

## Appendix 18: Transport Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/008	Transport	T1 Strategic transport						We would also find it helpful to have more detail/evidence on the Silvertown Tunnel and its impacts, especially where this may impact the London Borough of Barking and Dagenham	Comment noted.
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/011	Transport	T1 Strategic transport			T1.1			[see attached site plan] However, the full Bow East Goods Yard site, as required by National and London Plan policies should additionally be identified on the Policies Map as a 'Safeguarded Rail Freight Site'. There should be no issue with the principle of more than one allocation. Indeed it is noted that several of the 'Safeguarded Wharves' (for which there is very similar policy provision in the NPPF and London Plan) have a dual allocation on the Policies Map both as 'Safeguarded Wharf' and 'SIL' – reflective of their specific transport function. The same approach should be applied to the safeguarding of rail freight sites, such as Bow East, also located within SIL.	This wording change has been made. Please see the new wording in Policy T1 Strategic Transport that supports the safeguarding of strategic rail heads.
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/015	Transport	T1 Strategic transport					T1.1	Draft Policy T1: Strategic Transport - confirms that development will be required to protect and enhance the strategic transport network by, amongst other things, protecting Rail (including National Rail, Elizabeth line, Tube, DLR), Lines, stations and depots). It is not immediately clear if this is intended to include sites such as Bow East Goods Yard. Safeguarded Wharves are individually referenced and certainly there is a clear National and London Plan requirement that safeguarded railheads should be individually referenced and expressly safeguarded. Notably under the heading of 'Implementation – T1.1' reference is made to the fact that "mapping of transport infrastructure is available on the Council's website and on the	This wording change has been made. Please see the new wording in Policy T1 Strategic Transport that supports the safeguarding of strategic rail heads.

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										Policies Map". Notably this is not the case for the 'safeguarded railhead' it is only identified as SIL.	
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/016	Transport	T1 Strategic transport			T1.1			<p>Draft Policy T1 should be amended to specifically include reference to 'Safeguarded Rail Freight Sites'. It is suggested this could be worded/included as follows (suggested additions shown in red and underlined):</p> <ol style="list-style-type: none"> <li>1. Development will be required to protect and enhance the strategic transport network through: <ol style="list-style-type: none"> <li>a. Ensuring that it will not...</li> <li>b. Protecting the ongoing function and provision of strategic transport infrastructure such as: <ol style="list-style-type: none"> <li>i. Radar...</li> <li>ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots</li> <li>iii. <u>Safeguarded Rail Freight Sites and their access requirements</u></li> <li>iv. Buses – priority..</li> <li>v. Protected mooring...</li> <li>vi. Safeguarded wharves and their access requirements....</li> <li>vii. London City.....</li> </ol> </li> </ol> </li> </ol> <p>In line with the 'Implementation' requirements the Bow East Goods Yard should be identified on the Policies Map as a 'Safeguarded Rail Freight Site'.</p>	This wording change has been made. Please see the new wording in Policy T1 Strategic Transport that supports the safeguarding of strategic rail heads.

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Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/020	Transport	T1 Strategic transport						Identification of Bow Goods Yard as SIL is fully supported as are references to 'safeguarded railhead' both in the Employment Policy J1 and N8.SA9 Site Allocation policy for Pudding Mill. However, the site additionally, critically, and in line with National and London Plan requirements needs to be expressly identified as a 'Safeguarded Rail Freight Site' both on the Policies Map and within a specific Local Plan Policy (T1).	This wording change has been made. Please see the new wording in Policy T1 Strategic Transport that supports the safeguarding of strategic rail heads.
Reg18-E-146	LBN - Public Health	Reg18-E-146/076	Transport	T1 Strategic transport			T1.2 .a			[a. unlock growth, increase public transport mode share, ] and walking and cycling (by making it easy to make trips to and from stations / stops on foot or cycle)	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/097	Transport	T1 Strategic transport						T1 should mention active travel!	Comment noted. Policy T1 focuses on strategic transport, active travel is contained within other transport policies.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/141	Transport	T1 Strategic transport						Major transport. Developers need to deliver improvements - Showcase	Comment noted. The Sustainable Transport Strategy outlines how improvements to public transport and new strategic public transport infrastructure will be delivered, working with TfL. The Local Plan supports this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/142	Transport	T1 Strategic transport						Major transport. Developers need to deliver improvements - Plaistow Place (no link to Greenway)	The Sustainable Transport Strategy outlines how new connections to the Greenway will be improved access for better walking and cycling. The Local Plan will support this through new development.

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/143	Transport	T1 Strategic transport						Support strategic transport - no escape for developers!	Support noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/144	Transport	T1 Strategic transport						T1 - strategic cycling routes. TfL strategic routes - future routes. Major connections	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/145	Transport	T1 Strategic transport						[Cycling routes] Network of potential routes - Leisure Parks Greenway	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/146	Transport	T1 Strategic transport						[Cycling routes] [Network of potential routes] Roding Green N-S link connection	Comment noted. The Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, such as the River Roding Way.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/147	Transport	T1 Strategic transport						[Cycling routes] [Network of potential routes] Leaway - walking and cycling. Attractive for residents. One of best LAs for this.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.

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Reg18-E-057	London City Airport	Reg18-E-057/024	Transport	T1 Strategic transport						<p><i>Policy T1: Strategic Transport</i></p> <p>We are generally supportive of the approach to policy T1, particularly its acknowledgement of LCY as part of the strategy transport network and the requirement for developers to protect the ongoing function of the airport and its Public Safety Zones.</p>	Support noted.
Reg18-E-057	London City Airport	Reg18-E-057/025	Transport	T1 Strategic transport					T1.1	<p>We are also supportive of the approach to implementation that advises developers to discuss proposals with the airport at the earliest possible stage.</p>	Support noted.

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Reg18-E-057	London City Airport	Reg18-E-057/026	Transport	T1 Strategic transport					T1.1	We suggest that specific reference is also made to the Aerodrome Safeguarding requirements which are different from the Public Safety Zones. Suggested text is provided in the Annex.	This wording change has been made. Please see the new wording in Policy T1.

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Reg18-E-057	London City Airport	Reg18-E-057/051	Transport	T1 Strategic transport			T1.1 .b			[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES] <ul style="list-style-type: none"> <li>• Page/Policy: T1: Strategic Transport, P262</li> <li>• Current Wording: 1. Development will be required to protect and enhance the strategic transport network through: ... b. Protecting the ongoing function and provision of strategic transport infrastructure such as: ... vi. London City Airport and the Public Safety Zone</li> <li>• Commentary: The text should also include reference to Aerodrome safeguarding.</li> <li>• Suggested Change: <b>Change part vi to: vi. the Public Safety Zones and Aerodrome Safeguarding requirements of London City Airport.</b></li> </ul>	This wording change has been made. Please see the new wording in Policy T1.
Reg18-E-059	Newham Cyclists	Reg18-E-059/001	Transport	T1 Strategic transport						NC welcome the plan for a 'vigilance/due diligence' pre-assessment process for all new LB Newham developments with regards to the potential to compromise or create severance to future strategic transport schemes especially 'Active Travel mode' ones.	Support noted.
Reg18-E-059	Newham Cyclists	Reg18-E-059/002	Transport	T1 Strategic transport						NC will also recommend this been done in conjunction with a statutory requirement to create a local development Travel/Transport Plan with 'Active Travel' as the centre piece of such plan	Comment noted. The Sustainable Transport Strategy provides a strategic transport plan for Newham, including cycling and walking to deliver modal shift.
Reg18-E-059	Newham Cyclists	Reg18-E-059/003	Transport	T1 Strategic transport						The principles of 'Low Traffic Neighbourhoods' should be incorporated into the conceptual design at the onset and not an 'after thought' process.	Comment noted, Policy T2 outlines that the design of a scheme should prioritise walking, cycling and public transport, and discourage vehicle use.
Reg18-E-059	Newham Cyclists	Reg18-E-059/004	Transport	T1 Strategic transport						NC also welcome the requirements the 'proposals for new strategictransport schemes must' meet.	Support noted.



Reg18-E-073	Notting Hill Genesis	Reg18-E-073/005	Transport	T1 Strategic transport						<p>[However, there has been significant regeneration in the local area, creating over 1,800 new homes and jobs at Royal Albert Wharf, Gallions Quarter and Albert Island, resulting in unsustainable pressure on Gallions Reach DLR station.] As such, it is considered the existing Gallions Reach DLR station should be improved to facilitate need.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as the Sustainable Transport Strategy considers necessary interventions to public transport as a consequence of development, including at DLR stations such as Gallions Reach.</p>
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Reg18-E-033	Port of London Authority	Reg18-E-033/006	Transport	T1 Strategic transport						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 see the new wording in Justification T1
Reg18-E-033	Port of London Authority	Reg18-E-033/030	Transport	T1 Strategic transport			T1.1 b			In principle welcome the continued reference in the policy and associated policies map to the need to protect the ongoing function of: - Radar stations and sightlines; - Protected mooring points and public river access points; and - Safeguarded wharves and their access requirements.	Support noted.
Reg18-E-033	Port of London Authority	Reg18-E-033/031	Transport	T1 Strategic transport					T1.1	Also welcome that the need to consult the PLA with regard to any development that may impact the strategic transport infrastructure is specifically referenced in the supporting text.	Support noted.

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Reg18-E-033	Port of London Authority	Reg18-E-033/032	Transport	T1 Strategic transport						However it is considered that the public river access points should be expanded to specifically give reference to the riverbus services in the borough, of which there is one existing facility located at Royal Wharf, and potential new riverbus services in the Albert Island development area (planning permission: 20/00051/FUL) and Beckton Riverside.	This wording change has been made. Please see the new wording in Policy T1.
Reg18-E-033	Port of London Authority	Reg18-E-033/033	Transport	T1 Strategic transport						Support the reference to the potential DLR extension to/from Beckton Riverside and Thamesmead. To confirm the PLA must be consulted on the development of the proposed extension at an early stage.	Support noted.
Reg18-E-002	Resident	Reg18-E-002/034	Transport	T1 Strategic transport						there are shortcomings and one of the most disappointing is the pollution caused by air traffic not being addressed, except to be against the Silvertown tunnel plans (I agree and gave my opinion some years ago on this)	Comment noted.
Reg18-E-098	Resident	Reg18-E-098/064	Transport	T1 Strategic transport						6 Transport The introduction of Rapid Transit systems such as guided busways have been successful in recent years . • ( <a href="https://discovery.ucl.ac.uk/id/eprint/1476446/1/B66%20CGB%20Full%20Report.pdf">https://discovery.ucl.ac.uk/id/eprint/1476446/1/B66%20CGB%20Full%20Report.pdf</a> <a href="https://journals.sagepub.com/doi/abs/10.1177/03611981221085532">https://journals.sagepub.com/doi/abs/10.1177/03611981221085532</a> <a href="https://www.wri.org/insights/4-ways-cities-benefit-bus-rapid-transit-brt">https://www.wri.org/insights/4-ways-cities-benefit-bus-rapid-transit-brt</a>	Comment noted.

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Reg18-E-098	Resident	Reg18-E-098/065	Transport	T1 Strategic transport						The DLR has its origins as a small scale light rail network connecting the City and Docklands. It now has expanded platforms, extra carriages and additional spurs added to its network. Despite those capacity expansions, and because vast development has taken place around its network it already runs at capacity. The DLR is an inappropriate hook on which to place transport investment.	Comment noted. TfL are comprehensively upgrading the DLR with new trains and signalling, in light of the proposed development in east London.

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Reg18-E-098	Resident	Reg18-E-098/066	Transport	T1 Strategic transport						This area of East London now requires a 21 <sup>st</sup> century infrastructure to bring about a truly sustainable transport system. That requires reliable rapid transit separate to the exhausted DLR network and one which will also link with the Elizabeth line at Stratford Canary Wharf and potentially Woolwich/Abbey Wood.	Comment noted. TfL are comprehensively upgrading the DLR with new trains and signalling, in light of the proposed development in east London.
Reg18-E-098	Resident	Reg18-E-098/067	Transport	T1 Strategic transport						Whilst some further improvements and expansion to the DLR may be the most appropriate policy in specific locations, the DP should be amended so that where "extension to the DLR" is mentioned the following words should be added "or an alternative new rapid transit system for outer East/South East London".	This wording change has not been made. We did not consider this change to be necessary, as TfL consider the DLR the most appropriate mode of transport to serve Beckton Riverside and Thamesmead

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Reg18-T-026	Resident	Reg18-T-026/022	Transport	T1 Strategic transport						Romford Road from Manor park to Ilford should have a lot more green spaces and trees.	Comment noted. As part of the Romford Road Active Travel scheme being delivered by the Sustainable Transport and Highways team, new trees and planters will be installed along Romford Road.
Reg18-T-026	Resident	Reg18-T-026/024	Transport	T1 Strategic transport						Make polluters pay higher business rates.	Comment noted. The Council does not control the level of business rates that are paid.
Reg18-T-026	Resident	Reg18-T-026/025	Transport	T1 Strategic transport						Car wash shops polluting the street should be paying fines until they fix their problem.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the environmental health department are able to help. We have also provided them with your comments.
Reg18-T-043	Resident	Reg18-T-043/009	Transport	T1 Strategic transport						[Add to it] While there is a very good connection to the London center via underground and DLR	Comment noted.
Reg18-T-126	Resident	Reg18-T-126/025	Transport	T1 Strategic transport						[Keep it]	Support noted.

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Reg18-T-019	Resident	Reg18-T-019/020	Transport	T1 Strategic transport						[Add to it] Need more information	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No changes/additions have been made.

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Reg18-T-034	Resident	Reg18-T-034/049	Transport	T1 Strategic transport						Limit tall buildings in local areas, town centres and along high roads as this impacts pedestrians and cyclists.	Comment noted. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3. The policy is clear that development proposal for tall buildings are required to address the criteria set by London Plan (2021) Policy D9 section C, including visual, environmental and cumulative impact and to demonstrate them in a tall building section of the Design Access Statement. Furthermore, to stress the importance of wind assessment in high streets and town centres, a wording change has been made. Please see the new wording in implementation text D4.3.
Reg18-T-045	Resident	Reg18-T-045/009	Transport	T1 Strategic transport						Better public transport.	Comment noted. The Sustainable Transport Strategy outlines how public transport will be improved across the borough. The Local Plan will support this through new development.
Reg18-T-045	Resident	Reg18-T-045/010	Transport	T1 Strategic transport						No cycle lanes between bus stop and bus.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-T-045	Resident	Reg18-T-045/011	Transport	T1 Strategic transport						Discourage driving.	Support noted. Local Plan policy seeks to reduce car dominance and dependence, in favour of walking, cycling and public transport.
Reg18-T-057	Resident	Reg18-T-057/040	Transport	T1 Strategic transport						H	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan.
Reg18-T-058	Resident	Reg18-T-058/036	Transport	T1 Strategic transport						[Originally made under T1] Firstly I am concerned about the Air pollution,	Comment noted, air quality is addressed throughout the Local Plan, including by reducing car dominance and dependence, in favour of walking, cycling and public transport.



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Reg18-T-058	Resident	Reg18-T-058/037	Transport	T1 Strategic transport						buildings in Newham should have greenery at the top of the building such as trees, and plants and follow the Singapore way	A change to this policy approach has not been made. Local Plan policy supports increased biodiversity, as well as green roofs.
Reg18-T-072	Resident	Reg18-T-072/019	Transport	T1 Strategic transport						[Add to it] Please ensure all transport are fully integrated and operate efficiently to ensure people are able to get to work early in the mornings or late at night. Many people work shift hours and need access to safe transport home and to work. Many are travelling alone and need to feel safe.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-078	Resident	Reg18-T-078/001	Transport	T1 Strategic transport						[Add to it] DLR EXTENSION TO THAMESMEAD SHOULD ALSO GOTO ABBEY WOOD OR BELVEDERE	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-078	Resident	Reg18-T-078/002	Transport	T1 Strategic transport						[Originally submitted under T2] [Add to it] DLR EXTENSION should go to abbey wood and belvedere	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-078	Resident	Reg18-T-078/006	Transport	T1 Strategic transport						[Please share any feedback you have with us.] DLR should go to abbey wood	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-080	Resident	Reg18-T-080/001	Transport	T1 Strategic transport						[Keep it] Love the plans for the DLR to extend to thamesmead, it will provide great links to the other side of the river. Make sure it happens sooner than later	Support noted.
Reg18-T-098	Resident	Reg18-T-098/018	Transport	T1 Strategic transport						Improve safety and look and promote Greenway;	Comment noted. The Sustainable Transport Strategy outlines how the Greenway will be improved to allow for better walking and cycling. The Local Plan will support this through new development.

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Reg18-T-109	Resident	Reg18-T-109/060	Transport	T1 Strategic transport						not everyone wants the silver town tunnel thanks to Sadiq who is despised in Newham sadly	Comment noted.
Reg18-T-120	Resident	Reg18-T-120/001	Transport	T1 Strategic transport						[Add to it] Given Connaught Riverside is being planned to have more residents, the Council should engage with TfL and GLA to explore the feasibility of a new DLR stop and Elizabeth line stop nearby. This will at least allow sites to be identified and reserved for future even if construction may not be able to start immediately.	Comment noted. The Sustainable Transport Strategy considers future requirements for public transport, including the level of interventions required as a consequence of new development.
Reg18-E-092	Royal Docks	Reg18-E-092/029	Transport	T1 Strategic transport						Transport • T1 – we would suggest here that the Plan sets out the potential to work with TfL and DLR to increase the hours of operation of the DLR, particularly in the Royal Docks. This will support shift works who need to arrive and leave work outside of the hours of operation of the DLR. It will enable them to make sustainable transport choices.	This wording change has not been made. We did not consider this change to be necessary as the Sustainable Transport Strategy considers improvements to public transport in the borough - including longer hours of operation and improved public transport for shift workers generally.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/159	Transport	T1 Strategic transport						At a strategic level the Berkeley Group is supportive of new strategic transport projects and agree that new strategic transport has the potential to unlock significant development opportunity that can deliver substantial economic, social and environmental benefits for the borough.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/019	Transport	T1 Strategic transport						We welcome the approach of this policy which is broadly in accordance with London Plan Policy T3.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/020	Transport	T1 Strategic transport			1.b.i ii			It would be helpful if part 1.b.iii. were expressed as 'Buses—priority measures, stops, stands (including drivers' facilities), stations and garages and bus depots'. This is clearer than the existing reference to bus depots and includes street infrastructure	This wording change has been made. Please see the new wording in Policy T1.

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										that may need protection from the impacts of development.	
Reg18-E-095	Transport for London	Reg18-E-095/021	Transport	T1 Strategic transport					T.1.1	This point should also be reflected in T1.1 Implementation under point 4 – Buses. [see comment Reg18-E-095/020]	This wording change has been made. Please see the new wording in Policy T1.
Reg18-E-095	Transport for London	Reg18-E-095/022	Transport	T1 Strategic transport					T.1.1	It would be helpful if section T1.1 could also refer to projects and interventions that support delivery of TfL's Bus Action Plan	This wording change has not been made. We did not consider this change to be appropriate as these projects and interventions would not be strategic transport - they are better considered in T2.
Reg18-E-095	Transport for London	Reg18-E-095/023	Transport	T1 Strategic transport					T.1.2	We suggest that the word 'negatively' is inserted at the end of the third sentence in T1.1. Alternative wording could be ' <u>should demonstrate that negative impacts on the strategic transport infrastructure are minimised.</u> '	This wording change has been made. Please see the new wording in Implementation T1.
Reg18-E-095	Transport for London	Reg18-E-095/024	Transport	T1 Strategic transport			2.a.ii			In part 2.a. it should be clarified that strategic transport schemes should be designed to 'increase public transport mode share <u>and active travel</u> ' because some major improvements may be aimed primarily at increasing cycling and walking.	This wording change has been made. Please see the new wording in Policy T1.
Reg18-E-095	Transport for London	Reg18-E-095/025	Transport	T1 Strategic transport						We welcome the reference to planning obligations being used to deliver strategic transport improvements, although this may be better included as part of the core policy.	Comment noted.
Reg18-E-095	Transport for London	Reg18-E-095/026	Transport	T1 Strategic transport						Reference to step-free access at existing/new infrastructure would be welcomed, although this will need to be funded through planning obligations or other funding sources because TfL is not able to commit funding at the current time.	Comment noted.

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Reg18-E-095	Transport for London	Reg18-E-095/027	Transport	T1 Strategic transport				3.25 2		We welcome the support expressed in paragraphs 3.252–3.254 for a potential DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford station and the intention to protect land and access to ensure delivery of the projects.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/028	Transport	T1 Strategic transport				3.25 2		Mention could also be made of other potential new/improved stations linked to development proposals.	Comment noted.
Reg18-E-095	Transport for London	Reg18-E-095/029	Transport	T1 Strategic transport						Support for these projects [DLR extension and Stratford Station] could be made stronger by referencing them in policy T1.	This wording change has been made. Please see the new wording in Justification T1.
Reg18-E-095	Transport for London	Reg18-E-095/030	Transport	T1 Strategic transport				3.25 2		The justification text in 3.252 outlines some of the benefits associated with these projects but it could also refer to unlocking and supporting growth. The justification text could also outline the role in which strategic transport provision enables better planning for wider and more local transport such as good interchanges with other public transport (including buses and cycling). This could also refer to TfL's Interchange Best Practice Guidelines.	This wording change has been made. Please see the new wording in Justification T1.
Reg18-E-095	Transport for London	Reg18-E-095/031	Transport	T1 Strategic transport					T1.1	The reference to safeguarded land, as well as its potential release where appropriate, is welcomed. This should be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. It would be helpful in the Implementation section to refer to the LPG as it provides guidance on protecting transport infrastructure.	This wording change has been made. Please see the new wording in Implementation T1.
Reg18-E-095	Transport for London	Reg18-E-095/032	Transport	T1 Strategic transport					Monitoring	Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.	Comment noted. This wording change has been made. Please see the new wording throughout the transport policies.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-059	Travels in borough daily	Reg18-T-059/003	Transport	T1 Strategic transport						[Add to it] The bus lanes on Barking Road are not fit for purpose. The roundabout with the A406 is always queuing. This means that I avoid taking the bus, even though when running smoothly, it is the most efficient way to travel.	Comment noted. The Sustainable Transport Strategy has considered ways to improve the bus network in Newham, including additional bus priority and reducing the number of private cars on the road. It should be noted that TfL control the provision of bus services in the borough.
Reg18-T-059	Travels in borough daily	Reg18-T-059/004	Transport	T1 Strategic transport						[Add to it] I think there needs to be a boroughwide bus study and review particularly of the A406 roundabout	Comment noted. The Sustainable Transport Strategy has considered ways to improve the bus network in Newham, noting that TfL control the provision of bus services in the borough.
Reg18-E-127	West Ham United FC	Reg18-E-127/006	Transport	T1 Strategic transport				Also 2.3.5		<p>It is noted at para 2.3.5 and page 262 that there are plans to uplift the capacity of the Jubilee Line by 25% 'which would benefit the growth areas around Stratford and Canning Town' as well as the Olympic Legacy and Policy BFN1 notes, under N8 Stratford and Maryland, that development will be supported by a redesigned Stratford Station. This development is anticipated to include 47,000 new homes, 90,000sqm of office space, 335,000sqm of industrial development and 26k sqm of retail. The Plan says the improvements to Stratford Station 'may require funds from development which impact on the station', as well as wayfinding, cycle hire and local transport improvements. The Club already works closely with the Council on local transport improvements and has contributed to delivering these.</p> <p>We suggest that the former Olympic Stadium and its environs should be identified as both a use which should be embraced as a key legacy and prioritised when future public transport capacity is being considered and that <b>its role in further</b></p>	Comment noted. The Sustainable Transport Strategy sets out the transport interventions required to support the growth planned across the borough.

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										assisting with the sustainable regeneration of the area is recognised.	
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/006	Transport	T2 Local transport						With regard to cycling infrastructure, LBBD note whilst improved connections are suggested, there are also additional placemaking and cycling opportunities that could further strengthen these links.	Comment noted. The Sustainable Transport Strategy considers how transport infrastructure will support the level of growth in the borough, and what interventions are required to support this.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/007	Transport	T2 Local transport						We would like to work with you to see how such connections could be make better between our two boroughs	Comment noted.
Reg18-E-040	CPRE	Reg18-E-040/032	Transport	T2 Local transport						Local transport strategy policy T2 should limit main roads to one lane only, for general traffic, to support delivery of the Mayor's Transport Strategy targets and reduce the negative impact of roads in terms of severance and health.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).
Reg18-E-040	CPRE	Reg18-E-040/033	Transport	T2 Local transport						[limit roads to one lane only] Remaining space should be re-allocated for bus or cycle lanes	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including for other uses.)

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Reg18-E-040	CPRE	Reg18-E-040/034	Transport	T2 Local transport						[limit roads to one lane only] Remaining space should be re-allocated for wider pavements	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including for wider pavements).
Reg18-E-040	CPRE	Reg18-E-040/035	Transport	T2 Local transport						[limit roads to one lane only] Remaining space should be re-allocated for SUDS / trees etc	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).
Reg18-E-040	CPRE	Reg18-E-040/036	Transport	T2 Local transport						[limit roads to one lane only] Remaining space should be re-allocated for or in certain circumstances, even built development	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including for wider pavements).
Reg18-E-040	CPRE	Reg18-E-040/037	Transport	T2 Local transport						[limit roads to one lane only] Specifically: • Armada Way roads/roundabouts + Gallions Reach roads should be reconfigured	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including for wider pavements).
Reg18-E-040	CPRE	Reg18-E-040/038	Transport	T2 Local transport						[limit roads to one lane only] Specifically: • The A1020 / A112 / Connaught Bridge road and roundabout layouts are excessively large in many places and could be reduced to one lane only in either direction (or one lane plus bus lanes or cycle lanes) and remaining space returned to green space or used for much needed housing.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).
Reg18-E-040	CPRE	Reg18-E-040/039	Transport	T2 Local transport						[limit roads to one lane only] Specifically: • High Street / A11 should be reconfigured to reduce the impact and reallocate space for sustainable transport and SUDS etc. (Also the roundabout at Rick Roberts Way.)	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).
Reg18-E-040	CPRE	Reg18-E-040/040	Transport	T2 Local transport						[limit roads to one lane only] Specifically: • Newham Way / A13 – This should be allocated for reconfiguration in association with relevant agencies to reduce the impact of the road on surrounding neighbourhoods and reallocate space to sustainable transport / SUDS etc.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).

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Reg18-E-040	CPRE	Reg18-E-040/041	Transport	T2 Local transport						[limit roads to one lane only] Specifically: • Monfichet Road / Westfield Avenue – and other roads in this area should be narrowed for general cars and reallocated for with bus / emergency lanes / SUDS etc.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking and greenery).
Reg18-E-040	CPRE	Reg18-E-040/083	Transport	T2 Local transport						West Ham station should be expanded / re-developed to cope with the likely extra volumes; the station is already struggling to cope with through traffic and is often an unpleasant environment	Comment noted. The Sustainable Transport Strategy notes that several stations in the borough – Stratford, Canning Town and West Ham – have capacity issues. The Council will work closely with TfL and other stakeholders to improve these stations.  The Council will also work with TfL and developers to understand the impact of development on other stations in the borough– such as Pontoon Dock and West Silvertown.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/091	Transport	T2 Local transport						For instance, in the context of Low Traffic Neighbourhoods (LTNs), the document fails to mention that the mechanism to realise legal implementation is underpinned by road traffic legislation and traffic orders rather than planning legislation. Incidentally, the proposals for LTNs outlined in the Draft Plan do not present any evidence of a meaningful community consultation having been undertaken. Residential streets are an important asset for those who live on them and can have a major influence on their quality of life. As a result, it is critical that there is a co-designed and meaningful approach with the community rather than what is deemed the imposition of schemes which needs to be addressed in the appropriate platform and not in the local development plan.	Comment noted. The introduction of Low Traffic Neighbourhoods (LTNs) to existing streets is the responsibility of the highways authority. However, LTN principles (such as reducing through vehicle traffic, while encouraging permeability by pedestrians and cyclists) are a key part of design in new developments. The Local Plan encourages co-design of developments, including the delivery of key walking and cycling connections within the site and to and from key local facilities, as well as the layout of the site. Planning colleagues also work with highways colleagues to ensure that new developments do not conflict with the delivery and operation of newly-created LTNs.  With regards to consultation of LTNs, consideration of an LTN in the borough involves



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											<p>extensive data collection and consideration of feedback from local residents and businesses. The Council also consults with statutory stakeholders (London Ambulance Service, Met Police, London Fire Brigade and others). If the Council decides to proceed with an experimental scheme, we install temporary modal filters. During this stage, we gather traffic and air quality data to measure the impact of the low traffic neighbourhood. We also collect feedback to help us decide whether or not to make the scheme permanent. More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/185	Transport	T2 Local transport						Environment - reduce through traffic	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.
Reg18-E-130	Hadley Property Group	Reg18-E-130/150	Transport	T2 Local transport						Hadley supports the vision for 15-minute neighbourhoods in Newham and the need for developments to support this	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/151	Transport	T2 Local transport						Hadley is developing exemplary sustainable development proposals on the sites which are in line with this vision.	Comment noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/152	Transport	T2 Local transport			T2.2			It is supportive of the need for major development proposals to provide or contribute towards wayfinding and cycle hire provision	Support noted.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/153	Transport	T2 Local transport					T2.2b	Hadley suggests that this policy should make clear that if cycle hire provision is provided on site or by the applicant, a contribution to cycle hire elsewhere will not be needed	This wording change has not been made. We did not consider this change to be appropriate, as we understand the wording to be clear.
Reg18-E-146	LBN - Public Health	Reg18-E-146/077	Transport	T2 Local transport			T2.1			[. This will be achieved through:] consider making it more explicit about connectivity from the development to surrounding areas and routes through the development	This wording change has not been made. We did not consider this necessary, as this is part of the Healthy Streets principles.
Reg18-E-146	LBN - Public Health	Reg18-E-146/078	Transport	T2 Local transport			T2.1 .b.			[b. Supporting the delivery of the Walking and Cycling Strategies.] can we say include providing public cycle parking - not just for residents in the development?	Comment noted. Both the Local Plan and the Sustainable Transport Strategy support increased provision of publicly accessible cycle parking.
Reg18-E-146	LBN - Public Health	Reg18-E-146/079	Transport	T2 Local transport			T2.1 .c.			[c. Supporting or delivering local public transport improvements, depending on the nature of the development and the nature of intervention.] including improvements in the areas around the development as well as on the development itself	This wording change has not been made. This was not considered appropriate, as this would depend on the level of development.
Reg18-E-146	LBN - Public Health	Reg18-E-146/080	Transport	T2 Local transport			T2.2 .b.			[b. Cycle Hire provision. This could include the provision of a cycle hire dock on the applicant's land.] that is open to the public - not restricted to people living on the development	This wording change has been made, to make clear that the cycle hire should be publicly accessible. Please see the new wording in Policy T2.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/086	Transport	T2 Local transport			T2.2 .b			Lime bikes/Santander?	The Sustainable Transport Strategy outlines how cycle hire will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/096	Transport	T2 Local transport						Support for Roding Corridor link	Comment noted. The Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, such as the River Roding Way.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/098	Transport	T2 Local transport						Fragemented cycle strategy - lack of will - investment	Comment noted. The Sustainable Transport Strategy sets out a strategy for cycling in the borough, including new cycle lanes, improved cycle parking and cycle hire. The Local Plan supports the strategy through new development.

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/109	Transport	T2 Local transport						Six year old to cycle on our streets. Safe!	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/113	Transport	T2 Local transport			T2.2			T2.2 - improve infrastructure	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/115	Transport	T2 Local transport						Cargo bikes - not ridden but carry trailer. More squeezes for road space than regular bike	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/118	Transport	T2 Local transport						Biggest issue - walking/cycling	Comment noted. The Sustainable Transport Strategy outlines how new, high quality walking and cycling routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/119	Transport	T2 Local transport						More/some segregated cycle lanes (north-south)	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/127	Transport	T2 Local transport						Substantial width of cycle lanes for cargo bikes	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/128	Transport	T2 Local transport						[Substantial width of cycle lanes for cargo bikes] Yes.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The

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											Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/129	Transport	T2 Local transport						Cycle lanes which do not disappear every 30 yards.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/153	Transport	T2 Local transport						LTN - Woodgrange Easte Capel Road Whatsapp Group - positive about LTNs	Comment noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/154	Transport	T2 Local transport						LTN - disabilities adjusting to new normal. Unreasonable journeys - too long? Adjust/adapt to new normal	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property.</p> <p>Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/170	Transport	T2 Local transport						More cycle lanes needs	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-E-016	National Highways	Reg18-E-016/003	Transport	T2 Local transport						National Highways are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/010	Transport	T2 Local transport						There are policies in the London Plan that echo this approach, notably Policy T4 Assessing and mitigating transport impacts. It says; A. Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. B. When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at	Comment noted.

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										the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.	
Reg18-E-016	National Highways	Reg18-E-016/011	Transport	T2 Local transport						The Policy continues but within [London Plan Policy T4] para B there is reference fully assessing impacts at strategic level. Also, we would echo that any proposed development capable of presenting an impact on our network should be accompanied by a robust transport assessment or similar	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/012	Transport	T2 Local transport						We will consider the impact of a development proposal on our network at the time of application submission but we also welcome opportunities for early pre-application engagement or earlier through the production of the Local Plan.	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/013	Transport	T2 Local transport						Based on the above, we draw your attention to Paragraph 51 of the Circular 1/22 which notes where a transport assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary. Should any impact on the SRN be identified, National Highways will seek to use	Comment noted.

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										Grampian conditions to limit development prior to SRN improvement schemes being in place.	
Reg18-E-059	Newham Cyclists	Reg18-E-059/005	Transport	T2 Local transport						The proposed TfL Strategic Cycle Analysis (SCA) or Cycle Future Routes (CFR) schemes located in the LB Newham area should also be a priority and should not be compromised e.g. by bus priority plans.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-E-033	Port of London Authority	Reg18-E-033/034	Transport	T2 Local transport			T2.3			Support in principle part 3 of policy T2 with regard to the borough supporting development that supports new transportation technology.	Support noted.
Reg18-E-033	Port of London Authority	Reg18-E-033/035	Transport	T2 Local transport				3.260		To strengthen this supporting paragraph 3.260 should be expanded to promote the potential for the increased use of the tidal Thames as part of last mile delivery and light freight deliveries, to help reduce road movements in the borough. This would be supported by the PLA's Thames Vision 2050 plan, which includes the aim that the tidal Thames will become integral to light freight logistics and last mile delivery to supply London	This wording change has been made. Please see the new wording in Justification T4.
Reg18-E-027	Resident	Reg18-E-027/034	Transport	T2 Local transport						I strongly support LTNS, even though I live on a main road, so the local LTNS did not benefit me directly immediately – in fact, traffic on my road increased a bit initially after the LTN. But I think the main purpose of LTNS should be to reduce the amount of carbon emissions in the overall area, so I strongly support LTNS.	Support noted. More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a>

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Reg18-E-002	Resident	Reg18-E-002/042	Transport	T2 Local transport						I would encourage the Thames Path in this borough to properly be along the Thames, as currently industries are hogging it.	A change to the policy approach has not been made, as we have allocated areas of the river for industrial use. The Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, such as the Thames Path. In some areas of the borough, the path may not be able to follow the river, given the heavy industry present.
Reg18-E-002	Resident	Reg18-E-002/043	Transport	T2 Local transport						As also the path that could go from Cody Dock to Canning town (to then hook up with Thames path hopefully) is being blocked by businesses currently	Comment noted. The Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, such as the Leaway.
Reg18-T-043	Resident	Reg18-T-043/010	Transport	T2 Local transport						[Add to it] there is suprisingly 0 busses going to e.g. Trafalgar Square from the Canning Town bus station. Literarily 0. The closest bus going into London center is 20 minutes away from the Canning Town bus station.	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-095	Resident	Reg18-T-095/002	Transport	T2 Local transport						[Add to it] Please look into current bus shelters and their proximity to households, thus impacting negatively on residents. Bus shelters should be placed in areas where there is adequate space according to TFL guidelines.	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus shelters in Newham.
Reg18-T-121	Resident	Reg18-T-121/001	Transport	T2 Local transport			T3.3			[Add to it] Ensure the cycle infrastructure facilitates effortless travel without the need for frequent stopping and starting which is very tiring on a bike such as sharp bends and speed bumps	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-T-126	Resident	Reg18-T-126/026	Transport	T2 Local transport						[Keep it]	Support noted.
Reg18-T-002	Resident	Reg18-T-002/075	Transport	T2 Local transport						[Change it] Cycle lanes can only change behaviour if they are real segregated lanes. If they are not, they will not work.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.



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Reg18-T-002	Resident	Reg18-T-002/076	Transport	T2 Local transport						[Change it] Most of Newham's cycle lanes are not segregated and are regarded by most as unsafe and more dangerous than not using them.	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-T-018	Resident	Reg18-T-018/013	Transport	T2 Local transport						Keep it clean	Unfortunately it was not clear what change you wanted to make to this part of the Plan.
Reg18-T-019	Resident	Reg18-T-019/021	Transport	T2 Local transport						[Add to it] Need more information	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-068	Resident	Reg18-T-068/001	Transport	T2 Local transport						[Add to it] There is no mention of the limited public transport available for travelling from North to South - bus routes are few and very slow. This is a disincentive for people not to use their cars .	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-068	Resident	Reg18-T-068/002	Transport	T2 Local transport						[Add to it] Also I think it unrealistic for businesses / trades people to not use vehicles - the notion of everyone can use cargo bikes is ludicrous. There should not be obstacles put in their way - it doesn't help anybody	A change to this policy approach has not been made. Local Plan policy also seeks to reduce car dominance and dependence, in favour of walking, cycling and public transport. It does not ban or prevent access to properties by cars or vans. Evidence shows that many businesses and tradesperson use cargo bikes in London.
Reg18-T-072	Resident	Reg18-T-072/020	Transport	T2 Local transport						[Add to it] Safe and reliable transportation important for local workforce	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-072	Resident	Reg18-T-072/021	Transport	T2 Local transport						[Add to it] Safe and reliable transportation important for [local workforce] and people travelling alone.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.

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Reg18-T-073	Resident	Reg18-T-073/004	Transport	T2 Local transport						[Add to it] I didn't read this in detail, but would advocate for there to be a bus route through the Burges Estate area in East Ham, which scores 0-1 on public transport access.	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-086	Resident	Reg18-T-086/008	Transport	T2 Local transport						[Keep it] How about a Newham only pass	Unfortunately it was not clear what change or addition [delete as appropriate] you wanted to make to this part of the Plan.
Reg18-T-088	Resident	Reg18-T-088/024	Transport	T2 Local transport						[Change it] there are in few routes still running single buses (i meant not double decker) like 376, 325... in the morning and evening what I noticed because kids and other people both have to go in school and offices but single buses fully packs and sometimes driver left passengers (this is not driver fault either). I would like to request and suggest in the morning and evening time should be Mayor should provide double decker for these buses and same as like other areas as well or single buses should be stop permanently because newham population increasing day by day.	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-096	Resident	Reg18-T-096/007	Transport	T2 Local transport						[Add to it] Change a few things	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-098	Resident	Reg18-T-098/019	Transport	T2 Local transport						better connect Eastham/Upton Park with Stratford;	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-098	Resident	Reg18-T-098/020	Transport	T2 Local transport						buses take long considering short distance;	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.
Reg18-T-102	Resident	Reg18-T-102/006	Transport	T2 Local transport						[Keep it] Not enough transport facilities for special needs school children	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-115	Resident	Reg18-T-115/005	Transport	T2 Local transport			T2.1		<p>[Change it] Policies regarding LTNs should reflect air quality and open space accessibility. Publicly available data on air quality shows how the Green Street East and West wards suffer from significantly higher levels of NO2 and PM 10 particulate pollution compared to wards to the north which benefit from, or are planned to benefit from, LTNs.</p> <p>Similarly, these ward suffer from the lowest levels of access to open space, as defined by the GLA, in the borough.</p> <p>The implementation of LTNs in the borough does not follow an evidence-based approach addressing areas with the highest levels of need and instead follows established patterns of inequality. Rather than improving living conditions for those areas that need it most they are driving gentrification and exacerbating inequality.</p>	Comment noted. The Sustainable Transport Strategy considers how LTNs can be rolled out comprehensively across the borough, noting public consultation and trials of the schemes.	
Reg18-E-092	Royal Docks	Reg18-E-092/030	Transport	T2 Local transport					<p>T2 – we would suggest that, given the current extent of the TfL Cycle Hire scheme, that where contributions are sought from developers, they should be applied either to the TfL Cycle Hire scheme or, where there is no imminent proposed expansion of the network, to alternative providers. This is to ensure that active travel options exist when developments are built.</p>	Comment noted. The Sustainable Transport Strategy sets out Newham's approach to Cycle Hire, including the potential expansion of the TfL Cycle Hire scheme in future.	

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Reg18-E-017	Rt Hon Sir Stephen Timms MP	Reg18-E-017/004	Transport	T2 Local transport						There is a long strip of Metropolitan Open Land running in Newham from Romford Road to Barking Road alongside the River Roding and A406, through Little Ilford Park, Barrington Road playing fields, the former British Gas sports ground (now owned by Berkeley Homes) and Lady Trower Trust land owned by Aston Mansfield. A walking and cycling route could readily be established along this strip, connecting with the Roding via the footbridge at Watson Avenue. From Barking Road, the route could run south past the Tesco supermarket in Barking to Barking Quay and along the Roding itself to Fleet Road and Jenkins Lane, then via the path behind the old Showcase Cinema to Beckton Nature Reserve and the River Thames. Could a proposal along these lines for the Roding Valley Way be included in the Plan?	Comment noted. Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, such as the River Roding Way.

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Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/039	Transport	T2 Local transport			T2.2 b			<p>T2: Local Transport - Suggestion</p> <p>Point 2b of Policy T2 of the Draft Local plan states that major development should provide or contribute towards:</p> <p>a. Wayfinding in the local area, including through contributions towards Legible London. Very large development sites delivering their own streets or multiple blocks of housing should also deliver high quality wayfinding on their own sites.</p> <p>b. Cycle Hire provision. This could include the provision of a cycle hire dock on the applicant's land.</p> <p>These are then translated into the Planning Obligation where contributions are sought for "Local Cycle Hire – as per the Cycle Hire Strategy. This may involve monies for a docking station nearby, and/or land for a docking station to be located on site." The wordings of the policy, specifically that used in the point b., is not specific to an applicant's land or its local area.</p> <p>Recommendation</p> <p>SHL suggests that wordings in Point 2 of Policy T2 be amended, as planning obligations must be related to the development in accordance with the tests in the NPPF. Amended suggestion is to include wording such as "major development should assess the need to provide or contribute towards</p>	This wording change has not been made. We did not consider this change to be appropriate, as there may be cases where cycle hire monies are pooled to deliver a station in the local area, rather than delivered on the development site.
Reg18-T-063	Student	Reg18-T-063/012	Transport	T2 Local transport						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/033	Transport	T2 Local transport						We welcome the requirement for development to support 15-minute neighbourhoods, improve air quality, maximise health benefits, reduce carbon emissions and deliver sustainable growth, and points a–f to achieve this.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/034	Transport	T2 Local transport			T2.1			We welcome support for the delivery of Low Traffic Neighbourhoods, School Streets and Healthy Streets.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/035	Transport	T2 Local transport					T2.2	We support the requirement for development to provide or contribute towards wayfinding, including Legible London and TfL cycle hire provision as part of a wider London network.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/036	Transport	T2 Local transport					Planni ng Obliga tions	The Planning Obligations section also identifies contributions towards local transport and public realm improvements. For clarity, it would be helpful to include this as part of the core policy.	This wording change has been made. Please see the new wording in Planning Obligations T2.
Reg18-E-095	Transport for London	Reg18-E-095/037	Transport	T2 Local transport					T2.1	We support the requirement in T2.1 that ‘Development should show that the design of the scheme prioritises walking, cycling and public transport and discourages vehicle use’ and measures set out to achieve this.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/038	Transport	T2 Local transport						We look forward to providing input to the emerging Sustainable Transport Strategy to include a Walking Strategy and a Cycling Strategy. These documents should identify the existing route networks, barriers and gaps in provision, and proposals to address those barriers/gaps so that they provide an evidence base for seeking contributions from development.	Comment noted.
Reg18-E-095	Transport for London	Reg18-E-095/039	Transport	T2 Local transport					T2.1	In the second paragraph of T2.1 we would like to see additional wording inserted as follows: <u>‘Development should enhance the attractiveness of public transport services. Measures should seek</u>	This wording change has been made. Please see the new wording in Implementation T2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<u>to enhance the reliability, accessibility and ease of interchange of public transport services.'</u>	
Reg18-E-095	Transport for London	Reg18-E-095/040	Transport	T2 Local transport					Monitoring	Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.	This wording change has been made. Please see the new wording throughout the transport policies.
Reg18-T-059	Travels in borough daily	Reg18-T-059/005	Transport	T2 Local transport						[Keep it]	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/016	Transport	T2 Local transport			T2.1			Policy T2, suggest adding wording in new section 1g "Maximising opportunities for urban greening", to make best use of the proposed reallocation of road space.	This wording change has been made. Please see wording in T2.
Reg18-E-050	Anchor	Reg18-E-050/037	Transport	T3 Transport behaviour change						Policy T3 should provide flexibility for housing for older people to ensure it is effective.	This wording change has not been made. We did not consider this change to be appropriate as we are using the London Plan parking standards as a starting point.
Reg18-E-122	Ballymore	Reg18-E-122/017	Transport	T3 Transport behaviour change			T3.1			[Appendix 1] Ballymore support the approach to replacing the additional blue badge bay provision with mobility scooters in accessible locations, as set out in criterion c. This will provide benefits to the wider public realm and also reduce the amount of ground floors in residential buildings dedicated to car parking, resulting in increases in active frontage.	Support noted.
Reg18-E-077	Ballymore Group	Reg18-E-077/049	Transport	T3 Transport behaviour change			T3.1			Part 1 of the draft policy requires all new development to be car free. Ballymore strongly objects to this position: in areas with low PTAL, a level of car parking for non-blue badge holders is required for those who use cars for their jobs (i.e. plumbers and local business owners), as well as those with families and should therefore be	This wording change has not been made. We did not consider this change to be appropriate, in light of London Plan parking standards for inner London boroughs, Opportunity Area modal shift targets and a general policy direction to discourage private car use.

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										allowed. We support the delivery of car free development <u>as a starting point</u> in line with the London Plan, however, the current drafting is too restrictive and should allow for site specific challenges to be considered as part of this assessment.	
Reg18-E-077	Ballymore Group	Reg18-E-077/050	Transport	T3 Transport behaviour change			T3.5			Part 5 of the draft policy requires 100% provision for electric vehicle charging for residential from the outset, this should be amended to align with London Plan standards (i.e. 20% active charging from the outset with passive provision for the remainder).	This wording change has not been made. We did not consider this change to be appropriate as we wish to go beyond the London Plan to maximise the electrification of vehicles (noting the limited amount of parking delivered by this policy) - requiring a large rollout of electric vehicle charging points.
Reg18-E-040	CPRE	Reg18-E-040/047	Transport	T3 Transport behaviour change			T3.3			[Kerbside Strategy - use kerbside space for] safe cycle storage,	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.  The Sustainable Transport Strategy considers how safe cycle storage can be delivered on street.
Reg18-E-040	CPRE	Reg18-E-040/052	Transport	T3 Transport behaviour change			T3.5			[Kerbside Strategy - use kerbside space for] EV charging points on build-outs,	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.  The Sustainable Transport Strategy considers how more electric vehicle charging points can be built without blocking pavements.



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Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/015	Transport	T3 Transport behaviour change						Transport behaviour change We support Policy T3: Transport behaviour change recognising the need for car parking at commercial and industrial premises, where a justified level of car parking spaces would be accepted within new commercial and industrial development.	Support noted.
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/023	Transport	T3 Transport behaviour change						In addition, we support Policy T3: Transport behaviour change recognising the need for a justified level of car parking at commercial and industrial premises.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/154	Transport	T3 Transport behaviour change						Hadley supports the principle of car free development.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/155	Transport	T3 Transport behaviour change			T3.3			Point 3 requires new development to provide cycle parking in line, or higher than, the London Plan standards	Comment noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/156	Transport	T3 Transport behaviour change						Whilst this aligns with Hadley's ambition to deliver a sustainable scheme, it does not allow for alternative solutions, such as mobility hubs serving an entire scheme, to be considered	This wording change has not been made. We did not consider this change to be appropriate, as transport infrastructure (cycle parking, blue badge spaces, electric vehicle charging points etc.) should be delivered as close to residents as possible. In exceptional circumstances and where site constraints demand it, deviation from policy could be considered as part of the planning balance.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/157	Transport	T3 Transport behaviour change			T3.4			Such an approach would allow for a more comprehensive consideration of design and management requirements to encourage sustainable behaviours, such as the appropriate provision for charging (point 4)	This wording change has not been made. We did not consider this change to be appropriate, as transport infrastructure (cycle parking, blue badge spaces, electric vehicle charging points etc.) should be delivered as close to residents as possible. In exceptional circumstances and where site constraints demand it, deviation from policy could be considered as part of the planning balance.
Reg18-E-130	Hadley Property Group	Reg18-E-130/158	Transport	T3 Transport behaviour change			T3.5 .b			The provision of Electric Vehicle (EV) Charging Points should be in line with the London Plan (Part 5b) which requires for 20% of residential spaces to provide EV Charging Points rather than the 100% provision set out within the DLP	This wording change has not been made. We did not consider this change to be appropriate as we wish to go beyond the London Plan to maximise the electrification of vehicles (noting the limited amount of parking delivered by this policy) - requiring a large rollout of electric vehicle charging points.
Reg18-E-130	Hadley Property Group	Reg18-E-130/159	Transport	T3 Transport behaviour change			T3.5 .c			Part 5c requires major development with zero car parking on site to provide contributions to EV Charging Points elsewhere in the borough	Comment noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/160	Transport	T3 Transport behaviour change						Whilst this is not an issue in principle, the location of such charging points should be agreed with the Applicant to ensure those funded elsewhere in the borough benefit the future residents of the respective development	Comment noted - this would be determined at application stage.
Reg18-E-105	IQL South	Reg18-E-105/037	Transport	T3 Transport behaviour change			T3.1			IQL South supports the principle of car free development	Support noted.
Reg18-E-105	IQL South	Reg18-E-105/038	Transport	T3 Transport behaviour change			T3.1 .c			[supports] the principle in part c. to provide the additional blue badge spaces as mobility scooter parking in highly accessible locations.	Support noted.

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Reg18-E-105	IQL South	Reg18-E-105/039	Transport	T3 Transport behaviour change			T3.1 .c			[mobility scooter parking] This approach will improve the quality of public realm in urban locations, where restricted accessible parking bay take up is shown to be low.	Support noted.
Reg18-E-146	LBN - Public Health	Reg18-E-146/081	Transport	T3 Transport behaviour change					T3.3	[• Consideration of all, including older persons and the <u>disabled</u> ] 'disabled people'	This was an error and has now been corrected. Please see the new wording in T3.3.
Reg18-E-146	LBN - Public Health	Reg18-E-146/082	Transport	T3 Transport behaviour change					T3.6	[The Transport Assessment should illustrate accessibility to the site by all modes, the likely modal split of journeys to and from the site, proposed measures to improve access by public transport, walking and cycling, as well as compliance with other transport policies, including the London Plan (2021) Healthy Streets Approach. ] Consider stating that the assessment should consider / make reference to people with different characteristics - eg deprivation, ethnicity, age, disability etc. to show how the scheme will be equitable	This wording change has not been made. Detail regarding what should be included in the transport assessment are part of wider guidance, with the Healthy Streets approach supporting this.
Reg18-E-146	LBN - Public Health	Reg18-E-146/083	Transport	T3 Transport behaviour change					T3.7	[Travel Plans are a long term strategy that facilitates changes in travel behaviours in light of Newham's modal share objectives. These should be submitted in line with the Council's Travel Plan guidance. ] similarly to above, state travel plans need to consider different population groups - and follow up reporting needs to include equity assessment	This wording change has not been made. Detail regarding what should be included in the travel plan are part of wider travel plan guidance.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/035	Transport	T3 Transport behaviour change						<p><b>Transport</b> The Authority supports the policy on transport in the draft Local Plan and the inter-relationship with policy on the design of development and public realm provision. Policy that assists in shifting behaviour towards public transport and active travel will benefit the Regional Park and help to improve walking and cycling access to the Park that connects with public transport hubs and the surrounding communities. This policy will also assist in the delivery of PDF Area Proposals which emphasise the need for partnership working to deliver access improvements into and through the Park and to make the most of existing public transport hubs which serve the Regional Park such as those at Stratford, Canning Town, and Bromley-by-Bow.</p>	Comment noted, the Sustainable Transport Strategy sets out strategic transport improvements across the borough.
Reg18-E-012	Lidl	Reg18-E-012/007	Transport	T3 Transport behaviour change			T3.1 b			<p>T3 – Transport behaviour change This policy requires car parking for commercial uses must be the lowest justified quantity, yet there is a large part of the Borough which has a PTAL rating of 0-2, which is predominately located in the Beckton, Silvertown and Forest Gate areas. Many of these areas rely on the private vehicle to commute to work and to undertake regular activities such as shopping, which this policy fails to take into account. Adopting the London Plan requirements for the number of car parking spaces would be a logical step for the London Borough of Newham in order to not lead to inequalities for residents depending on where in the Borough they live.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate in light of London Plan parking standards, and a desire to reduce trips by private cars.</p> <p>The Sustainable Transport Strategy outlines that some industrial development in the borough may need car parking due to shift work, poor public transport accessibility and other considerations. At the application stage, the Council will push developers for the lowest quantity of parking required for the development.</p>

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/077	Transport	T3 Transport behaviour change						If our children can feel safe cycling on our streets then the plan would have been successful. Plz make it happen.	Comment noted. The Sustainable Transport Strategy and the Local Plan both support improvements to cycling in Newham.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/095	Transport	T3 Transport behaviour change						Need more money and delivery for active travel measures	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/110	Transport	T3 Transport behaviour change						Adequate cycle parking	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/111	Transport	T3 Transport behaviour change						Transport interchanges - better cycle facilities - scale that makes sense	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/114	Transport	T3 Transport behaviour change						LTNS/CCTVs - dispensations for local parking permits. All locals should have dispensation - potentially 1 a week or month. Applying for dispensation challenge	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested. Camera enforcement is a preferred mechanism to physical interventions (bollards and impermeable closures) as they enable emergency access.</p> <p>We do not restrict access to any street by car, we are reducing the opportunity of vehicles moving straight through areas from one side to the other.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/120	Transport	T3 Transport behaviour change						LTNs - in favour	Support noted.
Reg18-E-011	Metropolitan Police Service - Designing Out Crime	Reg18-E-011/012	Transport	T3 Transport behaviour change			T3.3			8) Where Cycle Storage is mentioned in Policy T3 (pages 269-275) it is important to ensure that our unit is consulted so that site specific requirements are met and can reach a compromise with London Cycle Design Standard (LCDS) Guidance where there may be conflict.	Comment noted, this would be dealt with at application stage. Officers would usually defer to the LCDS standards.

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Reg18-E-011	Metropolitan Police Service - Designing Out Crime	Reg18-E-011/013	Transport	T3 Transport behaviour change			T3.1			9) Where Car Clubs are mentioned in Policy T3 (pages 269-275) it is important to ensure that they are not provided within secure car parking areas unless they are only for those specific residents. Security can be compromised for private car parking areas if there is a legitimate use provided for non-residents to gain access. This can result in the car parking area being subject to crime and ASB. Car Club spaces should be ideally within public areas where required.	Comment noted, Policy T3.1 makes clear that car club bays should be publicly accessible.
Reg18-E-016	National Highways	Reg18-E-016/007	Transport	T3 Transport behaviour change						We welcome measures to reduce private car traffic generation in the first instance and the provision of sustainable transport measures	Comment noted.
Reg18-E-059	Newham Cyclists	Reg18-E-059/006	Transport	T3 Transport behaviour change				3.26 1- 3.27 3	T3.1- T3.7	NC strongly support the 'Justification' [3.261-3.273] and 'Implementation' [T3.1-T3.7] narrative sections of the T3. Transport behaviour change. See pages 271 -275.	Support noted.
Reg18-E-059	Newham Cyclists	Reg18-E-059/007	Transport	T3 Transport behaviour change						Notwithstanding the above statement, NC believe that the main strategic goal in terms of a 'Zero Carbon target/future' in terms of private car use should be on reduction and providing attractive alternative Active Travel mode options rather than encouraging private Electric Vehicle (EV) proliferation and its related charging infrastructure - a direct 'swap' for the current Internal Combustion Engine (ICE) vehicle use/levels scenario!!	Comment noted, policy encourages the uptake of zero-emission vehicles only in cases where residents and businesses require a vehicle, as outlined in the Sustainable Transport Strategy.
Reg18-E-027	Resident	Reg18-E-027/033	Transport	T3 Transport behaviour change			T3.1			I strongly support draft policy T3, particularly the requirement that all new developments will be car-free and must have car [cycle?] storage.	Support noted.

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Reg18-E-027	Resident	Reg18-E-027/035	Transport	T3 Transport behaviour change						I strongly support the emphasis on accessibility for Disabled people, such as dropped kerbs – and I appreciate the compromises that the Council has made with respect to what is sometimes can seem like a conflict between Disability access and car reduction. I do not support the section of the Disability Rights movement that seeks to stop most of the car reduction and pro-cycling schemes altogether. I say this as someone who has worked in the Disability rights movement for thirty years. However, I must come clean and disclose that I do not have a mobility impairment myself.	Support noted.
Reg18-E-027	Resident	Reg18-E-027/036	Transport	T3 Transport behaviour change						Having said that, although I support the increase in cycling infrastructure, I do think that there are quite a lot of times when cyclists behave quite dangerously. I think this is particularly dangerous for Disabled people, and it is worse when there are electric cycles.	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. We also want people to feel more comfortable walking and cycling on Newham’s streets. Newham Council is planning to introduce a 20mph speed limit on most streets across the borough.</p> <p>Lower speed limits can help to reduce the number of traffic collisions, reduce the likelihood of serious injuries in collisions, especially for pedestrians, reduce noise and pollution from motor traffic, and encourage people to walk and cycle more.</p> <p>The detection, prevention and investigation of criminal offences (such as speeding) is within the remit of the Metropolitan Police Service.</p>



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Reg18-E-027	Resident	Reg18-E-027/037	Transport	T3 Transport behaviour change						I don't support electric scooters. I think they are dangerous. It's not really safe for the scooter driver to go on the road, for their own safety, but it isn't safe for pedestrians for scooters to go on the pavement, which they often do. I don't think they help reduce car use because I think they are just used as a fun hobby, I don't think they are actually used as a method of transport to get from A to B.	The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested. The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. Electric scooters are currently not legal for use on the road.  The detection, prevention and investigation of criminal offences is within the remit of the Metropolitan Police Service.
Reg18-E-027	Resident	Reg18-E-027/038	Transport	T3 Transport behaviour change						I also think that some of the new developments, including LTNs, it's not always clear what is road and what is not and that is particularly dangerous for people with a visual impairment.	Comment noted. The design of specific highway infrastructure (including LTNs) is considered by the Sustainable Transport and Highways team, and follows best practice and guidance to ensure safety for all.
Reg18-E-027	Resident	Reg18-E-027/039	Transport	T3 Transport behaviour change						Electric cars There will be many who will try to argue cars are fine as long as they are electric. I am pleased that Newham Council hasn't really gone down that route, but you do make a little bit of a concession to that view. Electrification of cars is not the answer – it will put a strain on the electricity grid and make it difficult to supply all our electricity needs using renewable energy, particularly as we will need to electrify heating in homes.	Comment noted, policy encourages the uptake of zero-emission vehicles only in cases where residents and businesses require a vehicle, as outlined in the Sustainable Transport Strategy.
Reg18-E-002	Resident	Reg18-E-002/023	Transport	T3 Transport behaviour change						Create more areas for pedestrians and bikes only	Comment noted. The Sustainable Transport Strategy outlines how new, high quality areas of public realm will be delivered across the borough. The Local Plan will support this through new development.

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Reg18-E-002	Resident	Reg18-E-002/041	Transport	T3 Transport behaviour change						There is a lot of wishful thinking around the amount of walking people will do, haha! I currently do quite a bit of walking and would love routes to be walker friendly.	Comment noted. The Local Plan and the Sustainable Transport Strategy both work to improve existing walking routes, and provide new walking connections and routes.
Reg18-E-002	Resident	Reg18-E-002/044	Transport	T3 Transport behaviour change						Another thing is to make them properly wide enough as a bane of walkers, children and dog walkers is those cyclists who are hell-bent on smashing speed records, often not in their designated marked areas and terrorising pedestrians.	Comment noted.
Reg18-E-004	Resident	Reg18-E-004/001	Transport	T3 Transport behaviour change						I wanted to talk about the drive we said would be important, to have more bikes and and bike bunkers for storage in East Ham, at the work shop Green Infrastructure we did 2021.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested, as on street cycle parking does not need planning permission. Our colleagues in the highways department are able to help, and note that the Sustainable Transport Strategy considers the future provision and rollout of increased cycle parking across the borough. We have also provided them with your comments.
Reg18-E-004	Resident	Reg18-E-004/002	Transport	T3 Transport behaviour change						We still have none here, Brading Crescent, apart from one that is still not open and we have to apply for 6 spaces. For the whole estate. It's remarkably slow and inefficient. I applied for neighbourhood funds and that is the one we have here, after 15 years of campaigning.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested, as on street cycle parking does not need planning permission. Our colleagues in the highways department are able to help, and note that the Sustainable Transport Strategy considers the future provision and rollout of increased cycle parking across the borough. We have also provided them with your comments.
Reg18-E-091	Resident	Reg18-E-091/026	Transport	T3 Transport behaviour change						Reducing drop-kerbs applications across the borough would be a useful way of reducing loss to driveway conversions.	Support noted. Please see the wording in T3.6

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Reg18-E-098	Resident	Reg18-E-098/055	Transport	T3 Transport behaviour change						5 Environment The environment is about more than new LTNs and reducing traffic flow.	Comment noted - the wider Plan delivers improvements to the environment in light of our Climate Emergency commitments.
Reg18-E-098	Resident	Reg18-E-098/056	Transport	T3 Transport behaviour change						The DP does not have a wider transport philosophy and set of policies which facilitate and encourage people out of cars; rather it buys into the “bludgeon them out of them” philosophy.	Comment noted. The Sustainable Transport Strategy sets out the overall vision for transport in Newham, and how a move away from the private car towards public transport, walking and cycling will be delivered
Reg18-E-098	Resident	Reg18-E-098/057	Transport	T3 Transport behaviour change						LTN policies carry the risk of creating ghettos in some resident’s minds; How can Plan policies minimise this risk while putting forward policies to make neighbourhoods cleaner, greener and more user friendly	All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property.  Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.  More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/058	Transport	T3 Transport behaviour change						There needs to be a comprehensive approach to environmental issues--not just making it more difficult for residents to travel through their local areas and other travel related issues--How can the Plan help with this?	<p>The Sustainable Transport Strategy sets out the overall vision for transport in Newham, and how a move away from the private car towards public transport, walking and cycling will be delivered.</p> <p>The Local Plan considers environmental issues throughout - including in design, climate emergency and green and water space policies. With regard to residents travelling through their local areas - All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p>
Reg18-E-098	Resident	Reg18-E-098/059	Transport	T3 Transport behaviour change						Plan policies should promote the reinstatement of front gardens and walls as well as looking at further traffic calming measures . See above.	The policy approach has not been changed, as Local Plan policies promote traffic calming measures as well as high quality designs for front gardens and walls.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-048	Resident	Reg18-K-048/001	Transport	T3 Transport behaviour change			T3.3			<p>I think large developments and multi-storey buildings need to be taking greater consideration about how cycle traffic will exit from the public realm onto and into their demise.</p> <p>Its clear that there has been a lack of consideration about how cycling should be implemented at Westfield. Its virtually impenetrable by bike, and there is a lack of secure cycle parking. Conversely, there are multiple entrances for motor vehicles, whether it be for the numerous car parks, loading bays or bus stops/taxi ranks.</p> <p>We cant let this lack of cycle consideration happen again, particularly at such a large development, especially with the proposed developments in the pipeline.</p> <p>In conclusion, I think a development which is anticipated to have a reasonable amount of inhabitants should be designed to allow cycle traffic to easily and safely enter from the public realm and park within it just as easily as they would walk into it, or drive into a loading bay or car park. This could work with buildings as small as GP surgeries for example.</p>	Comment noted. Policy T3 asks applicants to consider routes to and from the cycling parking to the street, interior of the building and other facilities.
Reg18-K-048	Resident	Reg18-K-048/002	Transport	T3 Transport behaviour change			3.26 9			Please reference folding bikes when listing various types of non-standard bikes.	This wording change has been made. Please see the new wording in T3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-048	Resident	Reg18-K-048/003	Transport	T3 Transport behaviour change			T3.3			The local plan is silent on implementing the document as a whole. Please can this be referenced more often throughout the local plan. As it stands, the local plan is not very bold in encouraging cycle transport.  The only reference to it that I have seen relates to cycle parking (T3.3).	Comment noted. The Sustainable Transport Strategy sets out how encouraging cycling can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.
Reg18-T-121	Resident	Reg18-T-121/002	Transport	T3 Transport behaviour change			T3.3			[Change it] Ensure cycle infrastructure in new developments is easy to access without needing to take bikes on lifts etc which greatly diminishes the convenience.	Support noted - the policy considers how high quality cycle parking can be delivered as part of new development.
Reg18-T-121	Resident	Reg18-T-121/003	Transport	T3 Transport behaviour change			T3.3			[Change it] Also in my development, few of the parking spaces are used perhaps because the stackers are somewhat inconvenient. If it was fully car free I doubt it would have much impact but at least this way people have the option to own a car for longer trips out of the city. Do we need a blanket ban?	Support noted - the policy considers how high quality cycle parking can be delivered as part of new development.
Reg18-T-126	Resident	Reg18-T-126/027	Transport	T3 Transport behaviour change						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/022	Transport	T3 Transport behaviour change						[Add to it] Need more infor	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-068	Resident	Reg18-T-068/003	Transport	T3 Transport behaviour change						[Add to it] As before - improve bus services north to south - they are too few and too slow .	Comment noted. The Sustainable Transport Strategy considers improvements to bus routes in Newham, noting that TfL are responsible for planning and delivering bus routes in Newham.

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Reg18-T-068	Resident	Reg18-T-068/004	Transport	T3 Transport behaviour change						[Add to it] Ensure businesses & tradespeople can easily access their customers . Cargo bikes are not the answer!	A change to this policy approach has not been made. Local Plan policy also seeks to reduce car dominance and dependence, in favour of walking, cycling and public transport. It does not ban or prevent access to properties by cars or vans. Evidence shows that many businesses and tradesperson use cargo bikes and public transport in London.
Reg18-T-068	Resident	Reg18-T-068/005	Transport	T3 Transport behaviour change						[Add to it] A bit of realism is needed rather than totally car free utopian dreams - residents need services at their homes and businesses that aren't having to pay additional costs .	A change to this policy approach has not been made. Local Plan policy also seeks to reduce car dominance and dependence, in favour of walking, cycling and public transport. It does not ban or prevent access to properties by cars or vans.
Reg18-T-069	Resident	Reg18-T-069/036	Transport	T3 Transport behaviour change						[Add to it] Yes a change is definitely needed. I know that one of the initiatives is to have hubs locally so people don't have to travel so far but I think the hubs bring about unintended consequences too and don't provide enough open space.	Unfortunately it was not clear what change you wanted to make to this part of the Plan.
Reg18-T-069	Resident	Reg18-T-069/037	Transport	T3 Transport behaviour change						[Add to it] Walking is so easy. I heard from a scientist talking recently that we are designed to walk 10-15 kms a day. It really makes sense and would rid us of so many ills. It's what we were doing for millenia. More walkways that are pleasant and join up main areas, without noxious fumes would certainly help, plus re education.	Comment noted. The Sustainable Transport Strategy and the Local Plan both support improvements to walking in Newham.
Reg18-T-069	Resident	Reg18-T-069/038	Transport	T3 Transport behaviour change						[Add to it] Cycling has become popular but ecycles rather defeat the object.	Comment noted.

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Reg18-T-069	Resident	Reg18-T-069/039	Transport	T3 Transport behaviour change						[Add to it] Trains are a very good option for travel, far more so than buses so long as they are not jampacked, thus perhaps more frequent trains during rush hours and less maintenance problems. I learned through my work during the pandemic that many people got covid from bus travel! Lots of people breathing in each other's air on top of each other. I now realise how I got so many coughs and colds. So unhealthy. Necessary but like the trains, should not have to be overcrowded during peak hours.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-069	Resident	Reg18-T-069/040	Transport	T3 Transport behaviour change						[Add to it] I notice some people just get on the bus for one or two stops. Yes for the ones who really need it, but a big re education needs to happen with the above points in mind. If people were more healthy they wouldn't even want to get on a bus for a short distance. Bad diet has a LOT to answer for. Things need to be connected up, because they are connected. Transport is good to get out of town into the country, for visiting, for going to work if a bike or walking isn't feasible. But not for laziness, being overweight, not thinking it through, bad health (through diet, lack of exercise, bad lifestyle choices) I really do think that these behind the scenes causes should be taken into account, not just allow market forces to wreak havoc with health that has knock on effects with yes, even public transport.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-069	Resident	Reg18-T-069/041	Transport	T3 Transport behaviour change						[Add to it] Re private transport, likewise except even more so. Reduce the private transport (and unhealthy businesses transport) and make it a whole lot more difficult for people who don't really need to have a car. ULEZ in Newham.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-072	Resident	Reg18-T-072/022	Transport	T3 Transport behaviour change						[Add to it] Less crowding on platforms like Stratford station,	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-072	Resident	Reg18-T-072/023	Transport	T3 Transport behaviour change						[Add to it] easier access between platforms needed to link up to different modes of transport like bus stations.	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-078	Resident	Reg18-T-078/003	Transport	T3 Transport behaviour change						[Keep it]	Support noted.
Reg18-T-088	Resident	Reg18-T-088/025	Transport	T3 Transport behaviour change						[Add to it] rude, drunk, pocket thief people should be BAN in transport forever (after giving 3 times warning) that's the lesson for them and other will learn as well because they do always mess in the bus by their behaviour and in result other people waste their time. Also for extra healthy people (fat) should be separate seat because they have no choice to occupy 2 seats	Comment noted.
Reg18-T-109	Resident	Reg18-T-109/059	Transport	T3 Transport behaviour change						Please don't penalize drivers who are already suffering with ulez and council parking charges and fines...	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this. ULEZ is controlled by Transport for London, and parking charges are necessary to control the level of demand for parking in the borough - ensuring that there are enough spaces for residents, businesses and visitors.

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-110/034	Transport	T3 Transport behaviour change			T3.1			Policy T3 states all new development will be car free and that car parking for commercial uses must be the lowest justified quantity. This is designed to discourage vehicle use and encourage zero emission mobility, including active travel. Although we understand the ambition of the Council, the application of this policy wording is unrealistic, unjustified and does not align with the adopted London Plan requirements and ignores the fact that much of Newham has poor PTAL levels.	This wording change has not been made. We did not consider this change to be appropriate as we are following the London Plan parking standards for commercial uses.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/035	Transport	T3 Transport behaviour change			T3.1			Levels of parking for commercial uses should align with the site's PTAL and for retail uses acknowledge the fact that many customers wish to use a private vehicle to travel to and from store in order to carry their purchases home again easily. Again, this draconian approach will penalise bricks and mortar retailers to the benefit of online retailers.	This wording change has not been made. We did not consider this change to be appropriate as we are following the London Plan parking standards for commercial uses.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/036	Transport	T3 Transport behaviour change			T3.1			The London Plan (2021) allows flexibility to provide increased parking numbers, where necessary, in policy T6.3 and table 10.5. Generally, we would suggest that policy T3 is reviewed to ensure that there is sufficient flexibility within the policy to allow for some parking within centres where it is appropriate to the use of the site. Without this flexibility, as set out in the London Plan, there is a risk that customers will simply stop visiting centres as it would be more convenient to visit out of centre sites where there is ample parking, or to shop online and have the items delivered.	A change to this policy approach has not been made. We did not consider this change to be appropriate in light of a desire to reduce trips by private cars, and move towards active and sustainable transport. At the application stage, the Council will push developers for the lowest quantity of parking required for the development.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/060b	Transport	T3 Transport behaviour change			T3			7. Transport a. Draft Policy T3 (Transport behaviour change) <u>SEGRO strongly objects to part 1 of the draft Policy which states that “all new development will be car free”</u> . This is too restrictive and is not consistent with the rest of the Policy (including part (b)) which allows a level of car parking for commercial or industrial uses.	A change to this policy approach has not been made. We did not consider this change to be appropriate in light of London Plan parking standards, and a desire to reduce trips by private cars.  The Sustainable Transport Strategy outlines that some industrial development in the borough may need car parking due to shift work, poor public transport accessibility and other considerations. At the application stage, the Council will push developers for the lowest quantity of parking required for the development.
Reg18-E-116	SEGRO Plc	Reg18-E-116/060c	Transport	T3 Transport behaviour change				3.26 3		The supporting text at paragraph 3.263 acknowledges that a quantity of car parking may be justified for industrial development due to hours of operation/shift patterns/PTAL etc. as reflected in the London Plan (paragraph 10.6.18). This is an extremely important point, and it is essential that the Policy wording clearly reflects this	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy makes clear that car free development is the aim of the policy.  The Sustainable Transport Strategy outlines that some industrial development in the borough may need car parking due to shift work, poor public transport accessibility and other considerations. At the application stage, the Council will push developers for the lowest quantity of parking required for the development.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/040	Transport	T3 Transport behaviour change			T3.4			<p>T3: Transport Behaviour Change, Cycling-Objection</p> <p>The Draft Local plan states the following cycle charging points:</p> <ul style="list-style-type: none"> <li>• Policy T3.4 states that “the Sustainable Transport Strategy sets out charging requirements for sustainable transport storage. Where twenty or more long-term cycle parking spaces are provided, one e-charging point should be provided per twenty spaces.”</li> </ul> <p>The SHL are concerned about the absence of the referred document (Sustainable Transport Strategy) and that this policy is not present in the London Plan.</p> <p>Recommendation SHL suggest that Policy T3.4 should not be the subject of adoption until the Sustainable Transport Strategy has been the subject of a consultation process.</p>	Comment noted. The Sustainable Transport Strategy will contain modelling and recommendations for transport improvements in the borough, having undergone a period of a public consultation in early 2024.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/041	Transport	T3 Transport behaviour change			T3.5			<p>T3: Transport Behaviour Change, Electric Vehicle Charging Point - Objection</p> <p>The Draft Local plan states the following on electric vehicle charging point:</p> <ul style="list-style-type: none"> <li>Point 5a of Policy T3: “the delivery of Electric Vehicle Charging Points within a development is supported, and the following requirements must be met: a. Any new development that does provide parking must provide Electric Vehicle Charging Points, with 100 per cent of spaces at residential, and 20 per cent of other developments having Electric Vehicle Charging Points and future proofing of future installation at the remaining spaces.”</li> <li>Policy T3.5: “all parking at residential developments should include Electric Vehicle Charging Points.”</li> </ul> <p>SHL are concerned that this policy is not aligned with the London Plan where Policy T6.1 Residential Parking states that “At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces .” As the proportion of electric vehicles gradually increases so will the technology used to enable that charge. Committing to use current charging technology now when demand does not require 100% provision, risks installing underused infrastructure (with associated construction and carbon costs) and removes opportunity to provide more efficient infrastructure when demand increases.</p>	<p>This wording change has not been made. We did not consider this change to be appropriate as we wish to go beyond the London Plan to maximise the electrification of vehicles (noting the limited amount of parking delivered by this policy) - requiring a large rollout of electric vehicle charging points.</p>

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Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/042	Transport	T3 Transport behaviour change			T3.5.c			<p>Additionally, Point 5c of Policy T3 states that “major developments with zero car parking on site must provide contributions towards Electric Vehicle Charging Points in other parts of the borough.” The Planning Obligation section also stated that “contributions will be sought from developments for:</p> <ul style="list-style-type: none"> <li>• Electric Vehicle Charing Points to be located elsewhere in the borough</li> </ul> <p>SHL are concerned that the wordings used for these sections are not specific to an applicant’s land or its local area, and as such cannot be considered as meeting the test of being “directly related to the development” that is required to enforce a planning obligation. The policy must enable an assessment of need for electric charging for the specific development proposed.</p>	This policy approach has now changed to make clear that electric vehicle charging point contributions is to serve deliveries, servicing and visitors. We seek to increase the number of electric vehicle charging points noting that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars. Please see the new wording in Policy T3.5.
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/043	Transport	T3 Transport behaviour change			T3.5			<p>Recommendation</p> <p>SHL suggest that Point 5a of Policy T3 and Policy T3.5 are amended to be aligned with the London Plan. Point 5a and Policy T3.5 should maintain 20 per cent of residential parking spaces to have active charging facilities, with passive provision for all remaining spaces.</p>	This wording change has not been made. We did not consider this change to be appropriate as the electrification of vehicles (and the limited amount of parking delivered by this policy) will require a large rollout of electric vehicle charging points.
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/044	Transport	T3 Transport behaviour change						<p>Additionally, SHL suggest that Point 5c and the Planning Obligation list to be amended to be directly related to development or removed.</p>	This wording change has not been made. We did not consider this change to be appropriate, as we seek to increase the number of electric vehicle charging points noting that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/043	Transport	T3 Transport behaviour change					T3.1	Policy T3 seeks developments to have no parking spaces albeit industrial/commercial uses must have the lowest justifiable quantity. T3.1, however, does state that this is when uses have 24-7 hours of operation, multiple shift patterns, low employment density and a very low PTAL (level 2 or below). Sport facilities would not appear to fall into this requirement. Limited parking could affect the operation of a facility or the ability for someone to use a facility as it could cause difficulties transporting equipment, travelling to 'away' games (especially junior teams) and for those less mobile who need specialist equipment.	This wording change has not been made. We did not consider this change to be appropriate as we encourage sporting facilities to be located in well-connected and accessible locations. Disabled people or people with mobility issues would be able to use blue badge parking.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/160	Transport	T3 Transport behaviour change			T3.1.c			The Berkeley Group supports a car free approach and associated measures including car clubs, cycle parking and electric vehicle charging and welcomes the inclusion within point 1 (c) of mobility scooter parking being considered appropriate instead of additional blue badge spaces in areas of high public transport accessibility. The Berkeley Group's experience is that blue badge spaces are often not used despite being provided in line with policy and mobility scooter parking has the potential to meet the needs of mobility impaired individuals as much or more than blue badge spaces are able to. Mobility scooter spaces are also less demanding in terms of space requirements which is beneficial when space planning and balancing competing planning policy requirements and delivering high quality place making.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East	Reg18-E-136/161	Transport	T3 Transport behaviour change						As an overall comment, Policy T3 is detailed and fairly prescriptive in parts and similar to other draft policies provides guidance that might be better suited within supplementary planning guidance.	This wording change has not been made. We did not consider this change to be appropriate as we do not plan to have supplementary planning guidance.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
	London Limited										
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/162	Transport	T3 Transport behaviour change			T3.2 .b			Point 2 (b) for example requires any parking provision to be in short rows of up to three car spaces...preferably on only one side of the street. This requirement is particularly detailed and does not enable site specific circumstances to be taken account of. The Berkeley Group would suggest that this recommendation is removed to enable the design and layout of parking provision to be considered on a case by case basis. Proposed policy wording change: 2. The limited provision of parking within the site should form part of the wider urban design strategy so that it: <del>b. Is provided in short rows of up to three car spaces, or one larger servicing parking space, interspersed with trees, and preferably on only one side of the street.</del>	This policy approach has now changed to simplify the policy. Please see the new wording in T3.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/163	Transport	T3 Transport behaviour change			T3.5			The Berkeley Group supports the requirement or support for the delivery of Electric Vehicle Charging Points within a development (point 5)	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/164	Transport	T3 Transport behaviour change			T3.5			....albeit would note that where parking can only be provided in the basement of a development there is an ongoing issue with meeting relevant fire regulations and this should be taken account of when considering the requirements of this policy. Proposed policy wording change: 5. The delivery of Electric Vehicle Charging Points within a development is supported, and the following	This policy approach has now changed to make clear that electric vehicle charging point contributions is to serve deliveries, servicing and visitors. We seek to increase the number of electric vehicle charging points noting that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars. Please see the new wording in Policy T3.5.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										requirements must be met: <del>e. Major developments with zero car parking on site must provide contributions towards Electric Vehicle Charging Points in other parts of the borough.</del>	
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/165	Transport	T3 Transport behaviour change			T3.5 .c			Point 5 (c) outlines a requirement for major developments with zero car parking on site to provide contributions towards EVCP's in other parts of the borough. Whilst the Berkeley Group supports the encouragement given to the provision of EVCP's, it is not considered necessary to provide this contribution where a development is meeting the primary transport objective of achieving car free development.	This wording change has not been made. We did not consider this change to be appropriate as vehicles delivering, servicing or visiting a site will need to be charged. The policy has been expanded to support this.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/129	Transport	T3 Transport behaviour change						[Add] How zero-parking developments can cause consequences in surrounding area	Comment noted. Residents in car free developments are unable to apply for parking permits, and are encouraged to use more sustainable modes of travel.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/030	Transport	T3 Transport behaviour change			T3.3 c			Stratford East supports the policy and encourages the replacement of the additional blue badge spaces with mobility scooter parking set out in part c. This approach will help minimise the amount of space taken up by parking in the public realm and positively responds to the low take up of blue badge parking in highly accessible locations, such as the N8 Stratford and Maryland neighbourhood.	Support noted.
Reg18-T-063	Student	Reg18-T-063/013	Transport	T3 Transport behaviour change						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/005	Transport	T3 Transport behaviour change						We strongly support the requirement for all development to be car free	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/006	Transport	T3 Transport behaviour change						and also welcome the reference to mode share targets (although these should reference targets specific to Newham and be embedded in the monitoring).	This wording change has been made. Please see the new wording throughout the transport policies.
Reg18-E-095	Transport for London	Reg18-E-095/007	Transport	T3 Transport behaviour change						It would be helpful to confirm that development will also need to help deliver the Mayor's Vision Zero road safety objective.	Comment noted, Vision Zero has been inserted in several places in the policy.
Reg18-E-095	Transport for London	Reg18-E-095/041	Transport	T3 Transport behaviour change			T3.1			We strongly support the requirement in part 1 that all development will be car free, which is consistent with London Plan Policy T6.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/042	Transport	T3 Transport behaviour change			T3.1			It may be helpful to clarify that Blue Badge parking is an exception for both residential and commercial uses	This wording change has been made. Please see the new wording in T3.
Reg18-E-095	Transport for London	Reg18-E-095/043	Transport	T3 Transport behaviour change			T3.1 .b			Part 1.b. which states that 'Car parking for commercial or industrial uses must be the lowest justified quantity' could be seen as inconsistent with the commitment for development to be car free. For consistency with the London Plan, it may be better to state that 'Where justified for operational purposes, a very limited amount of vehicle parking may be provided for commercial or industrial uses within the maximum standards set by the London Plan.'	This wording change has been made, to make clear that any parking should be within the maximum standards set within the London Plan. At the application stage, the Council will push developers for the lowest quantity of parking required for the development.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/044	Transport	T3 Transport behaviour change			T3.1 .c			Part 1.c., 'For residential developments mobility scooter parking may be considered instead of additional blue badge spaces in areas of the borough with high levels of public transport accessibility and close to accessible stations' is supported in principle, but it should be clarified that London Plan requirements for parking provision for disabled residents in Policy T6.1 would generally be applied and that parking for mobility scooters would only be considered as an exception where justified. In such circumstances it must also be demonstrated that the route to/from accessible public transport is accessible and that there are a range of local services and facilities within easy reach of all people, including those who need step free routes	This policy approach has now changed due to make the minimum requirements for mobility scooter parking clear. Please see the new wording in Policy T3.1
Reg18-E-095	Transport for London	Reg18-E-095/045	Transport	T3 Transport behaviour change			T3.1 .d			In part 1.d. care should be taken with provision of car club bays in areas with high levels of connectivity where they may serve to encourage and facilitate car use for journeys that could be undertaken by walking, cycling or public transport.	Comment noted.
Reg18-E-095	Transport for London	Reg18-E-095/046	Transport	T3 Transport behaviour change			T3.3			We support the requirement in part 3 for cycle parking in line with or higher than the minimum London Plan standards. This should consider both quality and quantity, including minimum levels of provision for non-standard cycle parking and demonstrating inclusive design.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/047	Transport	T3 Transport behaviour change			T3.4			In part 4, charging of batteries for e-bikes may be best located away from cycle parking areas due to fire safety concerns. Batteries for e-bikes can generally be detached and charged at a conventional socket within the home.	This wording change has been made. Please see the new wording in Policy T3

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/048	Transport	T3 Transport behaviour change			T3.5 .c			In part 5.c., it is not clear why major development with zero car parking on-site should contribute towards Electric Vehicle Charging Points elsewhere in the borough unless this is to cater for delivery and servicing vehicles.	This policy approach has now changed to make clear that electric vehicle charging point contributions is to serve deliveries, servicing and visitors. We seek to increase the number of electric vehicle charging points noting that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars. Please see the new wording in Policy T3.5.
Reg18-E-095	Transport for London	Reg18-E-095/049	Transport	T3 Transport behaviour change			T3.5			We would however encourage active EVCP for all disabled persons' parking and any parking justified for operational purposes (including all taxi ranks).	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/050	Transport	T3 Transport behaviour change					T3.1	For clarity and consistency, the requirements for Blue Badge parking in T3.1 should refer to London Plan Policies T6.1 (for residential) and T6.5 (for non-residential uses).	This wording change has been made. Please see the new wording in T3.
Reg18-E-095	Transport for London	Reg18-E-095/051	Transport	T3 Transport behaviour change					T3.2	Rather than setting out details of parking design in a Design and Access Statement and Landscaping Assessment it would be appropriate to require a Parking Design and Management Plan in line with Policy T6 of the London Plan.	This wording change has been made. Please see the new wording in T3.2
Reg18-E-095	Transport for London	Reg18-E-095/052	Transport	T3 Transport behaviour change					T3.6	In T3.6 it would be helpful to include a reference to Transport Assessments which provide a basis to identify impacts on the transport network and to determine the need for appropriate mitigation.	This wording change has been made. Please see the new wording in T3.
Reg18-T-059	Travels in borough daily	Reg18-T-059/006	Transport	T3 Transport behaviour change						[Add to it] This needs to be stronger, and work from schools all the way up to the elderly	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/044	Transport	T3 Transport behaviour change			T3.3 and T3.4			<p>Policy T3 'Transport Behaviour Change'</p> <p>Parts 3 and 4 of Policy T3 requires cycle parking in line with London Plan standards, as well as provision for E-bikes, electric scooters, and mobility scooters from major developments:</p> <p>3. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan (2021) standards)</p> <p>4. Major developments should make provisions for charging of E-bikes, electric scooters, and mobility scooters within their sustainable transport storage.</p> <p>Unite make the following comments in response to amount of cycle parking sought:</p> <ul style="list-style-type: none"> <li>• From experience, Unite have seen that the provision of cycle parking at policy compliant levels is severely underused. This is the case at existing developments in the Stratford area such as Angel Lane and Stratford One.</li> <li>• A survey undertaken by Unite in February 2018 across 26 of their sites concluded that the average demand for cycle parking storage is 5% of bedspaces, which equated to one space per 20 students.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).
Reg18-E-119	Unite Group plc	Reg18-E-119/045	Transport	T3 Transport behaviour change			T3.3 and T3.4			<ul style="list-style-type: none"> <li>• In addition, student accommodation is generally within walking distance of places of study and in areas with high levels of public transport. These alternative means of transport diminish the need for private cycle ownership.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).

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Reg18-E-119	Unite Group plc	Reg18-E-119/046	Transport	T3 Transport behaviour change			T3.3 and T3.4			<ul style="list-style-type: none"> <li>There has also been a significant increase in cycle hire schemes which provide an additional, affordable alternative to private ownership.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).
Reg18-E-119	Unite Group plc	Reg18-E-119/047	Transport	T3 Transport behaviour change			T3.3 and T3.4			<ul style="list-style-type: none"> <li>The overprovision of cycle spaces can lead to the loss of valuable floorspace which could be used for more active ground floor uses, therefore reducing the efficiency of the use of the land.</li> <li>Thus, even if 25% of The London Plan requirements are provided, this will future proof cycle parking provision and avoid wasted space.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).
Reg18-E-119	Unite Group plc	Reg18-E-119/048	Transport	T3 Transport behaviour change			T3.3 and T3.4			<ul style="list-style-type: none"> <li>The loss of further floorspace to provide spaces for larger E-bikes, electric scooters, and mobility scooters will further impact on the level of floorspace that could be given over to active ground floor uses. Particularly in highly accessible areas it is unlikely that the private ownership of these vehicles would be needed. In addition, they are more likely to be used as part of hire schemes which provide their own parking stations around the city.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).
Reg18-E-119	Unite Group plc	Reg18-E-119/049	Transport	T3 Transport behaviour change			T3.3 and T3.4			<p>Recommendations:</p> <ul style="list-style-type: none"> <li>The wording is amended to allow for reduced provision of cycle parking and to remove the requirement for E-bike, electric scooter and mobility scooter spaces, where it can be demonstrated that the site is in a highly accessible location, or where cycle hire schemes or pool bikes are being provided.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-012	Lidl	Reg18-E-012/008	Transport	T4 Servicing a development			T4.5			T4 – Servicing a development Policy T4 is requiring developments that service and/or deliver to other locations should ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for ‘last mile’ journeys. However, there is no provision within the New Local Plan for servicing lorries to park prior to this ‘last mile’ journey. Within the Borough, Lidl service numerous stores and this approach is inefficient for deliveries to ensure sufficient stock replenishment to provide local people with the products they require. This approach is also not economically viable given the servicing plans in place regarding the number of drivers and ensuring prices remain low for the consumers. As such, Lidl object to this approach and it is recommended that sufficient delivery and servicing plans are adequate to mitigate any impact to highways.	A change to this policy approach has not been made. We did not consider this change to be appropriate, given we wish deliveries to occur using zero emission vehicles and cargo bikes. The Sustainable Transport Strategy supports the electrification of the transportation network, in line with national policy.
Reg18-E-059	Newham Cyclists	Reg18-E-059/008	Transport	T4 Servicing a development				3.27 4- 3.27 8	4.1- T4.5	NC strongly support the ‘Justification’ [3.274-3.278] and ‘Implementation’ [T4.1-T4.5] narrative sections of the T4.Servicing a development. See pages 276 -277.	Support noted.
Reg18-E-033	Port of London Authority	Reg18-E-033/036	Transport	T4 Servicing a development						Within the policy there must be a specific requirement for developments located in close proximity to navigable waterways to robustly consider the use of waterways as part of the construction stage and show evidence of how this has been considered, including through the supply chain and as part of the ongoing servicing and delivery strategy of a development. This would support wider policy objectives and further assist	This wording change has been made. Please see wording in Policy T4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										in reducing the impact on the boroughs highways by taking movements off roads and onto the river.	
Reg18-T-043	Resident	Reg18-T-043/011	Transport	T4 Servicing a development						[Change it] It seems like nearly every month there are both planned and unplanned maintenance for the underground and DLR tracks in the night next to Canning Town station. While it is tolerable in winter as windows are mostly closed, it is super disturbing in summer nights. While I do understand the need for maintenance, I would kindly ask to limit those to winter months...	Comment noted. Transport for London are responsible for maintaining the Underground and DLR tracks, any issues should be directed to them.
Reg18-T-126	Resident	Reg18-T-126/028	Transport	T4 Servicing a development						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/023	Transport	T4 Servicing a development						[Add to it] Need more information	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-072	Resident	Reg18-T-072/024	Transport	T4 Servicing a development						[Add to it] Keep all safe and clean for users. TQ	Comment noted. The Sustainable Transport Strategy considers improvements to public transport in Newham, noting that TfL are responsible for planning and delivering this in Newham.
Reg18-T-078	Resident	Reg18-T-078/004	Transport	T4 Servicing a development						[Keep it]	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-116/060a	Transport	T4 Servicing a development			T4.5			<p>b. Draft Policy T4 (Servicing a development)            SEGRO recognises that Government targets and legislation will drive industries over the coming decades, and SEGRO firmly believe that it is both possible and environmentally responsible to seek to achieve zero-emission fleets sooner than those government targets.            However, it is also recognised that the industry is still developing at this time, and that the production of electric fleet vehicles has been adversely impacted by significant recent events/situations (such as Brexit and COVID-19) which have decelerated industry advancement to some extent and resulted in the availability of electric fleet vehicles in the UK remaining short of the projected demand. It is therefore expected that a transition period will be required to allow operators to adopt this new technology gradually as the availability of electric fleet vehicles improves over time.</p> <p>Likewise, SEGRO acknowledges the important role that cargo bikes can play in achieving sustainability goals and reducing carbon impact. However, in some instances it will not be feasible for cargo bikes to service developments as these are generally best suited to ultra-urban depots located in densely populated areas. They are not efficient or practical where the distances between depot and consumer, and between consumers, are high.</p> <p>It is therefore suggested that part (5) of the draft Policy be amended to allow flexibility where it can be</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate given poor air quality in Newham, and the large quantity of deliveries and servicing to other boroughs. The Sustainable Transport Strategy outlines how servicing by sustainable means can be encouraged through the use of zero-emission vehicles or e-cargo bikes, increased numbers of parcel lockers as well as freight consolidation between businesses.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>demonstrated that the policy requirements cannot feasibly be met. The following amendment is suggested:  “Developments that service and/or deliver to other locations should:  <b>a. Ensure Facilitate and enable the deployment of</b> zero emission vehicles or cargo bikes for ‘last mile’ journeys, <b>where feasible...</b>”</p>	
Reg18-E-095	Transport for London	Reg18-E-095/053	Transport	T4 Servicing a development						<p>Although it is made clear in T4.1, the core policy should include requirements for Construction Logistics Plans and Delivery and Servicing Plans, in line with London Plan Policy T7.</p>	<p>Comment noted, the implementation section of Policy T4 makes clear that Construction Logistics Plans and Delivery and Servicing Plans are required.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/054	Transport	T4 Servicing a development						Similarly, the core policy should include a presumption that servicing should take place off street wherever possible and that on street servicing should be an exception and only where it does not impact the safety, comfort and convenience of people walking and cycling, public transport users and public transport operations.	This wording change has not been made, as a presumption for off street servicing may be too restrictive. The policy aims to ensure that servicing and deliveries to and from a site can take place safely, without causing highways impacts or endangering vulnerable road users.
Reg18-E-095	Transport for London	Reg18-E-095/055	Transport	T4 Servicing a development						We welcome support for cargo bikes. These should take precedence over zero emission vehicles which still cause congestion and increase road danger.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/056	Transport	T4 Servicing a development					T4.3	Reference to the safety implications in T4.3 should encourage accreditation such as Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS).	This wording change has been made. Please see the new wording in Implementation T4.3.
Reg18-E-146	LBN - Public Health	Reg18-E-146/084	Transport	T5 Airport			T5.4			[4. Any development proposal must mitigate any impact on local residents,] is it worth adding it would need a HIA as part of the EIA?	A change to this policy approach has not been made. A decision on whether a HIA would be required would be taken at application stage. Policy BFN3 outlines the requirements for an HIA.
Reg18-E-146	LBN - Public Health	Reg18-E-146/085	Transport	T5 Airport					T5.2	[• Development proposals which would increase the number of actual aircraft movements from the airport, or reduces the extant respite period. • Development that would enable the use of the airport site for helicopters or drones. • Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.] Is it worth including other things that may be unacceptable depending on the impact - including days and times of flights and size of planes.	A change to this policy approach has not been made, as the policy makes clear that reduction in the extant respite period or the introduction of night flights would not be acceptable.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-146	LBN - Public Health	Reg18-E-146/086	Transport	T5 Airport					T5.2	<ul style="list-style-type: none"> <li>• Development proposals which would increase the number of actual aircraft movements from the airport, or reduces the extant respite period.</li> <li>• Development that would enable the use of the airport site for helicopters or drones.</li> <li>• Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.] Also - mention impacts that may make a proposal unacceptable - eg health / social impacts (assessed through a SV-HIA)</li> </ul>	A change to this policy approach has been made, to make clear the un-mitigatable and unacceptable impacts.
Reg18-E-146	LBN - Public Health	Reg18-E-146/087	Transport	T5 Airport					T5.4	[Development should demonstrate how impacts on local residents will be mitigated. Examples of impacts that would need to be mitigated include noise, vibration, smell and air quality. This should be demonstrated in documentation submitted as part of a planning application. Works to mitigate impacts may be secured by condition.] including SV-HIA. Do we need to link this to T5.2 to say the council will not support applications where the impacts are considered to be unacceptable?	A change to this policy approach has not been made. A decision on whether a SV-HIA would be required would be taken at application stage. The policy also makes clear that "where negative impacts would be unacceptable even following mitigation, development would not be supported." Policy BFN3 outlines the requirements for the HIAs.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/080	Transport	T5 Airport						Transport - airport noise issue	Comment noted. The Council maintains a stringent monitoring process to ensure that the airport complies with conditions of its planning permission.
Reg18-E-057	London City Airport	Reg18-E-057/003	Transport	T5 Airport						However, we are concerned that the draft policies dealing with the airport (particularly T5) are unsound and must be revised. The thrust of Policy T5, as drafted, will also compromise the Council's ability to achieve its stated objectives for the borough over the plan period.	Comment noted.

Reg18-E-057	London City Airport	Reg18-E-057/006	Transport	T5 Airport					<p><u>2022 planning application</u>  On 19 December 2022 an application to vary the CADP permission was submitted to the Council. The application includes proposals to serve increasing passenger demand and make best use of the airport's existing infrastructure by:</p> <ul style="list-style-type: none"> <li>• increasing the current planning cap on the number of passengers from 6.5 million to 9 million passengers per annum;</li> <li>• extending operating hours on Saturday from the current closing time of 12:30pm to 6:30pm, with an additional hour in Summer for arriving flights only, up to a maximum of 12;</li> <li>• allowing three additional flights in the first half hour of operations on Mondays to Saturdays (6:30am-6:59am) with a new limit of nine flights instead of the current limit of six flights;</li> <li>• mandating that only cleaner, quieter, new generation aircraft will be allowed to operate in any newly extended hours on a Saturday, and for any new flights in the first half hour of the day.</li> </ul> <p>The airport carried out a comprehensive 10-week consultation on these proposals last summer. Having listened to the feedback received, the airport adjusted its proposals in a number of key areas as follows:</p> <p>[See Table with comparison of consultation and application]</p> <p>The application does not include any proposals to:</p> <ul style="list-style-type: none"> <li>• increase the annual number of permitted flights, which will remain at 111,000 ATMs;</li> <li>• change the existing eight-hour nightly curfew, or current Sunday operating hours (with no flights before 12.30pm); or</li> <li>• build any new infrastructure, beyond what is already consented.</li> </ul>	Comment noted.
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										<p>The environmental statement accompanying the application carefully assesses the proposals and concludes that no significant adverse impacts have been identified. This takes into account a comprehensive mitigation package proposed, including improvements to the airport's sound insulation scheme for residential and public buildings, a much-increased Community Fund of £3.8million to invest in local projects and amenity improvements and the introduction of a new Transport Fund of £2 million a year to improve local connectivity and achieve our ambitious targets for sustainable transport use by passengers and staff.</p> <p>The proposals will allow the airport to continue to support London's post pandemic economic recovery, make a substantial contribution to Newham's aspirations for levelling up and growth and create almost 2,200 additional jobs, with 1,340 of these jobs located at the airport site. Many of these jobs will be available for residents of Newham and will significantly contribute to its future success and growth.</p> <p>The commitment to only allow cleaner, quieter, new generation aircraft in the newly extended hours on Saturdays and for any new flights in the first half hour will incentivise airlines to replace their older fleets more quickly in order to benefit from any increased flexibility, which in turn will accelerate the benefits of quieter aircraft for local residents throughout the week.</p> <p>By allowing more flexible hours, airlines will have the ability to increase the frequency of existing routes and fly to new destinations, boosting Newham's links with the UK and the wider world, but also benefiting passengers and businesses that have made, or will make, East London their home. Overall, the proposals will deliver an economic</p>
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									<p>boost to Newham and the local area of nearly £200m a year through improved business productivity and enhanced tourism opportunities as well as substantial savings in the cost and time involved in air travel for local residents.</p> <p>The proposals will also help the airport deliver on our plans to become London's first net zero emissions airport by 2030. A new Energy Strategy will help decarbonise our heating and cooling systems, while in parallel we will work with airlines to increase the usage of Sustainable Aviation Fuels at the airport. The proposals are also consistent with the airport's plans to explore opportunities for hydrogen and zero emission flying. As part of our focus, we will work with industry and partners to put the airport, and East London, at the forefront of this transition.</p> <p><u>2020 master plan</u> The December 2022 application is consistent with the LCYs 2020 master plan which sets out how the airport can respond to increasing demand to fly from LCY in a sustainable and responsible way. The master plan was produced, following detailed consultation, in line with Government guidance as set out in the Aviation Policy Framework. In the context of the clear ongoing support for airport expansion due to the important economic benefits it brings, as set out by the Government in Flightpath to the Future and reiterated in the Jet Zero Strategy, the production of a master plan by an airport is intended to inform the Local Plan so that sustainable growth could be provided for.</p> <p>As explained in LCY's master plan, forecasts suggest that the airport could handle up to 11mppa annually by the mid-late 2030's accommodated on up to 151,000 ATMs per year and in doing so can:</p> <ul style="list-style-type: none"> <li>• Create up to 5,300 local jobs and economic</li> </ul>	
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									<p>benefits to support the recovery of East London;</p> <ul style="list-style-type: none"> <li>• Establish a new onsite Aviation Centre of Excellence to create more highly skilled, good quality jobs and creating additional pathways into employment at the airport;</li> <li>• Add £210 million in annual economic output (GVA) through local employment opportunities;</li> <li>• Contribute up to £2 billion to the London and UK economy by the time 11mppa is reached;</li> <li>• Enhance connectivity with more flights to new destinations both nationally and internationally – supporting the wider London economy by providing strategy regional and international connectivity for business and tourism; and</li> <li>• Respond to increasing passenger demand in a sustainable and responsible way by managing environmental impacts and achieving net zero in line with our published targets.</li> </ul> <p><u>LCY Net Zero by 2030</u></p> <p>The December 2022 application is also consistent with the airport’s May 2022 Sustainability Roadmap [Hyperlink to <a href="https://sustainability.londoncityairport.com/">https://sustainability.londoncityairport.com/</a>] in which the airport has outlined five core commitments to:</p> <ul style="list-style-type: none"> <li>• Become London’s first net zero emissions airport by 2030;</li> <li>• Be one of the first in the UK to facilitate zero emission flight;</li> <li>• Support local people by creating more opportunity, increasing investment for community groups, and requiring all on-site partners to pay the London Living Wage by 2026;</li> <li>• Be the best-connected airport in the UK with 80% of all passenger journeys to be made by sustainable transport modes by 2030; and</li> <li>• Eliminate all avoidable single-use plastics within the airport by 2025 and be a zero-waste airport by 2030.</li> </ul>	
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										<p>The airport therefore has clear plans for its sustainable evolution over the longer term. As we explain below, it is important that policies in the plan, particularly draft policy T5, do not stifle the airport's role as a major employer for Newham and a catalyst for inward investment, particularly in the Royal Docks, as well as the many economic benefits from business and tourism that flow from LCY connecting Newham directly to destinations across the UK and Europe. It is our view that as drafted, policy T5 is contrary to Government policy where future growth can be delivered sustainably</p>	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/007	Transport	T5 Airport						<p>Representations on draft Policy T5</p> <p>This policy takes entirely the wrong approach to the control of development at the airport and should be completely revised. For instance, Paragraph 3.286 of the draft plan states that expansions in the size, function, operating hours and frequency of the airport activity are not supported, whilst T5.2 of the implementation table precludes increases in the actual aircraft movements, the use of the airport for helicopters/drones and precludes the airport being used for freight purposes. None of the evidence base documents published by the Council support such an approach. Indeed, the Council currently has no evidence before it which justifies precluding any form of development at the airport.</p>	<p>A change to the policy approach has been made, to make clear than some negative impacts could be mitigated. Please see the new wording in Policy T5. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. It is considered that reducing the extant respite period or the introduction of night flights would result in an un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.</p>
Reg18-E-057	London City Airport	Reg18-E-057/008	Transport	T5 Airport						<p>Appended to this letter is a table with necessary amendments to the policy. Our more general commentary on policy T5 is provided below in the context of 'soundness test' and associated criteria in paragraph 35 of the NPPF.</p>	<p>Comment noted.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/009	Transport	T5 Airport						<p>Not positively prepared</p> <p>As indicated above, the Council has not provided any evidence which objectively demonstrates that it is appropriate to preclude increases in aircraft movements or operational changes as suggested in draft policy T5. Indeed, there is no indication that the Council has taken into account the clear evidence which is available, including:</p> <ul style="list-style-type: none"> <li>• Airport's 2020 master plan. National policy in the 2013 Aviation Policy Framework (paragraph 4.11) specifically requires planning authorities to have regard to such master plans because they are intended to: "...provide a clear statement of intent on the part of the airport operator to be given due consideration in local planning processes."</li> <li>• National Aviation forecasts. In July 2022 the Government published its Jet Zero Strategy, which sets out national policy on how the airport industry can grow sustainably and consistently with the UK's Net Zero target for 2050. Alongside the consultation, Government published a dataset explaining the forecast national capacity assumptions for growth at individual airports, including LCY, for which it has allowed for growth beyond the current limits, up to 151,000 ATMs and 11mppa from 2030 onwards and it assumes that such growth would, in principle, be consistent with achieving the Jet Zero Strategy objectives.</li> </ul> <p>Precluding any increases in actual aircraft movements or other changes to operations</p>	<p>A change to the policy approach has been made, to make clear than some negative impacts could be mitigated. Please see the new wording in Policy T5. Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p>

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										therefore contradicts the evidence that is available which clearly supports sustainable growth.	
Reg18-E-057	London City Airport	Reg18-E-057/010	Transport	T5 Airport						<p><i>Not Justified</i></p> <p>The suggested prohibition on additional flights and other operational changes has not been justified. The airport has carefully reviewed the Council's draft plan and evidence base and can find no evidence to support such an approach, nor is there any consideration of any alternatives.</p>	A change to this policy approach has not been made. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.
Reg18-E-057	London City Airport	Reg18-E-057/011	Transport	T5 Airport						By contrast the airport master plan, which the Council must take into account as part of the Local Plan process, shows how the airport can grow sustainably up to 151,000 ATMs and 11 mppa. As the Council is aware, the draft master plan was	Comment noted, the Airport's masterplan has been given due consideration in the development of this policy.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										accompanied by an evidence base (technical reports) which demonstrated how growth to 11m ppa will create a significant uplift in jobs and other economic benefits whilst environmental impacts can be mitigated and are not significant.	
Reg18-E-057	London City Airport	Reg18-E-057/012	Transport	T5 Airport						The December 2022 planning application to revise some of the CADP conditions also provides evidence to show the acceptability of its current limit of 111,000 ATMs while accommodating an increase in annual passengers to 9 million and important changes to operating times on Saturday afternoon, which will unlock cleaner, quieter aircraft.	Comment noted.
Reg18-E-057	London City Airport	Reg18-E-057/013	Transport	T5 Airport					T5.2	No justification has been provided for the proposed moratorium on freight services either, nor on the use of the airport for helicopters or drones:	A change to the policy approach has not been made. It is considered that the use of the airport site for helicopters or drones, or development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes
Reg18-E-057	London City Airport	Reg18-E-057/014	Transport	T5 Airport					T5.2	<ul style="list-style-type: none"> <li>In fact, there may be scope for limited freight services or higher value smaller freight items to be carried in the holds of passenger aircraft, which could be of significant benefit to exporters or importers in Newham or the surrounding East London area. Ruling out the use of any spare capacity for flights which are already operating would be inefficient and is not justified.</li> </ul>	A change to the policy approach has not been made. It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/015	Transport	T5 Airport					T5.2	<ul style="list-style-type: none"> <li>Imposing a blanket restriction on helicopters or drones ignores future changes in technology which are already being trialled internationally and in the UK. Electric Vertical Take Off and Landing or eVTOL aircraft could revolutionise short distance journeys whilst being much quieter and cleaner than helicopters. It is important the policy does not preclude their potential use without justification. It is also noted that there are already limits on the type of aircraft and noise limits which ensure that impacts are no worse in future.</li> </ul>	A change to the policy approach has not been made. It is considered that the use of the airport site for helicopters or drones would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes
Reg18-E-057	London City Airport	Reg18-E-057/016	Transport	T5 Airport						<p>The airport is particularly concerned about unsubstantiated comments in the draft local plan which appear to have no evidential basis.</p> <p>For example, paragraph 3.282 of the draft Local Plan asserts that 'Residents have told us they do not support an increase in the number of flights (actual aircraft movements) or reduction in the extant respite period – especially in light of Newham's declaration of a Climate Emergency and Air Quality commitments.' However, there is no reference to such concerns in the 'Issues and Options Consultation Report (October-December 2021)' published alongside the draft regulation 18 Local Plan.</p>	Comment noted. Residents have communicated to the Council in a variety of forums that they do not support increase in the number of flights (actual aircraft movements) or reduction in the extant respite period. This includes comments received to the 2022 application, Citizen Assemblies, as well as responses to the Regulation 18 Local Plan consultation.
Reg18-E-057	London City Airport	Reg18-E-057/017	Transport	T5 Airport						Likewise, in the only transport-related document included in the Council's evidence base, "Newham Sustainable Transport Strategy – Baseline Assessment" (November 2022), there are unsubstantiated comments on pages 20 (paragraph 2.4.9) and 84 (paragraph 7.2) linking London City Airport with the poor air quality that is experienced by residents.	Comment noted. Residents have communicated to the Council in a variety of forums regarding air quality impacts from the Airport. This includes comments received to the 2022 application, Citizen Assemblies, as well as responses to the Regulation 18 Local Plan consultation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/018	Transport	T5 Airport						We also note that the reference on page 20 is to the Newham Council Corporate Plan 2022-2026 and the commitment to “campaign against” London City Airport expansion. In our view, it is not appropriate for this expression of the Council’s political position to feature in the evidence base for the Local Plan; it does not offer any objective justification for policy T5.	Comment noted.
Reg18-E-057	London City Airport	Reg18-E-057/019	Transport	T5 Airport						<p><i>Not effective</i></p> <p>Draft policy T5 takes a rigid stance on airport development and jumps to the conclusion that any changes to the use and function of the airport would cause an unacceptable increase in adverse impacts to local residents (draft implementation policy T5.2). The approach is not effective because:</p> <ul style="list-style-type: none"> <li>• It is inconsistent and incompatible with the Strategic Plan for London (the 2021 London Plan) which in Policy T8 (Aviation), whilst supporting the principle of role of airports strategic role in growth especially in Opportunity Areas (including LCY), adopts a criteria based approach to the consideration of airport development proposals. Such criteria requires there to be acceptable environmental and surface access impacts and does not preclude growth and other changes.</li> </ul>	This policy approach has now changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in Policy T5.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/020	Transport	T5 Airport					T5.2	[Draft policy T5 takes a rigid stance on airport development and jumps to the conclusion that any changes to the use and function of the airport would cause an unacceptable increase in adverse impacts to local residents (draft implementation policy T5.2). The approach is not effective because:] • The suggested prohibition on any increase in actual aircraft movements, ignores the fact that the airport’s permitted number of flights is already 111,000 ATMs. This will not change as part of the current December 2022 proposals to amend CADP. The airport’s master plan demonstrates how the airport’s noise footprint or contour is expected to continue to reduce as the aircraft fleet continues to become cleaner and quieter. The Government’s Jet Zero Strategy is also expected to accelerate such trends and it is important for development proposals at airports to be considered on a case-by-case basis in terms of their benefits when viewed against impacts. The December 2022 application clearly concludes that the proposals will not have any unmitigated negative impacts, instead it will deliver many clear and tangible benefits to Newham and its residents.	This policy approach has now changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in Policy T5.
Reg18-E-057	London City Airport	Reg18-E-057/021	Transport	T5 Airport				3.28 1		<i>Not consistent with National policy</i> A brief mention is made of national policy in paragraph 3.281. However, we note that the text erroneously refers to the national priority of “making better use” of existing runway capacity when in fact the Government’s priority is for airports to make “best use” of their existing runways across the whole of the UK.	A wording change to "best use" has been made. Please see the new wording in Justification T5.



Reg18-E-057	London City Airport	Reg18-E-057/022	Transport	T5 Airport					<p>Furthermore, the approach taken in draft policy T5 ignores key aspects of national policy, including:</p> <ul style="list-style-type: none"> <li>• Aviation Policy Framework (2013) (APF) – The APF acknowledges the aviation sector as a major contributor to the long-term economic growth of the UK. It also recognises the role airports have in ...creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area. The APF supports the growth of airports subject to a balance being struck between the benefits of aviation and the negative effects on climate change, noise and air quality. This balanced approach does not currently feature in policy T5. Paragraph 5.6 of the APF states that: In preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the Aviation Policy Framework, to the extent it is relevant to a particular local authority area, along with other relevant planning policy and guidance. As written, policy T5 appears to have no regard to the APF or any subsequent statement of Government policy on aviation, such as the Airports National Policy Statement, Beyond the Horizon, Flightpath to the Future or the Jet Zero Strategy.</li> <li>• Beyond the Horizon – Making best use of existing runways (2018) (MBU) – The MBU policy builds on the APF and reiterates the government’s support for the sustainable growth of airports by making the best use of existing runway capacity. It provides a clear policy statement on the respective roles of airport operators and local authorities when considering proposals for airport growth: ... any [airport] proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudice the decision of those authorities who</li> </ul>	<p>A change to the policy approach has been made, to make clear than some negative impacts could be mitigated. Please see the new wording in Policy T5. Both the Airport’s masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p>
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									<p>will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits. As currently worded, policy T5 allows no latitude for the objective assessment of any proposals in line with the MBU policy which emphasises that the environmental implications need to be balanced against the economic benefits.</p> <ul style="list-style-type: none"> <li>• Flightpath to the Future (2022) (FttF) – This document is the Government’s strategic framework for the aviation sector and deals directly with the growth of airports. It states that: ...the Government remains supportive of airport expansion where it can be delivered within our environmental obligations. The Government is supportive of airports bringing forward plans by way of our existing policy frameworks for airport planning. These policy frameworks are the APF and MBU policy documents referred to above. Policy T5 does not allow airport proposals to be brought forward in line with the government policy frameworks, therefore is at odds with the FttF policy.</li> </ul>	
Reg18-E-057	London City Airport	Reg18-E-057/023	Transport	T5 Airport					It is therefore clear that draft Policy T5 is unsound. Both the policy and supporting text must be redrafted so that it is positively prepared, justified, effective and consistent with national policy. The	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										supporting text and the implementation policies, in particular, require a completely revised approach. The annex sets out recommend changes to the policy and supporting text.	
Reg18-E-057	London City Airport	Reg18-E-057/037	Transport	T5 Airport						Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES <ul style="list-style-type: none"> <li>• Page/Policy: T5: Airport. P279</li> <li>• Current Wording: T5: Airport</li> <li>• Commentary: The policy heading should reflect the subject of the policy, namely London City Airport.</li> <li>• Suggested Change: T5: <del>Airport</del> <b>London City Airport</b></li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we desire policy titles to be succinct.
Reg18-E-057	London City Airport	Reg18-E-057/038	Transport	T5 Airport			T5.1			[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES] <ul style="list-style-type: none"> <li>• Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 1. Development at London City Airport that consolidates ancillary airport infrastructure will be supported, where this makes the most efficient use of land and creates land availability for other employment generating uses (such as industrial) that are suitable for close proximity to the airport.</li> <li>• Commentary: We support the principle of consolidating ancillary airport infrastructure especially where it frees up land for employment generating uses. However, we consider the types of uses could be more aspirational than industrial and could better align with Newham's employment and education aims.</li> <li>• Suggested Change: 1. Development at London City Airport that consolidates ancillary airport</li> </ul>	This policy approach has now changed to support local residents into airport and aviation related jobs. Please see the new wording in Policy T5.

<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	<p>infrastructure will be supported, where this makes the most efficient use of land and creates land availability for other employment generating uses (such as industrial) <b>that support job creation, including aviation related education opportunities and sustainable aviation research close to the airport.</b> <del>are suitable for close proximity to the airport.</del></p>
<p><b>Implementation</b></p>	
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/039	Transport	T5 Airport			T5.2			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 2. Development proposals at London City Airport which would result in an increase in adverse impacts to existing local residents and to development proposals for new homes will not be supported.</li> <li>• Commentary: The current wording has not been positively prepared, as it adopts a negative position on airport related development proposals without considering how impacts can be mitigated. This is also not a justified approach, given that the policy does not appear to have considered any proportionate evidence. It is also at odds with National policy guidance and the London Plan, which expects any airport application to demonstrate how it will mitigate against local environmental issues and anticipates that local authorities will give proper consideration to such applications.</li> <li>• Suggested Change: 2. Development proposals at London City Airport <del>which would result in an increase in adverse impacts to existing local residents and to development proposals for new homes will not be supported.</del> <b>shall demonstrate that all relevant considerations have been taken into account, including economic and environmental impacts and proposed mitigations, to ensure local residents do not experience significant adverse impacts and any surrounding site allocations are not unduly inhibited.</b></li> </ul>	The policy has been changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in Policy T5. Both the Airport's masterplan, national aviation policy and the London Plan have been given due consideration in the development of this policy. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/040	Transport	T5 Airport			T5.3			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 3. Development that facilitates the use of zero carbon technologies at the airport will be supported, where this does not adversely impact local residents.</li> <li>• Commentary: The airport strongly supports this policy which aligns with its recently published plans to become London’s first NetZero emissions airport. Minor amends suggested for flexibility.</li> <li>• Suggested Change: 3. Development that facilitates the <b>development or</b> use of <b>low and</b> zero carbon technologies at the airport will be supported, where this does not adversely impact local residents.</li> </ul>	This wording change has not been made, in light of the Council's commitments to achieve net zero by 2045, and London City Airport being a net zero carbon business by 2050. The Council supports future zero carbon technology, and does not wish to "bake in" unsustainable technology in the interim.
Reg18-E-057	London City Airport	Reg18-E-057/041	Transport	T5 Airport			T5.4			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Page/Policy: Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 4. Any development proposal must mitigate any impact on local residents, and additional works to further mitigate existing impacts for local residents is encouraged.</li> <li>• Commentary: This part of the policy can be superseded by the rewording of Part 2 (above). The second half of the sentence that states ‘additional works to further mitigate existing impacts’ is not justified or effective as any development proposal must offer mitigation in proportion to the impacts, therefore the policy cannot ask for ‘additional’ mitigation beyond what</li> </ul>	This policy approach has now changed to make clear that noise, vibration, smell and air quality impacts should be mitigated - and where negative impacts would be unacceptable even following mitigation, development would not be supported. Please see the new wording in Policy T5.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										is reasonably necessary and justified. • Suggested Change: Delete	
Reg18-E-057	London City Airport	Reg18-E-057/042	Transport	T5 Airport			T5.5			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 5. Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike. This could include: a. Development that reduces the level of car parking on site. b. Development that makes improvements to public transport access to the airport.</li> <li>• Commentary: The objective of improving sustainable access to the airport is generally supported, however the policy cannot require a reduction in existing or consented development, specifically a reduction in the level of car parking on site. However, the airport fully supports the principle of proportionately limiting any parking proposed in future to encourage and incentivise travel by sustainable modes.</li> <li>• Suggested Change: Development proposals</li> </ul>	The policy approach has not been changed, as a future development proposal could reduce the amount of car parking on site. The Council wishes to work with the airport to improve sustainable access to the airport. Travel Plans are considered elsewhere in the transport policies, and the scale of these would depend on the scale of the application.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference

~~should~~ **that** improve sustainable access to the airport-site for both airport passengers and staff alike **will be supported. Such improvements** could include (but not limited to): a. Development that ~~reduces~~ **does not increase** the level of car parking on site **beyond what has previously been consented**. b. Development that reduces level of car parking per passenger relative to any increases in passenger throughput. b. Development that **contributes towards** ~~makes~~ improvements to travel by sustainable and public transport modes to and from the airport. **c. Travel Plan initiatives delivered in consultation with the Council.**



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/043	Transport	T5 Airport			T5.6			<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Page/Policy: T5: Airport. P279</li> <li>• Current Wording: 6. Development should work with the Council to ensure that local residents are supported into airport and aviation related jobs.</li> <li>• Commentary: While the principle of airport and aviation related job creation is supported, such job creation is linked to growth which can only be delivered through development proposals. As set out in our consultation response, the current wording of policy T5 is opposed to any growth proposals and would therefore prevent the job creation sought in this paragraph. We support local job creation and suggest alternate wording.</li> <li>• Suggested Change: Delete and replace with: <b>Development proposals should set out how local residents can be provided with opportunities to gain airport and aviation related jobs, education and training.</b></li> </ul>	The policy has been clarified to make clear that the Council does not support dedicated freight planes using the airport, in light of the consequential rise in goods vehicle trips that would result from these flights.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/044	Transport	T5 Airport				3.28 2		<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: P279 Para. 3.282</li> <li>• Current Wording: 3.282 Residents have told us they do not support an increase in the number of flights (actual aircraft movements) or reduction in the extant respite period...</li> <li>• Commentary: It is not clear where the source of this statement can be found in the evidence base. Our recent public consultation exercises in support of our Master Plan (2019) and the CADP S73 application (2022) found that although there is some opposition to increased flights and reduction in respite periods, the responses were far more balanced, with support from businesses, airlines, passengers and indeed local residents. Feedback tended to highlight the importance of job creation, environmental mitigation including the transition to more cleaner, quieter, new generation aircraft, local transport improvements and improved community benefits</li> <li>• Suggested Change: Suggest either the evidence for this statement is referenced or the statement is deleted.</li> </ul>	This wording change has not been made. Residents have communicated to the Council in a variety of forums that they do not support increase in the number of flights (actual aircraft movements) or reduction in the extant respite period. This includes comments received to the 2022 application, Citizen Assemblies, as well as responses to the Regulation 18 Local Plan consultation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/045	Transport	T5 Airport				3.283		<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: P279 Para. 283</li> <li>• Current Wording: 3.283 ... The location of a major airport in a rapidly densifying part of central London is unique and careful land use management has ensured that current scale and nature of the airport, as secured in the City Airport Development Programme (CADP) Permission (13/01228/FUL) and associated conditions, is able to operate alongside this emerging context.</li> <li>• Commentary: This sentence gives the impression that the airport is only 'able to operate' within the current CADP limits and that any change to CADP would somehow not be possible due to proposals to densify the area. That is not the case as the airport's Master Plan clearly demonstrates how it can grow in a sustainable and responsible way while significantly contributing to Newham's future plans, including meeting it's housing targets while the airport continues to grow.</li> <li>• Suggested Change: Delete sentence.</li> </ul>	<p>The policy has been changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in Policy T5.</p> <p>The Airport's masterplan has been given due consideration in the development of this policy. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/046	Transport	T5 Airport				3.28 6		<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: P279 Para. 286</li> <li>• Current Wording: 3.286 Given the above, expansions in the size, function, operating hours and frequency of the airport activity is not supported. London City Airport has historically been a passenger focused site, with very small freight volumes. In light of this – the Council would not support freight planes using the airport or an increase in freight volumes on passenger aircraft, especially given the consequential rise in goods vehicle trips that would result from these flights. Nor are proposals to introduce helicopters and other noisy aerial uses such as commercial sized drones supported, in light of the adverse impacts to local residents and housing sites in close proximity to the airport.</li> <li>• Commentary: The first sentence in this paragraph effectively pre-judges any airport proposal without considering any associated environmental assessment or mitigation of the potential changes. This position is also at odds with national policy which expects local authorities to consider airport expansion proposals on their merits, taking into consideration the economic and environmental impacts, and the mitigation proposals. In terms of freight aircraft, the CADP consent contains robust conditions for the control of noise, hours of operation and a delivery and servicing plan. If a specific freighter aircraft type can be certified to operate from London City Airport and meet the stringent planning conditions</li> </ul>	<p>The policy has been changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in Policy T5.</p> <p>Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported.</p> <p>The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>attached to the CADP consent, the Council would have no reasonable justification to prevent this aircraft from operating. Freight that travels on passenger aircraft is an important economic supplement to airlines and has the ability to lower ticket prices and make new routes viable where passenger revenue alone would not. Further, air freight services could have a significant benefit to exporters or importers in Newham and could potentially generate new business opportunities. The Council does not have the power to control freight volumes on passenger aircraft within the existing airport infrastructure. Any proposal to increase freight infrastructure at the airport would be subject to a planning application which the Council would be required to assess on its merits.</p> <ul style="list-style-type: none"> <li>• Suggested Change: Delete and replace with:  <b>Given the above, any change to the current physical infrastructure and/or operating restrictions at London City Airport will be judged with careful consideration of the local impacts, taking into account the economic and environmental impacts. The Council is opposed to the introduction of noisier aircraft that do not meet the strict environmental conditions of the CADP consent but will support the airport in incentivising newer, quieter aircraft types that utilise the latest technologies.</b></li> </ul>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/047	Transport	T5 Airport					T5.1	<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Implementation T5.1 P279</li> <li>• Current Wording: Development should show how it will make the best use of the limited airport site, enabling land to be unlocked for other employment generating uses that are suitable for close proximity to the airport. This could include uses that support or complement the airport, such as laundry or catering. This should be demonstrated in a Design and Access Statement.</li> <li>• Commentary: The principle of unlocking land for employment generating uses is supported, however the wording should be more aspirational to meet both the airport's and Newham's employment and training objectives.</li> <li>• Suggested Change: Development should show how it will make the best use of the limited airport site, enabling land to be unlocked for other employment generating uses <del>that are suitable for close proximity to the airport.</del> This could include uses that support or complement the airport, such as <del>laundry or catering</del> <b>engineering, aviation related education and training, and sustainable technologies, including zero emissions flight and research and development of such technologies.</b> This should be demonstrated in a Design and Access Statement.</li> </ul>	This policy approach has now changed to remove examples of uses that support or complement the airport. Please see the new wording in Implementation T5. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as we wish to promote uses that are suitable for close proximity to the airport.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/048	Transport	T5 Airport					T5.2	<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Implementation T5.2 P280</li> <li>• Current Wording: It is considered that the following changes in the use and function of the airport would result in an unacceptable increase in adverse impacts to existing local residents and to development proposals for new homes: <ul style="list-style-type: none"> <li>• Development proposals which would increase the number of actual aircraft movements from the airport, or reduces the extant respite period.</li> <li>• Development that would enable the use of the airport site for helicopters or drones.</li> <li>• Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.</li> </ul> </li> <li>• Commentary: The text in this section pre-judges any future airport proposal and is at odds with national policy concerning what local authorities must consider when assessing any application for airport growth. Furthermore, the assertions in this section and the proposed restrictions on development at the airport lack any justification by reference to the evidence base.</li> <li>• Suggested Change: Delete paragraph and bullets.</li> </ul>	<p>The policy has been changed to make clear that airport development could occur that does not cause unacceptable negative impacts. Please see the new wording in T5.</p> <p>The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p> <p>It is considered that the use of the airport site for helicopters or drones, or development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/049	Transport	T5 Airport					T5.5	<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Implementation T5.5, P280</li> <li>• Current Wording: The Council does not require an Elizabeth line station at the airport to facilitate the levels of growth in the Royal Docks – however the Council would support a privately funded station to improve access to the airport site.</li> <li>• Commentary: The airport strongly support aspirations for a future Elizabeth Line Station in North Woolwich given the many benefits that would flow through the North Woolwich area including job creations; improved connectivity and associated economic benefits. Any new station would also better connect LCY to London’s public transport network. It is suggested that the Council also safeguard sufficient lands to allow for the future delivery of a new station, subject to detailed feasibility and funding. It is also suggested that further text is provided under N2: North Woolwich. This is specifically addressed below.</li> <li>• Suggested Change: <b>The Council would support a privately funded Elizabeth Line station to improve access to the North Woolwich area and better connect London City Airport for staff and passengers.</b></li> </ul>	Comment noted. Discussions with both Transport for London and our consultants working on our Sustainable Transport Strategy, concluded that a station is not necessary to support the levels of growth in the Royal Docks. We have therefore considered that safeguarding land for a station is not required.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-057	London City Airport	Reg18-E-057/050	Transport	T5 Airport					T5.6	<p>[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES]</p> <ul style="list-style-type: none"> <li>• Page/Policy: Implementation T5.6, P280</li> <li>• Current Wording: Development at the airport should liaise with the Council’s economic regeneration and Our Newham Work teams to ensure that local residents are supported into airport and aviation adjacent jobs. This should be demonstrated at the time of submission, with the quantity of local residents supported into airport jobs secured by condition.</li> <li>• Commentary: The principle of the text is supported however any condition attached to an airport related consent that specifies any number of local residents supported into airport jobs may not be possible or meet the test for conditions. The airport already has a legal agreement with the Council attached to the CADP consent that requires all onsite employers to use reasonable endeavours to ensure at least 40% of new recruits are from Newham and 70% from the local area. This is reported annually in the Airport’s Annual Performance Report.</li> <li>• Suggested Change: <del>Development at the airport</del> <b>Promoters of airport development</b> should liaise with the Council’s economic regeneration and Our Newham Work teams <b>at the earliest opportunity</b> to ensure that local residents are supported into airport and aviation adjacent jobs. This should be demonstrated at the time of submission <b>of any planning application</b>, <del>with the quantity of local residents supported into airport jobs secured by condition.</del></li> </ul>	The policy approach has been changed, please see the new wording in Implementation T5.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-059	Newham Cyclists	Reg18-E-059/009	Transport	T5 Airport						NC believe that London City Airport (LCA) should be mandated to have a Sustainable Transport and Travel Plan that focused on visitors, passengers and employees to and from the airport as well as in airport logistics services provision.	Comment noted, we note that London City Airport have a Travel Plan in place following the CADP permission. A future application at the airport site may also have a Travel Plan, depending on the scale of development.
Reg18-E-059	Newham Cyclists	Reg18-E-059/010	Transport	T5 Airport						A LCA Active Travel (i.e. walking and cycling) strategy plan should be properly integrated or connected into the local sustainable transport especially the nearby upcoming Royal Docks Corridor Active Travel infrastructure.	The policy approach has not changed, as we did not consider it necessary in light of Policy T3 which requires travel plans proportionate to the scale of development.
Reg18-E-002	Resident	Reg18-E-002/035	Transport	T5 Airport						not extend City airport. Unfortunately this does not take into account the other airport traffic, the majority of which is Heathrow	Comment noted, noting that Newham does not set national aviation policy.
Reg18-T-126	Resident	Reg18-T-126/029	Transport	T5 Airport						[Keep it]	Support noted.
Reg18-T-011	Resident	Reg18-T-011/025	Transport	T5 Airport						[Keep it] I welcome and applaud the council's position on this.	Support noted.
Reg18-T-019	Resident	Reg18-T-019/024	Transport	T5 Airport						[Add to it] To give us monetn	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan.
Reg18-T-072	Resident	Reg18-T-072/025	Transport	T5 Airport						[Add to it] All airport facilities should be safe and clean, easy access for everyone.	Support noted.
Reg18-T-078	Resident	Reg18-T-078/005	Transport	T5 Airport						[Keep it]	Support noted.
Reg18-T-086	Resident	Reg18-T-086/009	Transport	T5 Airport						[Change it] Less noise	Concerns regarding noise at the airport are noted. The Council maintains a stringent monitoring process to ensure that the airport complies with conditions of its planning permission.
Reg18-T-088	Resident	Reg18-T-088/026	Transport	T5 Airport						[Change it] Should be one train go from Newham to GATWICK, HEATHROW or STANSTED airport, if Mayor can do that this is big achievement, because private cabs charged too much and poor traveller have no choice to pay extra to them.	Comment noted, your desire for better transport connections between airports has been passed to Transport for London.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/027	Transport	T5 Airport						[Change it] Better connections to airport	Comment noted, the policy supports improved connections to/from the airport.
Reg18-T-063	Student	Reg18-T-063/014	Transport	T5 Airport						[Keep it]	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/057	Transport	T5 Airport						We support the requirement that 'Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike' and that this should include reductions in car parking and improved public transport access.	Comment noted, the policy supports improved connections to/from the airport as well as reduction in the level of car parking at the airport.
Reg18-E-095	Transport for London	Reg18-E-095/058	Transport	T5 Airport					T5.5	It would be helpful for the core policy refer to active travel improvements as mentioned in T5.5.	This wording change has been made. Please see the new wording in Implementation T5.
Reg18-E-095	Transport for London	Reg18-E-095/059	Transport	T5 Airport					Planning Obligations	These requirements should be confirmed in the Planning Obligations section. [active travel improvements mentioned in T5.5]	This wording change has been made. Please see the new wording in Planning Obligations T5.
Reg18-T-059	Travels in borough daily	Reg18-T-059/007	Transport	T5 Airport						[Add to it] It's difficult to get to the airport from the east. Some time ago there was talk of a DLR extension and/or bridge from Barking. This should be explored again.	Comment noted, your desire for better transport connections towards the east (including Barking) have been passed to Transport for London.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/015	Building a Fairer Newham	BFN4 Developer contributions and infrastructure delivery						[Lower Roding Crossing] LBBB are currently seeking funding to develop a study to help take this forward, and we are keen to collaborate with LBN as this progresses	Comment noted. The Sustainable Transport Strategy considers how transport infrastructure will support the level of growth in the borough, and what interventions are required to support this - including the Lower Roding Crossing.
Reg18-T-058	Resident	Reg18-T-058/027	Community Facilities	CF2 New and re-provided community facilities					Transport - Emailed Jsc agreed	more better crossing,	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help regarding improved crossings. 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-T-002	Resident	Reg18-T-002/055	High Street	HS2 Managing New and Existing Town and Local Centres						[Change it] We need [healthy food shops, cafes, restaurants, more greenery,] quality segregated cycle lanes, [more greenery etc]	Comment noted. The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.

Reg18-K-047	Resident	Reg18-K-047/002	Vision and objectives	Key diagram						[key diagram] Connectivity improvements needed between North Woolwich and Silvertown/Canning Town and North Woolwich and Beckton Riverside, especially for pedestrians and cycle users - notably Factory Road and an alternative to Sir Steve Redgrave Bridge (or rather an alternative to the Bascule Bridge section on the approach to SSR Bridge which has narrow pavements and no cycle provision, with double solid white lines on the road which drivers ignore overtaking cyclists on the corner)	This change has not been made. We did not consider this change to be necessary as the Sustainable Transport Strategy considers transport improvements generally in the borough. An express bus route connecting North Woolwich, Gallions Reach, Barking and beyond will enter service in 2024. The Sustainable Transport Strategy also considers improvements to walking and cycling in the Royal Docks.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/011	Neighbourhoods	N1 Gallions Reach						[Regarding the individual neighbourhoods set out in the draft Plan, we have particular interest in]....and N1 Gallions Reach as bordering areas with residential site allocations proposed	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-Ac-001	Canning Town and Custom House Assembly	Reg18-Ac-001/012	Neighbourhoods	N5 Canning Town and Custom House						[Change] Pavement park[ing] an absolute curse in the area, damaging paths and blocking access	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help with this issue.</p> <p>Good and safe footways are important for pedestrians. We try to keep our footways, clean, clear of obstructions and safe for all our residents and visitors.</p> <p>Parking is not allowed on footways or footpaths, pavements or grass verges – unless specifically exempted. Our parking enforcement officers can issue a Penalty Charge Notice (PCN) to vehicles parked in contravention or parked dangerously.</p> <p>You can report a problem vehicle on our website here. <a href="https://www.newham.gov.uk/parking-permits/parking-enforcement-fines">https://www.newham.gov.uk/parking-permits/parking-enforcement-fines</a></p> <p>We have provided the parking enforcement team with your comments</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-Ac-001	Canning Town and Custom House Assembly	Reg18-Ac-001/140	Neighbourhoods	N5 Canning Town and Custom House						[Add] Tower Hamlets offer transferable parking permits	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Parking department are able to help. We have also provided them with your comments.
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/001	General	N11 Beckton	New Site					Iceni Projects Limited ('Iceni') has been appointed by Beckton Alp Real Estate Ltd ('BAREL') to submit representations and comment on the current London Borough of Newham ('LBN') Regulation 18 Draft Local Plan for Consultation (December 2022).	Comment noted.
Reg18-Ag-001	Green Street Assembly	Reg18-Ag-001/047	Neighbourhoods	N12 East Ham South						[Change] Parking restriction should change to 9 to 5 pm	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the parking department are able to help. We have also provided them with your comments.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/010	Neighbourhoods	N13 East Ham						Regarding the individual neighbourhoods set out in the draft Plan, we have particular interest in N13 East Ham...as bordering areas with residential site allocations proposed	Comment noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/102	Transport							10. TRANSPORT a. Please share any feedback you have with us. No comment.	Comment noted.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/005	Transport							Sustainable Travel and Connectivity On transport and connectivity, we would like to continue to work with you as the draft Newham Local Plan progresses to ensure appropriate transport	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										infrastructure and connectivity between the London Borough of Newham and the London Borough of Barking and Dagenham.	
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/009	Transport							[We would also find it helpful to have more detail/evidence on] This is also the case for how the new developments may impact the A13	Comment noted.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/012	Transport							It would be helpful to know if LBN's assessments have indicated any strains on transport infrastructure that may impact our Borough, and particularly key connecting junctions such as the A406 roundabout which already currently faces queues and delays. We would welcome further discussions with you to find a solution that would improve smooth transit between the two boroughs. On Gallions Reach more specifically, we continue to support the proposed additional connection between the two boroughs in the form of a bridge over the River Roding. LBBD are currently seeking funding to develop a study to help take this forward, and we are keen to collaborate with LBN as this progresses.	Comment noted. The Sustainable Transport Strategy considers how transport infrastructure will support the level of growth in the borough, and what interventions are required to support this.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/016	Transport							We note the challenge of ensuring both good placemaking and smooth transit through the area in relation to the placement of the bridge and the Beckton Sewage Treatment Works	Comment noted.
Reg18-E-143	Canal and River Trust	Reg18-E-143/005	Transport							We note a Sustainable Transport Study is underway, which we hope will also include the towpath and the waterway as sustainable transport corridors (including for waterborne freight, as referenced in the LLDC Local Plan Policy T.10: Using the waterways for transport", above).	Comment noted. The Sustainable Transport Strategy considered the use of towpaths and waterways during its development.



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Reg18-E-143	Canal and River Trust	Reg18-E-143/016	Transport							<p>Page 269 - Transport</p> <p>As referred to above, LLDC Local Plan Policy T.10 could be repeated in the Newham Local Plan:</p> <p>Using the waterways for transport The Legacy Corporation will encourage and support the use of the waterways for passenger and freight transport and leisure uses, taking into account any impact on biodiversity and drainage functions. Where appropriate, the Legacy Corporation will require development proposals to provide new or improved access to the waterways, and improvements to towpaths and footpaths, and facilitate the introduction of moorings and other waterway-related infrastructure where these do not compromise the other functions of those waterways.</p> <p>Cross-reference to policies: BN.1; BN.2 London Plan policies: 7.25; 7.26.</p>	This wording change has not been made. We did not consider this change to be appropriate as we wish to word the policy specifically without copying the LLDC plan. However, the policy has changed as to support the use of waterways throughout the transport policies.
Reg18-E-133	Climate You Change	Reg18-E-133/184	Transport							<p>General comment regarding road closures: Could Newham Council set up occasional car free days, to encourage a different way of thinking about car usage. (Ethiopia has held car free Sundays for a number of years. After initial resistance these then became popular, leading to calls for once a week in the capital! They are now held in other African countries.)</p>	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/185	Transport							<p>[car free day] As with Ethiopia it could be made a social, community experience, benefitting mental health, with outdoor exercise activities (weather permitting!), encouraging increased walking, jogging and cycling, alongside a program of community engagement, designed to change attitudes to car driving</p>	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department 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-133	Climate You Change	Reg18-E-133/186	Transport							There would however be many other benefits to residents. Activities such as speed walking with pushchairs could help engage a number of different people from our communities and help different people find something for them.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/187	Transport							Residents could be encouraged to have activities and stands, to help create a bigger buzz around the initiative. Residents providing and sharing food, drink, music, plus games for children could all help with community engagement. Car free days could complement an increase in Safer Streets Play Schemes.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/188	Transport							These activities could help residents with the cost of living whilst being sustainable...jumble sales, clothes swaps, cycle repair, teaching repair of other items/clothes. This could work in tandem with community summer jumble trails. Community groups and those with relevant skills could be asked to give demos on preparing and using waste, plus plant-based food.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/189	General							One great activity to work on changing attitudes to driving and to help bring communities together could be to hold a summer street parade across the borough.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-E-040	CPRE	Reg18-E-040/031	Transport							ROADS – unnecessary large and complex road layouts are taking up very large amounts of space: a policy should be introduced to reduce road space and reallocate it to more sustainable uses	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-040	CPRE	Reg18-E-040/042	Transport							Kerbside space in Newham is likely to take up over 200 football pitches worth of space – mostly public space – and, as such, a policy should be included in the Local Plan addressing how it is used.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.
Reg18-E-040	CPRE	Reg18-E-040/043	Transport							A Kerbside Space policy should be introduced.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.
Reg18-E-040	CPRE	Reg18-E-040/044	Transport							A huge amount of land is currently deployed as kerbside space – used mainly for parking private cars.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses.
Reg18-E-040	CPRE	Reg18-E-040/045	Transport							Given the London Mayor's Transport Strategy needs to underpin the Newham Local Plan, a policy should be included which recognised the importance of reallocating this space for sustainable uses which support both active travel and environment goals.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.
Reg18-E-040	CPRE	Reg18-E-040/046	Transport				T2.			[Kerbside Strategy - use kerbside space for] bus and cycle lanes	<p>The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.</p> <p>The Sustainable Transport Strategy considers how bus and cycle lanes can be delivered in the borough.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-040	CPRE	Reg18-E-040/048	Transport							[Kerbside Strategy - use kerbside space for] , shared mobility parking,	<p>The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.</p> <p>The Sustainable Transport Strategy considers how car clubs can be rolled out across the borough.</p>
Reg18-E-040	CPRE	Reg18-E-040/049	Transport							[Kerbside Strategy - use kerbside space for] delivery hubs	<p>The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.</p> <p>The Sustainable Transport Strategy considers how delivery and servicing can be improved across the borough, including with delivery hubs.</p>
Reg18-E-040	CPRE	Reg18-E-040/054	Transport							[Kerbside Strategy - use kerbside space for] supporting delivery hubs and shared mobility hubs (car share, bike share etc).	<p>The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.</p> <p>The Sustainable Transport Strategy considers how delivery and servicing can be improved across the borough, including with delivery hubs - and how car clubs can be rolled out across the borough.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-040	CPRE	Reg18-E-040/055	Transport							Specifically, a policy should be included for reallocation of a minimum of 25% of Newham's kerbside, referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in Highways and Parking department control the public highway. We have also provided them with your comments.
Reg18-E-040	CPRE	Reg18-E-040/082	Transport							[Housing estates, infill development and reconfiguring car-parking provision on estates] ;and that 'grey space' (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space.	Comment noted. The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including for greenery).
Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/012	Transport							The Policies Map is meant to show the spatial incidence of policies. It should be capable of being used by potential developers and by development managers in consideration of applications to try to ascertain the effect of the plan on a particular piece of land. If a spatially applicable policy or proposal is not shown on the Policies Map then its effectiveness and hence, the effectiveness of the plan, is likely to be compromised. As the Policies Map currently stands it would fail to provide any understanding of the location and full policy protection (SIL, Waste Site and Safeguarded Rail Freight Site) which should be afforded to the Bow East Goods Yard Site.	This wording change has been made. Please see the new wording in Policy T1 Strategic Transport that supports the safeguarding of strategic rail heads.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/073	General							[Add] Parking zones are limiting (2h a month to park outside of my zone is not enough) [East Ham]	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the parking department 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-097	Lee Valley Regional Park Authority	Reg18-E-097/036	Transport							Given the transition of planning powers from the LLDC back to Newham Council it will be important to ensure policy in the Local Plan assists in the safeguarding routes for spectator access as designated safe pedestrian routes, between these public transport hubs and major venues or event spaces such as the Lee Valley VeloPark. As previously stated major development and the associated closure of roads during construction can disrupt key pedestrian routes (such as the Last Mile from Stratford through to the VeloPark).	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested, as we do not control the public highway. Our colleagues in the Sustainable Transport and Highways department are able to help regarding this. We have also provided them with your comments.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/065	Transport				T3.1			More zip cars	Comment noted. The Local Plan supports greater provision of car clubs across the borough.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/078	Transport							It you want to encourage cycling make the bikes have working lights. Bikes without lights going against the traffic on one way roads are deaths waiting to happen	Comment noted. The Sustainable Transport Strategy and the Local Plan both support improvements to cycling in Newham.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/081	Transport							Transport - environmental impacts of transport	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. The Transport policies aim to improve the quality of the environment through increased walking and cycling, use of public transport and a reduction in car dominance.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/082	Transport							Transport - car speeding issue	<p>The detection, prevention and investigation of criminal offences (such as speeding) is within the remit of the Metropolitan Police Service.</p> <p>The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. We also want people to feel more comfortable walking and cycling on Newham's streets. Newham Council is planning to introduce a 20mph speed limit on most streets across the borough.</p> <p>Lower speed limits can help to reduce the number of traffic collisions, reduce the likelihood of serious injuries in collisions, especially for pedestrians, reduce noise and pollution from motor traffic, and encourage people to walk and cycle more.</p> <p>Physical measures or traffic calming measures such as road humps or speed cushions will be considered for streets or areas where speeding is occurring frequently.</p> <p>Before implementing any physical measures, informal consultations with residents and businesses as well as statutory consultations will be carried out.</p> <p>We have provided the highways team with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/085	Transport							Improved cycling routes	The Sustainable Transport Strategy outlines how new, high quality cycle routes will be delivered across the borough. The Local Plan will support this through new development.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/088	Transport							From these post it grievances I think the residents could do with a session telling us how you plan to deal with these and not just about future building plans	Comment noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/089	Transport							Temporary car parks	Unfortunately, it was not clear what change you wanted to make to this part of the Plan.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/112	Transport							Mini roundabout - impossible to cross the road	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help regarding improved crossings. We have also provided them with your comments.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/018	Transport							Transport T1 - T5 As mentioned in our response to the Issues and Options consultation, Waltham Forest are in agreement with the approach taken by Newham to address the topic of Transport in the Draft Newham Local Plan and support the policy approach taken. The London Borough of Waltham Forest are committed to supporting Newham wherever possible on cross-boundary transport matters and schemes that help both councils realise their policy objectives and transport aspirations of promoting and improving access to sustainable and active modes of transport; especially encouraging walking and cycling and reducing motor vehicle dependency.	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-057/035	Transport						T1.1 and T5.7	Other matters  The airport welcomes the acknowledgement in the draft Local Plan of airport safeguarding and the recognition that there is a need to consult the airport on such matters. The airport would welcome further discussions in respect of policies T1.1 and T5.7 and the proposals map which relate to the airport's Public Safety Zone (PSZ). The PSZ is currently being revised and this will need to be reflected in the final version of the proposals map which currently shows the 2010 PSZ.	Comment noted, we await further information regarding the PSZ.
Reg18-E-016	National Highways	Reg18-E-016/001	Transport							National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/002	Transport							In relation to Newham, the closest section of our network comprises the M11 J4, that sits within Redbridge, followed by the point of our ownership of the A13 at Wennington that leads to the M25 at J30. Based on our long term responsibility for the operation of our network we provide the following comments.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-016	National Highways	Reg18-E-016/004	Transport							National Highways will work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. When consulted we will review and provide comments on planning applications that have the potential to affect any part of our network.	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/005	Transport							We note there is limited information available relevant to National Highways at this stage. Section T2.3 states “[...]. Depending on the size, scale and nature of development, this may include submission of air quality impact assessments, Transport Assessment and Travel Plans”.	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/006	Transport							Any proposed development should prioritise active, efficient, and sustainable transport choices	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/008	Transport							For National Highways, it is measures such as public transport enhancements i.e. bus, underground, rail or improved integration of these services that would realistically affect the number of vehicle trips that would otherwise travel on our network	Comment noted.
Reg18-E-016	National Highways	Reg18-E-016/009	Transport							However, we recognise the continuing need for journeys on the national strategic highway network for both commercial and private purposes. It is for this reason that we encourage production of a cumulative impact assessment for local plans that considers impacts on the strategic as well as local network.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-016	National Highways	Reg18-E-016/014	Transport							We have undertaken a review of the Newham Draft Local Plan (Regulation 18) which helps identify and maximise the development potential of the area and we look forward to continuing to participate in discussion and consultations as the Plan, and evidence to support it, are developed. It should be ensured that any forthcoming development that may have the potential to impact upon our network is accompanied by a robust transport assessment or similar, to identify what traffic impacts the development site(s) would have on our network, and mitigation measures put forward to accommodate this.	Comment noted.
Reg18-E-144	Natural England	Reg18-E-144/033	Transport							[4. Other Advice Wider environmental gains] • Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.	Comment noted. The Local Plan Policy T2 supports the delivery of new strategic walking routes identified in the Sustainable Transport Strategy, including the Thames Path, Leaway and River Roding Way. Other evidence base such as the Green and Water Spaces Strategy consider missing links and improving access to greenspace.
Reg18-E-089	Newham New Deal Partnership	Reg18-E-089/002a	Neighbourhoods							1.Newham NDP is disappointed, given high rates of disability in Newham and a growing older population over the plan period, that there are no figures or ratio guidance for the provision of blue badges [or public toilets] in the plan, or an identifiable process for targets for these to be included in each of the local neighbourhoods.	Comment noted. Provision of individual blue badges is determined by Government, not through the Local Plan. The Local Plan therefore does not set a target for blue badges, noting that the new development will follow London Plan guidance for blue badge parking provision.
Reg18-Ap-001	Plaistow Assembly	Reg18-Ap-001/117	Transport							[Add] Improvement on travelling in borough	Comment noted. The Sustainable Transport Strategy outlines how improvements to transport will be delivered across the borough. The Local Plan will support this through new development.
Reg18-E-027	Resident	Reg18-E-027/032	Transport							I strongly support the draft transport policy and its objectives. I strongly agree that we must reduce	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										car use, and increase walking and cycling, and also public transport for longer journeys.	
Reg18-E-066	Resident	Reg18-E-066/005	Transport							4. Finally I saw in the Manor Park section on the local plan a comment made by R. Stewart that she'd struggled to get some trees planted that she was given grants for in the Community Assembly. I believe this is caused but the difficulty of finding suitable spots on pavements (I've had similar issues). Might I suggest that a tree / flower border can be positioned on the road instead replacing the area of one parked car. I believe this approach to tree planting is already happening in other boroughs.	The Local Plan aims to maximise opportunities for urban greening including street trees, as per Policy GWS4. However, it cannot deliver the change you requested. Our colleagues in the Highways department are able to help, as replacing parking spaces with planting or street trees would be a highways matter. We have provided them with your comments.
Reg18-E-087	Resident	Reg18-E-087/013	Transport							The documents says all new housing will be car-free. But what about disabled parking? Not all disabled people can use mobility scooters, or access public transport – are they to remain locked in their homes? This omission needs addressing.	Comment noted. New development will have standards for accessible parking (blue badge spaces) separate from other parking requirements, with disabled people or people with mobility impairments able to use them.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-085	Resident	Reg18-E-085/001	Transport							I would like to suggest that we have speed bumps/ or anything that will slow down the speeding of electric bikes/scooters/motorbikes/unicycles along the Greenway	<p>The detection, prevention and investigation of criminal offences (such as speeding) is within the remit of the Metropolitan Police Service.</p> <p>The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. We also want people to feel more comfortable walking and cycling on Newham's streets. Newham Council is planning to introduce a 20mph speed limit on most streets across the borough.</p> <p>Lower speed limits can help to reduce the number of traffic collisions, reduce the likelihood of serious injuries in collisions, especially for pedestrians, reduce noise and pollution from motor traffic, and encourage people to walk and cycle more.</p> <p>Physical measures or traffic calming measures such as road humps or speed cushions will be considered for streets or areas where speeding is occurring frequently.</p> <p>Before implementing any physical measures, informal consultations with residents and businesses as well as statutory consultations will be carried out.</p> <p>We have provided the highways team with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-085	Resident	Reg18-E-085/002	Transport							<p>This would ensure the safety of all who are using the Greenway such as Dog walkers, walkers especially the elderly</p>	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan.</p> <p>However The Local Plan cannot deliver the change you have requested. The Council's Community Safety department regularly collect and review data around ASB in the borough, responding to hotspot locations through targeted and focused operations in conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.</p>
Reg18-E-098	Resident	Reg18-E-098/044b	Design							<p>[...] and all future crossovers should be forbidden using both Planning and Highways powers.</p>	<p>This wording change has been made. Please see the new wording in T3.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/049	General							There should be a creative use of the Landlord Licencing Scheme, including better enforcement, to support Plan policies and in particular around improved internal and external standards of design, appearance, community safety, energy efficiency, amenity, front garden appearance and rubbish disposal arrangements.	The Local Plan addresses this topic through the transport policies However it cannot deliver the change you have requested. Our colleagues in Private Sector Housing department are able to help. We have also provided them with your comments.
Reg18-E-098	Resident	Reg18-E-098/062	General							There should be proper consultation on environmental matters as set out in the 2022 Manifesto--not the sham process now taking place around LTNs	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>Consideration of an LTN in the borough involves extensive data collection and consideration of feedback from local residents and businesses. The Council also consults with statutory stakeholders (London Ambulance Service, Met Police, London Fire Brigade and others).</p> <p>If the Council decides to proceed with an experimental scheme, we install temporary modal filters. During this stage, we gather traffic and air quality data to measure the impact of the low traffic neighbourhood. We also collect feedback to help us decide whether or not to make the scheme permanent.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-104	Resident	Reg18-E-104/024	Transport					3.250		Paragraph 3.250 should be re written to have an appropriate linkage to the need to reduce inactivity and sedentary lifestyles, noting that the Council's statutory health scrutiny functions made the following 2022 recommendation: "The Executive to create a programme of work which is led by Public Health to drive across the council the need to embed and entrench the addressing of health inequalities in all services, such as planning, housing, highways and environment teams."	This wording change has been made. Please see the new wording in T3.
Reg18-E-104	Resident	Reg18-E-104/025	Transport							Reference to tackling obesity is insufficient. Tackling obesity is a worthy aspect of public policy, but is not the same as ensuring the planning system does not embed the sedentary and inactivity timebomb in public health.	This wording change has been made. Please see the new wording in T3.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-139	Resident	Reg18-E-139/028	Vision and objectives							<p>However the plan does not develop many ideas in response to high profile news items about womens safety in particular. One planning related issue is the lack of 15 minute drop off and pick up bays near transport hubs for taxi's and private cars. My daughter has been followed down East Ham high street when traveling back in the evening. The bias against car use should not increase the difficulties of making journeys safe.</p>	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Polices D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan.</p> <p>However The Local Plan cannot deliver the change you have requested. These offences are investigated by the Police. However, Community Safety do work in partnership with the Police and other Council departments to tackle and reduce crime and ASB in the hotspot locations around the Borough. Whilst the Council are unable to task Police officers, we can through our partnership work request and recommend patrols in a particular location, should there be justifiable grounds. We have also provided the Community Safety Enforcement department with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-003	Resident	Reg18-K-003/018	Transport			3.249				The roundabout by the North Circular and Barking Road is very dangerous, and hard to cross with small children. I would like to do my supermarket shop in Barking - it's a 15 minute walk for me, but it's not safe.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help. We have also provided them with your comments.
Reg18-T-012	Resident	Reg18-T-012/011	Introduction							[Please provide any comments and feedback on the *Introduction*.] Why Newham Council does not inform its residents that the lithium-ion battery-powered vehicles (used in e-cars) have a total "carbon footprint" worse than diesel autos when the effects of mining lithium and producing all parts are included?	Comment noted. Evidence shows that this is not the case - Electric vehicles typically have a smaller carbon footprint than cars powered by petrol or diesel cars, even when accounting for the electricity used for charging.
Reg18-T-022	Resident	Reg18-T-022/002	Introduction							[Please provide any comments and feedback on the *Introduction*.] I do not see how taking longer routes to avoid going through traffic gateways on the main streets will help to fight climate change emergency by spending more time on the road burning more fuel to reach out my work place and come back home.	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property.</p> <p>Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team 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-034/005	Introduction							[Please provide any comments and feedback on the *Introduction*.] Future road developments should be appropriately balanced to promote cycle and pedestrian use.	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.
Reg18-T-058	Resident	Reg18-T-058/006	Introduction							[Please provide any comments and feedback on the *Introduction*.] more better crossing to cross the road.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help regarding improved crossings. We have also provided them with your comments.
Reg18-T-058	Resident	Reg18-T-058/012	All about Newham							[Please provide any comments and feedback on *Section 1: All about Newham*.] more better crossing.	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help regarding improved crossings. 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-T-101	Resident	Reg18-T-101/001	Introduction							<p>I am writing to lobby your support in getting our views as residents on the above issue heard. Many of us residents have only this week found out about plans to implement a LTN scheme, that will close off Hampton Road exit on to Romford Road, close both entry and exit onto Balmoral Road from Romford Road and also close off Balmoral junction with Sebert Road, partitioning this side and closing us in and reduce our only exit via Woodgrange Road for ALL journeys outside the Woodgrange Estate.</p> <p>Having spoken to residents of Windsor Road, Claremont Road, Osborne Road, Hampton Road together with businesses and services users of the Forest Gate Mosque, Claremont Clinic and other businesses such as the Car Wash and Car Care 4U, the car repair garage on Hampton Road, we are very concerned and alarmed by the prospect of the plans being implemented and would like to object to these plans. I myself am resident and live on Hampton Road and run a small business locally too We note there is a survey live to give feedback and share our views, although we have concerns with the fitness of this for the purpose intended for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Majority of residents or businesses we have spoken to don't know about the plans, nor the survey. So you cannot gauge true opinion, as if no-one knows about it, no one has a prompt to respond.</li> <li>2. The form is complicated and DOES NOT provide confirmation if the response has been logged to the respondent</li> <li>3. Many residents will be automatically excluded</li> </ol>	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property.</p> <p>Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>either due to their inability to fill in this complex online form or their language barrier, recognizing the diverse community such as</p> <p>How can we work together on this to ensure that our objections to these proposals are taken seriously and that a large section of the community and their views are not ignored on the basis they missed the memo.</p> <p>The consequences of these plan will prey heavily on our daily lives, where compounded by the crises of Energy prices, Fuel prices, Cost of Living &amp; Bank of England base rate rises impacting mortgages/housing costs. People need to be able to move freely to go to jobs, work extra hours, work their businesses more than ever to ensure they stay on top of the times we live in, not spend more time in congestion, traffic trying to get in and out of the area they live in and call home.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-116	Resident	Reg18-T-116/021	Transport							[Please share any feedback you have with us.] Lastly, a walking tunnel to go Greenwich park would be a good idea to get there easier faster and cheaper but I did not read anything relevant I think.	This wording change has not been made. We did not consider this change to be necessary as connections to Greenwich Park from Newham are best served by the DLR.
Reg18-T-119	Resident	Reg18-T-119/001	Introduction							[Please provide any comments and feedback on the *Introduction*.] This plan doesn't help people who have a car and need to get somewhere, safely, in minimal time or those who cannot walk and need to use transport. With the cost of living and petrol, you're making people who live on the corner near balmoral road go all the way down woodgrange road, which is already heavily congested to get to their homes.	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested. All properties remain accessible by car. Residents may have to take a slightly different route to get from the main road to their property.</p> <p>Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page:  <a href="https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood">https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood</a></p> <p>We have provided the highways team with your comments.</p>
Reg18-T-119	Resident	Reg18-T-119/002	Introduction							[Please provide any comments and feedback on the *Introduction*.] You can encourage walking by offering more walking activities for residents rather than taking something away from existing residents	Comment noted. The Local Plan and the Sustainable Transport Strategy both work to improve existing walking routes, and provide new walking connections and routes.
Reg18-E-017	Rt Hon Sir Stephen Timms MP	Reg18-E-017/001	Transport							I welcome the commitment to improved provision for cycling.	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-069/038	Transport							<p>F) Sustainable Transport Strategy This representation is written in the absence of the Sustainable Transport Strategy. The Sustainable Transport Strategy is a joint piece of work between the Planning Policy and Highways and Sustainable Transport service and currently underway. This work also includes a Cycling Strategy, Walking Strategy, Cycle Hire Strategy and Electric Vehicle Charging Point Strategy.</p> <p>The representations on the Local Plan Transport Chapter and Sustainable Transport Strategy Baseline Strategy are provisional pending a review of the final Transport Strategy document. The SHL are concerned of the multiple references to Sustainable Transport Strategy throughout the chapter as the document is not yet reviewed and published. The consultation period for consideration of the Local Plan should be extended to ensure that both the policy and the detail within the Transport Strategy can be assessed together.</p> <p>i - Newham Local Plan Review – Transport Chapter</p> <p>General</p> <p>The chapter references the Sustainable Transport Strategy in multiple places in the Draft Local Plan. Examples of mentions include:</p> <ul style="list-style-type: none"> <li>• Applicants should demonstrate consideration of local cycle hire, following the recommendations in the Sustainable Transport Strategy. (Policy T2.2)</li> <li>• The Council’s Car Club Strategy and the Sustainable Transport Strategy outlines the</li> </ul>	Comment noted. The Sustainable Transport Strategy will contain modelling and recommendations for transport improvements in the borough, having undergone a period of a public consultation in early 2024.

<b>Comment Response</b>	
<b>Comment</b>	<p>preferred approach towards car clubs, and the level of support required. (Policy T3.1)</p> <ul style="list-style-type: none"> <li>• The Sustainable Transport Strategy outlines that a minimum of five per cent of cycle parking should be dedicated to larger non-standard cycle parking. (Policy T3.3)</li> </ul>
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/045	Transport							<p>ii - Sustainable Transport Strategy: Baseline Assessment</p> <p>General</p> <p>The assessment collected evidence for a baseline assessment, which serves as a good base for community engagements that are currently being conducted. However, it is noted that it has not made any projections or undertaken any modelling for future scenarios. This would be a crucial piece of evidence and a strong justification for actions to be taken and policies to be designed for.</p>	Comment noted. The Sustainable Transport Strategy will contain modelling and recommendations for transport improvements in the borough, having undergone a period of a public consultation in early 2024.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/158	Transport							The Berkeley Group agrees that high quality, sustainable transport is key to delivering many of Newham's objectives and wishes to support Newham where they can in ensuring all of their development sites deliver and encourage methods of high quality, sustainable transport.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/139	General							[Add] Remove parking that is half pavement + half road	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested. Our colleagues in the Highways department are able to help with this issue.</p> <p>Good and safe footways are important for pedestrians. We try to keep our footways, clean, clear of obstructions and safe for all our residents and visitors.</p> <p>Parking is not allowed on footways or footpaths, pavements or grass verges – unless specifically exempted. Our parking enforcement officers can issue a Penalty Charge Notice (PCN) to vehicles parked in contravention or parked dangerously.</p> <p>You can report a problem vehicle on our website here. <a href="https://www.newham.gov.uk/parking-permits/parking-enforcement-fines">https://www.newham.gov.uk/parking-permits/parking-enforcement-fines</a></p> <p>We have provided the parking enforcement team with your comments</p>
Reg18-T-063	Student	Reg18-T-063/003	All about Newham							[Please provide any comments and feedback on *Section 1: All about Newham*.] and security for pedestrians	Comment noted. The Sustainable Transport Strategy sets out how reduction in car dependency and modal shift to walking/cycling/public transport can be achieved, and the Local Plan transport policies support the Council's effort to achieve this.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-095	Transport for London	Reg18-E-095/002	Transport							The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.	Comment noted.
Reg18-E-095	Transport for London	Reg18-E-095/003	Transport							We welcome the support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions.	Support noted.
Reg18-E-095	Transport for London	Reg18-E-095/004	Transport							We are pleased to note the commitment to 15-minute neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach.	Support noted.