/029	Inclusive Economy	J1 Employment and growth						Conclusions In summary, our client strongly supports the aspirations of the Draft Newham Local Plan, including the principle of encouraging industrial development in this part of the Royal Docks and within the Local Industrial Location designation.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/031	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Planning Obligations			Further justification to support the increased cost for S106 obligations per London Borough of Newham resident into training and full time employment should also be provided.	This wording change has not been made as the financial contribution calculation was being tested in the viability assessment. The cost per London Borough of Newham resident into training and full time employment was identified using the average cost per job for the Our Newham Work European Social Fund (ESF) contract being delivered by Our Newham Work. Our colleagues in the Community Wealth Building Team are able to help. We have also provided them with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/038	Inclusive Economy	J1 Employment and growth			Part 1			Economy Draft Policy J1 – Employment and Growth Draft Policy J1 identifies a need in the Borough to deliver 335,000 sqm of industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/039	Inclusive Economy	J1 Employment and growth			Part 2a			. Specifically, the policy wording states that the development of industrial uses within Use Class E(g) ii and iii, B2, B8 and appropriate Sui Generis Uses (including waste, utilities including digital/data and transport depots) should be located in Strategic Industrial Locations and Local Industrial Location	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/040	Inclusive Economy	J1 Employment and growth			Part 2f			Accordingly, on non-designated industrial land, industrial uses should not be introduced through proposed site allocations.	This wording change has not been made. We did not consider this change to be appropriate as we require industrial land to be delivered on site allocations where they were created through managed release on Strategic Industrial Locations in the adopted Local Plan, for the reason to protect some of the lost capacity. This requirement has taken into consideration the recommendations in the Employment Land Review (2022) and the function of these industrial uses as buffer between designated industrial locations and residential neighbourhoods.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/041	Inclusive Economy	J1 Employment and growth			Part 2			The emphasis of the Draft Local Plan should focus on intensification of designated employment land to ensure it operates efficiently and effectively.	This wording change has not been made. We did not consider this change to be necessary as according to Local Plan Policy J1, employment uses are supported on specific sites as set out in the development principles of the site allocations.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/042	Inclusive Economy	J1 Employment and growth			Part 2f			Criteria 2 (f) states that the development of a range of employment spaces to support the growth of new economic sectors, within E(g) Commercial, Business and Service and B uses (General Industry and Storage and Distribution), are supported on site allocations identified for mixed use or employment-led development.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/043	Inclusive Economy	J1 Employment and growth				3.117		Specifically, paragraph 3.117 identifies that the Employment Land Review (2022) highlights that permitted office floorspace growth has been confined to the London Legacy Development Corporation area and the Royal Docks, with the rest of the Borough experiencing more floorspace lost than gained, with significant uncertainty around the delivery of the pipeline schemes.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/044	Inclusive Economy	J1 Employment and growth				3.117		As such, the study concludes that office space should be directed towards Stratford Metropolitan Centre, due to its existing infrastructure and connectivity, although it is noted that the policy does allow for flexibility within this approach.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/045	Inclusive Economy	J1 Employment and growth	Stratford Metropolitan Centre		Part 2			We would therefore expect the Council to welcome similar uses on site allocations identified for mixed use or employment-led mixed use located in close proximity to the Stratford Metropolitan Centre	A change to this policy approach has not been made. We did not consider this change to be appropriate as Local Plan Policy J1 directs offices primarily to the town centres and then the edge-of-centre Micro Business Opportunities Areas. This is to manage the oversupply of office floorspace in the borough especially in the LLDC area, as demonstrated in the Employment Land Review, and to support the town centre first approach. No further office space is required in the borough, and site allocations only include land uses required to meet identified needs. Employment uses outside the town centres and MBOAs are subject to requirements as set out in Local Plan Policy J2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/046	Inclusive Economy	J1 Employment and growth	Stratford Metropolitan Centre		Part 2			The proximity of the site from the town centre (0.3 miles) makes it appropriate for office floorspace to be supported.	A change to this policy approach has not been made. We did not consider this change to be appropriate as Local Plan Policy J1 directs offices primarily to the town centres and then the edge-of-centre Micro Business Opportunities Areas. This is to manage the oversupply of office floorspace in the borough especially in the LLDC area, as demonstrated in the Employment Land Review, and to support the town centre first approach. No further office space is required in the borough, and site allocations only include land uses required to meet identified needs. Employment uses outside the town centres and MBOAs are subject to requirements as set out in Local Plan Policy J2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/047	Inclusive Economy	J1 Employment and growth					J1.2	We note explanatory text J1.2 which sets out that employment uses proposed on site allocations identified for mixed use or employment-led mixed use, will be expected to deliver a range of employment uses.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/048	Inclusive Economy	J1 Employment and growth					J1.2	. Applicants must align their proposals with the spatial strategy, site allocation objectives and local market evidence as part of an Employment Strategy.	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Comment noted.	Proposals that deviate from the priority uses will need to be sufficiently justified by economic evidence justifying the location and market demand.	J1.2					J1 Employment and growth	Inclusive Economy	Reg18-E-068/049	Hollybrook Homes	Reg18-E-068

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/050	Inclusive Economy	J1 Employment and growth					J1.2	We strongly support the flexibility and recognition within draft Policy J1 that land uses should be informed by local market evidence, including on site allocations, to ensure development proposals are able to provide an appropriate response to market challenges and to ensure development proposals that come forward are financially viable and maximise their potential for occupation.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/051	Inclusive Economy	J1 Employment and growth			Employment Land Review		J1.2	We have also had full regard to the evidence base, particularly the findings and conclusions of the Employment Land Review (2022).	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/052	Inclusive Economy	J1 Employment and growth			Employment Land Review		J1.2	The conclusions highlight that the report is absent from robust data and has been undertaken in the context that the most recent data is 'contaminated' by lockdowns and the Covid crisis, and as a result there is an unusual degree of risk and uncertainty in the data	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/053	Inclusive Economy	J1 Employment and growth					J1.2	Therefore, this reaffirms our clients support for ensuring local market evidence available at the time development proposals come forward is taken into full consideration and is a material consideration as part of any planning decision when assessing the most appropriate land use for site allocations and other development sites that may come forward in the Borough for non-residential uses	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/054	Inclusive Economy	J1 Employment and growth					J1.2	Non-residential uses should be market driven to ensure there is not a high proportion of vacant floorspace across the Borough, with industrial uses planned in advance through identified designated industrial areas.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/055	Inclusive Economy	J2 New employment floorspace			Part 3c			Draft Policy J2 – New Employment Floorspace We note that development proposals for new employment floorspace, outside of the locations identified in Policy J1, will be supported subject to satisfying a given criteria which includes the delivery of 100% affordable workspace	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/056	Inclusive Economy	J2 New employment floorspace			Part 3c			Whilst we support the provision of affordable workspace, to provide a balanced economy and deliver local job opportunities, we consider that some flexibility should be awarded to the policy wording to prevent a range of proposals for employment floorspace from coming forward that would be otherwise be deemed unviable	This wording change has not been made. We did not consider this change to be necessary as providing affordable workspace is not a requirement for employment proposals but instead is adding flexibility to enable employment floorspace to be delivered outside designated employment locations as exception to our spatial strategy. All developments are required to submit an Economic Strategy to prove that the proposals are viable according to Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/057	Inclusive Economy	J2 New employment floorspace			Part 3c			Rather, we would advocate that affordable workspace is provided as part of an important and varied mix of employment floorspace in the Borough.	This wording change has not been made. We did not consider this change to be necessary as providing affordable workspace is not a requirement for employment proposals but instead is adding flexibility to enable employment floorspace to be delivered outside designated employment locations as exception to our spatial strategy. All developments are required to submit an Economic Strategy to prove that the proposals are viable according to Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/058	Inclusive Economy	J3 Protecting employment floorspace			Part 1			Draft Policy J3 – Protecting Employment Floorspace Whilst we agree that employment floorspace in Strategic Industrial Locations and Local Industrial Locations should be safeguarded,	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/059	Inclusive Economy	J3 Protecting employment floorspace			Part 1			we wish to highlight that the Secretary of State removed reference to “no net loss” in the London Plan as part of the Schedule of Modifications to provide a more proportionate stance and allow Councils to make the optimal use of industrial land where housing is in high demand, in accordance with the wider strategic policies of the London Plan.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/060	Inclusive Economy	J3 Protecting employment floorspace			Part 1			[no net loss of industrial land in London Plan] We would therefore advocate a consistent approach in this regard.	This wording change has not been made. We did not consider this change to be appropriate as the National Planning Policy Framework and London Plan requires boroughs to assess their local need for employment land and make sufficient provision. The Employment Land Review (2022) has been undertaken and indicates that the pipeline supply of industrial land is not sufficient to meet need. The Employment Land Review also highlights Newham's important strategic role as a key industrial property market area and in close proximity to the Central Activity Zone. As such, the Local Plan goes further than the London Plan position to protect industrial land and industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. The GLA has indicated they are supportive of this approach (see their representations).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/061	Inclusive Economy	J3 Protecting employment floorspace			Part 2, Part 3, Part 4			Notwithstanding, we note that criteria 2, 3 and 4 of draft Policy J3 do acknowledge that there are some limited circumstances where a net loss is considered appropriate, subject to satisfying a given criteria and this recognition is welcomed.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/062	Inclusive Economy	J3 Protecting employment floorspace			Part 2a		J3.1 and J3.2	<p>Specifically, criteria 2 (a) states that developments are required to relocate any existing businesses to suitable alternative employment premises or sites.</p> <p>[We note that explanatory text J3.1 and J3.2 states that the relocation strategy must demonstrate that reasonable endeavours have been made to relocate existing businesses to a suitable alternative site in Newham which is suitable for the business's local and regional economic role</p> <p>We would therefore advocate that the policy wording also utilises the same terminology to allow for a consistent approach and avoid ambiguity on its application.]</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/063	Inclusive Economy	J3 Protecting employment floorspace			Part 2a		J3.1 and J3.2	<p>[Specifically, criteria 2 (a) states that developments are required to relocate any existing businesses to suitable alternative employment premises or sites.]</p> <p>We note that explanatory text J3.1 and J3.2 states that the relocation strategy must demonstrate that reasonable endeavours have been made to relocate existing businesses to a suitable alternative site in Newham which is suitable for the business's local and regional economic role</p> <p>[We would therefore advocate that the policy wording also utilises the same terminology to allow for a consistent approach and avoid ambiguity on its application.]</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/064	Inclusive Economy	J3 Protecting employment floorspace			Part 2a		J3.1 and J3.2 <p>[Specifically, criteria 2 (a) states that developments are required to relocate any existing businesses to suitable alternative employment premises or sites.</p> <p>[We note that explanatory text J3.1 and J3.2 states that the relocation strategy must demonstrate that reasonable endeavours have been made to relocate existing businesses to a suitable alternative site in Newham which is suitable for the business's local and regional economic role]</p> <p>We would therefore advocate that the policy wording also utilises the same terminology to allow for a consistent approach and avoid ambiguity on its application.</p>		This wording change has not been made. We did not consider this change to be necessary as we consider that the terminology is aligned, simply more detail is provided in the implementation text for Local Plan Policy J3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-054	UrBox Beckton Limited	Reg18-K-054/004	Inclusive Economy	J1 Employment and growth			Part 2b		J1.2	UrBox Beckton Limited support the principle of industrial intensification on existing retail and leisure parks to help meet the Borough's need for new industrial and warehousing/distribution floorspace."	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
Comment noted.		0.5. INCLUSIVE ECONOMY No comment						Inclusive Economy	Reg18-E-070/065	Aston Mansfield	Reg18-E-070

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/024	Inclusive Economy	J1 Employment and growth			Part 2			5. Employment a. Draft Policy J1 (Employment and growth) <u>SEGRO supports the general approach within the draft Policy to encourage the growth of employment uses, particularly industrial uses, and the spatial approach to delivering this via part 2 of the draft Policy.</u>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/025a	Inclusive Economy	J1 Employment and growth			SIL.2, SIL.6, LIL7			<u>In particular, SEGRO supports the priority uses for SIL.2. British Gas / Cody Road, SIL.6. Bow Goods Yard and LIL7. Beckton Gateway (set out in Tables 6 and 7).</u>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/025b	Inclusive Economy	J1 Employment and growth			SIL.6			Particularity at Bow Goods Yard, the reference to freight related uses / distribution / light industrial is welcomed as this offers a good opportunity to increase the supply of warehousing space and to decarbonise the movement of goods in and out of London via rail.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/026	Inclusive Economy	J1 Employment and growth			Table 8			<u>SEGRO supports the principle of co-location with residential development in Local Mixed Use Areas set out in Table 8.</u> It has been demonstrated across London that well-designed logistics and light industrial uses can complement residential development.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/027a	Inclusive Economy	J1 Employment and growth			Table 12			It is noted that Table 12 supporting the draft Policy assumes that 75% of LBN's gross supply of industrial floorspace will come from sites with the potential for intensification. SEGRO strongly supports the principle of intensification,	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/027b	Inclusive Economy	J2 New employment floorspace						[SEGRO strongly supports the principle of intensification,] but it is important to understand that intensification is not always appropriate/viable. Therefore, it is imperative that the draft Plan acknowledges this and ensures that there is a supportive policy context for sites coming forward for industrial development which are not allocated (e.g. windfall sites and the re-use of retail parks) in order to supplement the supply that comes forward from intensification. We set out further comments on the intensification point below in respect of draft Policy J2.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/028a	Inclusive Economy	J2 New employment floorspace			Part 1			<p>b. Draft Policy J2 (New employment floorspace) Part 1 of the draft Policy states that all development proposals on SIL and LIL must intensify site use to deliver a net increase in industrial floorspace. SEGRO supports the acknowledgement of London Plan (Policy E7) which encourages the intensification of industrial land via various routes. SEGRO notes that there could be some opportunities for intensification of existing industrial areas in LBN, potentially with them being redeveloped for multi-storey schemes in the future, if viability conditions and occupiers' confidence in this typology improve.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/028b	Inclusive Economy	J2 New employment floorspace			Part 1			<p>However, it must be acknowledged that intensification, particularly the development of industrial multi-storey is at the relatively early stages of development. Multi-storey requires large capital injections and build costs that are approximately 3-4 times more expensive than traditional warehousing, which would render some sites/schemes unviable. Therefore, it will not be suitable in all instances and is unlikely to be deliverable in the foreseeable future without subsidy. This is acknowledged in LBN's Employment Land Review (2022) at para 23:</p> <p><i>"Intensification is, as set out in the London, the main route to meeting economic needs but remains largely untested and at a 'pilot stage'. It is vital that the plan continues to support intensification and promote the multi-deck format as a starting point for intensification because it is sensible planning strategy that makes the best use of limited land. The Boroughs large SIL sites needs strong current and future protection to ensure that, when the market is able, that sites are available that are free of constraints and can accommodate intensive formats. But the evidence is not available today to rely on intensive formats to meet today's need for space. The market is already</i></p>	<p>This wording change has not been made. We did not consider this change to be necessary as industrial intensification can take many forms, where stacked industrial building is one of them and as suggested in the London Plan. Local Plan Policy J2 allow flexibility for developments to adopt different intensification format to cope with their business need.</p>

<p>Comment Response</p>	
<p>Comment</p>	
<p>Implementation</p>	<p><i>undersupplied and cannot wait for new formats."</i></p>
<p>Justification</p>	
<p>Clause</p>	
<p>Introduction</p>	
<p>Site allocation</p>	
<p>Policy</p>	
<p>Chapter</p>	
<p>Comment Reference</p>	
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<p>Representation Reference</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/029	Inclusive Economy	J2 New employment floorspace			Part 1			<p>It is also important to note that some industrial/logistics typologies require large yard areas and, therefore, redeveloping an old-style industrial site (for example, one with outdated but two storey light industrial buildings) for a new logistics warehouse with a large yard, may not intensify the employment floorspace on the site but it is nonetheless meeting an important need. SEGRO's recently completed development at 23-33 Brunel Road, Westway Trading Estate is an example of this. Here, 3x dated buildings which were both environmentally inefficient and unattractive to modern business use were replaced with a net zero carbon building with an Excellent BREEAM rating. The redevelopment resulted in a net loss of 540 sqm of floorspace (from 1,965 to 1,425 sqm) but significantly improved the quality of space and its suitability for modern business. The new unit is now occupied by Taiko Foods, a modern manufacturer of sushi, bentos and other Japanese food which supplies to businesses such as Pret a Manger and Waitrose. [image of 23-33 Brunel Road on pg 5 of rep / image of old buildings at 23-33 Brunel Road on pg 6 of rep]</p>	This wording change has not been made. We did not consider this change to be necessary as Local Plan Policy J3 is clear that industrial intensification in floorspace also includes yard space.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/030	Inclusive Economy	J2 New employment floorspace			Part 1			For these reasons SEGRO considers that, as drafted, part (1) of draft Policy J1 is overly rigid as it states that all proposals on SILs and LILs “ must intensify use to deliver a net increase in industrial floorspace ” (our emphasis).	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/031	Inclusive Economy	J2 New employment floorspace					J2.1	The supporting text at para J2.1 is more flexible and states that proposals which seek to intensify industrial and logistics uses within SILs and LILs “ will be supported in principle ” and that all industrial proposals are “ expected to explore the scope for multi-deck as a priority, followed by other formats... ”, and suggests that proposals which cannot deliver net increases in industrial floorspace will be accepted when this can be evidenced. SEGRO supports the cascade approach set out within the supporting text, which would allow other approaches where intensification is not feasible.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/032	Inclusive Economy	J2 New employment floorspace					J2.1	SEGRO also supports the flexibility contained within the supporting text which acknowledges that it will often not be possible to deliver an increase in floorspace. Depending on the existing site's context and characteristics, upgrading and enhancing industrial use will not always necessarily equate to an increase in floorspace.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/033	Inclusive Economy	J2 New employment floorspace			Part 1		J2.1	Therefore, <u>SEGRO requests that part 1 of draft Policy J1 be amended to reflect the approach set out in the supporting text (para J2.1). The following amendments are proposed:</u> <u>“All development proposals on Strategic Industrial Locations and Local Industrial Locations [delete: must] should aim to intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification typology for meeting business needs.”</u>	This wording change has not been made. We did not consider this change to be appropriate as the Employment Land Review (2022) indicates that the pipeline supply of industrial land is not sufficient to meet need. The Employment Land Review also highlights Newham's important strategic role as a key industrial property market area and in close proximity to the Central Activity Zone. As such, the Local Plan requires industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. The GLA has indicated they are supportive of this approach (see their representations).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/034a	Inclusive Economy	J2 New employment floorspace			Part 3			SEGRO supports the principle of part 3 of the draft Policy as it is important for the draft Plan to acknowledge the scope of alternative sites coming forward into the supply chain.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/034b	Inclusive Economy	J2 New employment floorspace			Part 3		<p><u>SEGRO supports the principle of part 3 of the draft Policy</u> as it is important for the draft Plan to acknowledge the scope of alternative sites coming forward into the supply chain.] However, the requirements set out in part 3 should be more flexible and provide more scope to support employment uses in areas not identified in Policy J1. There is no reason why an employment use should not be permitted on a particular site if the use can be demonstrated to be neighbourly and not prejudice other strategic targets of the draft Plan coming forward. <u>Therefore, SEGRO suggests the following amendments to part 3:</u></p> <p><u>“Development proposals for new employment floorspace, outside of the locations identified in Policy J1, will be supported where it can be demonstrated that employment use would be compatible with the site location, giving due consideration to the requirements set out in Policy D7 (neighbourliness), and where the proposal would not compromise the ability of site allocations to come forward. [delete: if the following criteria is met:</u></p> <p><u>a. The proposal results in an increase in employment floorspace (particularly for general, light and storage</u></p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as employment uses are directed to various designations according to Local Plan Policy J1 and supported by the Employment Land Review. Flexibility to deliver employment uses outside the designated areas or site allocations is allowed subject to requirements as set out in Local Plan Policy J2 to bring economic benefit to the local community. We consider this provides sufficient flexibility, acknowledging the need for alternative priority land uses, including housing and the economic benefits of ensuring there is a sufficient, but not oversupply of employment land.</p>	

<p>Comment Response</p>	
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<p>Implementation</p>	<p><u>to support local supply chains) on an existing nondesignated industrial site of 0.1ha or more, or where operational employment generating floorspace compromises of 1,000 sqm; or</u> <u>b. The proposals will deliver employment floorspace in an area which is not currently covered by the 15 minute network of economic opportunities for residents; or</u> <u>c. The proposal will deliver 100 per cent affordable workspace.”]</u></p>
<p>Justification</p>	
<p>Clause</p>	
<p>Introduction</p>	
<p>Site allocation</p>	
<p>Policy</p>	
<p>Chapter</p>	
<p>Comment Reference</p>	
<p>Representor</p>	
<p>Representation Reference</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/035	Inclusive Economy	J3 Protecting employment floorspace			Part 1			c. Draft Policy J3 (Protecting employment floorspace) <u>SEGRO strongly supports the general approach in part 1 to protect employment space,</u>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/036	Inclusive Economy	J3 Protecting employment floorspace			Part 1			<p><u>however the metric used should be land, not floorspace.</u> On some sites, upgrading and enhancing industrial use may well result in a loss of floorspace – for example where an old, inefficient building previously used for workshops is redeveloped into warehousing which requires significant areas of yard space to operate. This would still deliver significant planning benefit – through increasing employment opportunities, responding to market demand and providing buildings and uses which can help decarbonise the environment. The use of an employment floorspace metric is considered unduly onerous and does not recognise all the needs of the industrial/logistics market.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as Local Plan Policy J3 is clear that industrial intensification in floorspace also includes yard space.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/037	Inclusive Economy	J3 Protecting employment floorspace			Part 2			<p>Whilst part 2 of the draft Policy does allow for net losses in floorspace, this does come with potentially onerous requirements in terms of providing financial contributions towards skills, training and local employment in mitigation. This assumes that a loss of employment floorspace will always have a negative impact on business/employment within the borough which is not always the case (for example, where a long term vacant older industrial building is redeveloped for an employment use with less floorspace but quite intensive job creation). <u>Parts 2(a) and 2(b) therefore should be reviewed to ensure that developments which meet the current needs of the market, delivering economic investment and jobs, are not unfairly penalised for failing the metric of a loss of floorspace.</u></p>	<p>This wording change has not been made. We did not consider this change to be appropriate as the SILs and LILs are expected to optimise their use, including yard space, by intensification to meet the need of industrial floorspace as directed by the Employment Land Review.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/038	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						d. Draft Policy J4 (Delivering community wealth building and inclusive growth) <u>SEGRO is committed to investing in local communities and environments and ensuring responsible development and strongly supports the principle of Community Wealth Building.</u>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/039	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c & Planning Obligations	3.129		<p>However, SEGRO is concerned that as drafted, part 1(c) of draft Policy J4 is very restrictive and may well hinder development from coming forward and for community benefits to be realised. There is no acknowledgement of instances where it would be unviable to meet the targets. The supporting text (para 3.129) states:</p> <p>“This policy aims to create new opportunities including targeted support and securing new opportunities for local residents to develop skills, knowledge and training to have a role in Newham’s economic future.”</p> <p>Achieving this aim is dependent upon employment-generating development being delivered in LBN. There may well be instances where the targets cannot be met – for example, achieving 50% end-user phase jobs for LBN residents may not be feasible for some uses and may discourage tenants and therefore investment and development. The contributions towards skills, training and local employment have very high rates – based on c. 17,500 sqm scheme construction costs would be in the region of £110,000 and operational costs would be c. £950,000. These costs are substantial and could well render some schemes unviable to come forward. The %s and £ figures do not appear to have any justification or be evidenced</p>	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

<p>Comment Response</p>	
<p>Comment</p>	
<p>Implementation</p>	<p>based. <u>SEGRO strongly recommends that these targets are reviewed to ensure that they do not place unreasonable burdens on employment generating development coming forward in LBN.</u> Without adequate development, the policy will fail in its aim to secure opportunities for local residents.</p>
<p>Justification</p>	
<p>Clause</p>	
<p>Introduction</p>	
<p>Site allocation</p>	
<p>Policy</p>	
<p>Chapter</p>	
<p>Comment Reference</p>	
<p>Representor</p>	
<p>Representation Reference</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/040	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 1c & Planning Obligations			We also note that the viability report included in LBN's evidence base suggests that <u>the employment and training contributions be applied on a flexible and 'subject to viability' basis and SEGRO would support this approach.</u>	This wording change has not been made. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/041	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			Part 3			In respect of <u>part 3</u> , it is <u>considered that this requires clarification</u> . Parts (d) and (e) refer to green technology/green industries but no further guidance is provided on exactly what these categories cover.	This wording change has been made. Please see the new wording in Glossary and Abbreviation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-054	UrBox Beckton Limited	Reg18-K-054/003	Inclusive Economy	J1 Employment and growth			Part 2b			UrBox Beckton Limited support the principle of Policy J1: Employment and growth, specifically in relation to Part B of Policy J1, which supports the development of industrial uses to be located on retail and leisure parks with good accessibility to strategic road networks. "	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/002	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			The site [199-203 Freemasons Road, Canning Town E16 3PY] is suitable for redevelopment for a variety of residential type uses to make the best use of the land. Although the site has an existing allocation (LMUA14) for employment led, mixed use development.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/004	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Considering the site's location, residential led (C class uses, student and/or large shared living accommodation), mixed use development would be most appropriate now, compared to 2018 when the allocation was first adopted.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/005	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			A small part of the site is a plot of land in third party ownership and is included in this representation. Non-inclusion of this land does not prejudice the ability for development – development can be phased in any case	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/006	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			These representations consider it sensible to seek a comprehensive development on this land [199-203 Freemasons Road, Canning Town E16 3PY] rather than sporadic development elsewhere. The preferred form of the development can be discussed with the Council	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/008	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] In addressing planning considerations, issues of principle relating to change an employment allocation to mixed use, residentially led; with housing need and delivery have been considered.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/009	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Site and Surroundings The site occupies an entire street block bounded by Freemasons Road to the east, the A13 to the north, Beeby Road to the west and existing housing to the south. The majority of the site is under the ownership of the Millennium Group; a small parcel of land is under third-party private ownership; the majority of the Beeby Road frontage is owned by LB Newham; and the southern section is a Job Centre (also partially controlled by LB Newham). The site contains a range of 1,285 sqm Class E (financial), 2,477 sqm Class E (light industrial) and Class B8 (warehouses); and 1,131 sqm Class F1 (non-residential education). It has moderate to low public transport accessibility with a PTAL of 2/3.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/010	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Planning History There have been several applications at the site, all pertaining to 203 Freemasons Road. There is no planning history for 199 or 201 Freemasons Road. The 203 Freemasons Road applications date between 1957 and 2020. There have been applications to convert the existing B8 warehouse to alternative uses including community, education and/or offices, none of which have been permitted.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/011	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Stakeholder Engagement 2018 In 2018 an informal meeting with stakeholders at LB Newham estates and planning took place, and a proposal was presented by RMA Architects for buildings ranging from 2 to 11 storeys situated on a single storey podium covering the entire site that could be delivered in phases. The greatest height was proposed fronting the A13 gradually dropping down to three storeys at the south with the buildings arranged in a U shape with a podium garden in the centre. The podium was proposed to be bookended by a large (commercial) building fronting A13 and the Beeby Road and Freemasons Road frontages were proposed to be lined with undefined flexible uses (undefined 1,737 sqm) with access points to the residential above (204 units). Car parking (128 spaces) was proposed in the centre below the podium for the residential development. Stakeholder Engagement Response The meeting was held on 2 July 2018 with James Burton and James Bolt from LB Newham. The meeting did not provide a formal steer on bulk and massing and the discussion centred on site assembly and the wider benefits that development could offer. It was advised that the site would deliver greater public benefit if it was developed comprehensively and was, as per the allocation, employment led (with a	Comment noted.

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Implementation	specific employment use and an end user in mind).
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/013	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] However, as with the Local Plan Review (five years after adoption), a review of land and its development potential should be revisited.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area for employment-led mixed use to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space as discussed in the Employment Land Review. Flexibility in co-locating with residential use within the site is provided according to Local Plan Policy J1. The call for sites submission was assessed in line with the methodology note Site Allocation and Housing Trajectory Methodology Note and did not meet the criteria for inclusion given its employment designation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/014	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Development in the Locality Planning permission 08/01599/FUL highlights 649 residential dwellings of various building heights of part 10, part seven storeys. This site is approximately 0.4 miles (eight minutes' walk) from the site, highlighting the close proximity of tall buildings within the site's setting. The Council considers tall buildings to be six or more storeys. Any site that proposed a tall building was/is allocated for residential development.	Comment noted. Tall Buildings can also contain non-residential uses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/015	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Comprehensive development was encouraged by the Council in 2018, and similar to the purpose of the Local Plan Review, the allocation of developable land should also be reassessed.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area for employment-led mixed use to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space as discussed in the Employment Land Review. Flexibility in co-locating with residential use within the site is provided according to Local Plan Policy J1. The call for sites submission was assessed in line with the methodology note Site Allocation and Housing Trajectory Methodology Note and did not meet the criteria for inclusion given its employment designation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/017	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Considering the location of the site, its setting, the residential character of the immediate area and recent regeneration in the vicinity, it is prudent to consider changing the site's allocation to a residential lead as oppose to employment. Housing need may outweigh employment need for the Council, and recent planning applications at the site show the Council is hesitant to permit employment uses and/or employment-generating uses at the site (specifically between 2009 and 2020).	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area for employment-led mixed use to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space as discussed in the Employment Land Review. Flexibility in co-locating with residential use within the site is provided according to Local Plan Policy J1. The call for sites submission was assessed in line with the methodology note Site Allocation and Housing Trajectory Methodology Note and did not meet the criteria for inclusion given its employment designation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/019	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			<p>Summary</p> <p>There is precedent for residential led, mixed use (C class uses, student and/or large shared living accommodation) development being supported in the area as a lead use.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/020	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] There is a greater need for more housing and there is scope to amend the site's existing employment allocation to assist in delivering this. As the Council cannot demonstrate a five-year housing land supply (4.5 years), planning decisions should apply a presumption in favour of sustainable development.	This policy approach has not been changes. 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.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/022	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			<p>Additionally, the Council should support the redevelopment of under-utilised land that is not being permitted for conventional employment use (as recently as 2020 – ref. 20/00357/PRECOU) especially if development would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively</p>	<p>This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/025	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] The site has an allocation (site LMUA14) within the 2018 Newham Plan for employment led mixed use development located within a Local Mixed-Use Area (LMUA) and it sits outside and to the north of the Freemasons Road Local Centre (Policy LC12). Within LMUAs employment uses compatible with residential are protected and promoted and redevelopment should focus on the viable on-going operation of the employment. Lighter employment uses are therefore favoured.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/028	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			The site does not lie within the Canning Town tall building area concentrated around the town centre and the station. However, neither was the Keir Hardie Primary School development (ref. 08/01599/FUL) that permitted 649 dwellings. [not in Tall Building Zone]	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/030	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			The subject site [199-203 Freemasons Road, Canning Town E16 3PY] would support this area of residential development and associated infrastructure, acting as a natural extension that is cut off by Canning Town Recreation Ground (designated open space).	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area for employment-led mixed use to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space as discussed in the Employment Land Review. Flexibility in co-locating with residential use within the site is provided according to Local Plan Policy J1. The call for sites submission was assessed in line with the methodology note Site Allocation and Housing Trajectory Methodology Note and did not meet the criteria for inclusion given its employment designation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/032	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Although allocated for mix-use development, new housing (at least 7856 new units) is sought and not currently being reached.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/033	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Although the subject site is a large part of the existing allocation, there are other areas within the allocation and existing uses in the locality that can offer employment uses.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/038	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			The site [199-203 Freemasons Road, Canning Town E16 3PY] can be delivered in a phased manner across the plan period (in accordance with paragraph 67 and 68 of the NPPF) or all at once.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/039	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			The fact that the site [199-203 Freemasons Road, Canning Town E16 3PY] is brownfield land and precedent of large scale residential being permitted in close proximity, and the Council hesitance to permitting employment uses at the site demonstrates its change to residential development lead from employment led development would be reasonable.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1. The planning application at the site was refused for a reason of insufficient information submitted to understand the existing uses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/044	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Due to the siting of the land and the nature of the surrounding built development, the potential for redevelopment has been assessed against a residential context, but there is potential for a range of alternative C class, student and/or shared living led, and mixed uses at the site.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/045	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Principle of Development The site is allocated for employment led development in the Local Plan. The nature of the employment use is flexible, however, uses should be compatible with residential led development, which is the other appropriate use for the site alongside employment.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/046	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] However, due to changing needs the site is suitable and available for residential led development ahead of employment.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/047	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			<p>The Council has a shortfall in housing numbers and needs to find additional sites. The subject site is available for housing development, and to add to the Council's housing numbers for the Local Plan Review, there is an opportunity to allocate the site allocation. The Council's lack of housing land supply and the revised housing requirement set by the new standard method for local housing need, and the questionable ability to delivery housing, and its methods, show appropriate reasoning to allocate land in an area where the character of the area is predominately residential and large-scale residential development has been accepted in the past. This expansion would form a natural extension to a regenerated area to the west of the site (Hammerby Road) to support the Council's failing need for housing supply and delivery. The site [199-203 Freemasons Road, Canning Town E16 3PY] is assessed for evidence base purposes, it would assist the Council in meeting its housing need by providing housing within the plan period that was not previously the case prior to the 2018 Local Plan adoption. The site is readily available to help meet the Council's need and to help the borough meeting its housing need.</p>	<p>This policy approach has not been changed. 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>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/052	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Comprehensive Development (including third party and Council-owned sites) The Council is seeking a comprehensive redevelopment of the site. This means that development should be comprehensively planned and any proposals for one ownership should not prejudice the development of another ownership. The subject site is the amalgamation of land ownerships. Should phased development be preferred by the Council, an agreement with the other landowner to proceed jointly or recognition that the sites will come forward on a phased basis could be discussed, or the site can be developed in one phase.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/059	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Other Planning Benefits The provision of housing is a necessary component in meeting the economic and social roles of sustainable development, with the associated works meeting the environmental role, as defined in paragraph 8 of the NPPF.	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	Residential and/or residential-type development will represent a significant capital investment in the area.				LMUA14 Beeby Road	J1 Employment and growth	Inclusive Economy	Reg18-E- 112/060	Millenium Group	Reg18-E- 112

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/061	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Residential and/or residential-type development will improve local housing supply within Newham in the interest of social sustainability given the link between quality of life and access to an adequate choice of good quality housing.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/062	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			Proposed green infrastructure ecology of the site will support Canning Town Recreation Ground and overall enhance environmental sustainability.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/063	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] The proposed site is located in proximity to public transport provision, schools and shops, and the town centre. It is therefore considered to be a sustainable and appropriate location for development.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/065	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] As such, the provision of residential and/or residential-type development should be given substantial weight in the planning balance.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/066	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] We request that the Council consider the allocation of the site for mixed use residential led and/or residential-type use instead of employment.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/067	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] What is the potential capacity of the site? Studies indicate based upon neighbouring heights and density that a scheme ranging up to 7- 12 storeys could be deliverable. The number of units achieved could be up to 230 units including third-party and Council-owned land. Without this land, up to 150 units could be achieved.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/068	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Does the site have direct access to the existing highways network? Yes, via Newham Way (A13).	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/069	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] What access is there in terms of public transport? Yes, there are bus stops along Freemasons Road, with the closest stop 482 feet walking distance from the site (most northern point of site). The bus stops have services to East Beckton, Canning Town and Stratford City. The closest railway station is Custom Housel, which is 0.6 miles walking distance from the site.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/070	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Are there any known constraints to the site? There are no known constraints on the site.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/071	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] Are any of the following services on or to the site? The site is connected to existing water, electricity, gas, foul water and surface water sewer services.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/072	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] When do you think that the site could become available for the commencement of development? 0-5 years, but there is scope for the development of the site to be phased.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-112	Millenium Group	Reg18-E-112/073	Inclusive Economy	J1 Employment and growth			LMUA14 Beeby Road			[199-203 Freemasons Road, Canning Town E16 3PY] The following conclusions are drawn: 1. The principle of development on the site has been established through the well-established residential context. 2. The site provides a suitable location for a residential and/or residential-type development that will make a positive contribution towards improving housing choice in the area. 3. Residential and/or residential-type development would accord with the prevailing planning policy in terms of the NPPF and the Development Plan. 4. Residential and/or residential-type development will bring forward substantial planning benefits which go beyond the requirements of planning policy. Therefore, the site's allocation to residential development to allow for and/or residential-type development at the site should be supported.	This policy approach has not been changed. We did not consider this change as appropriate as the site is designated as Local Mixed Use Area after assessment through the Employment Land Review since the existing employment uses at the site has been found functioning well and should be protected in case of redevelopment. Flexibility to allow co-location with residential uses within this site is already provided within Local Plan Policy J1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/035	Inclusive Economy	J1 Employment and growth						<p>[Please provide any comments and feedback on the *Section 2: Vision and Objectives*.]</p> <p>You need to incentivise the right small businesses with a track record of success in better areas to set up shop here. I do not see mention of this in the Local Plan.</p>	<p>The Local Plan addresses this topic through encouraging growth industries to locate in the borough and secure employment spaces for local businesses in Local Plan Policy J1. However, it cannot deliver the change you have requested. The Regeneration Team works closely with businesses to attract investment into the borough. We have provided them with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/023	Inclusive Economy	J1 Employment and growth						<p>[Please provide any comments and feedback on the *Section 1: All about Newham*.]</p> <p>You need to incentivise the right small businesses with a track record of success in better areas to set up shop here. I do not see mention of this in the Local Plan.</p>	<p>The Local Plan addresses this topic through encouraging growth industries to locate in the borough and secure employment spaces for local businesses in Local Plan Policy J1. However, it cannot deliver the change you have requested. The Regeneration Team works closely with businesses to attract investment into the borough. We have provided them with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/007		H3 Affordable housing			2			[Please provide any comments and feedback on the *Introduction*.] [Housing and] commercial developments should include provision for genuinely affordable rents [and social housing.]	This wording change has not been made. We did not consider this change to be necessary as the provision of affordable workspace would be supported based on the needs for certain type of workspace in certain location which support Newham's economy according to Local Plan Policy J4.