

## Planning Committee Report

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### London Thames Gateway Development Corporation

### Emerging Planning Policy in the Lower Lea Valley: Newham Core Strategy – Choices for the Core Strategy Document

#### Report of the Director of Planning

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#### 1. Purpose of this report

- 1.1 This report sets out the proposed LTGDC response to the London Borough of Newham's Core Strategy ('Choices' document) which has been published for consultation. It is available to view on the Newham website:  
<http://www.newham.gov.uk/Planning/LocalDevelopmentFramework/CurrentLDFConsultations.htm>
- 1.2 As the LTGDC does not have policy or plan making powers, it is essential that the interests of the Corporation are reflected wherever possible in emerging planning policy of constituent boroughs to assist in the delivery of the Development Corporation's objectives.
- 1.3 The LTGDC Planning Committee has responsibility for considering policy documents and providing LTGDC's formal response.
- 1.4 A draft response to the consultation questions is attached at Appendix 1. A summary of the main points made is set out at section 6 of this report for member's information.

#### 2. Recommendation

- 2.1 That the Committee **Agree** that the Director of Planning respond to the consultation with comments as set out in Appendix 1 and any additional comments made by members at the meeting.

#### 3. Background

- 3.1 An 'Issues and Options' document was published for consultation in 2008. This consultation was very high level, and presented 3 options for consultation. The LTGDC responded to Newham at that stage, expressing support for Option 2, which was a mixed use option, focussing

development around existing centres, and having managed release of employment land. Although the responses from consultation have been taken into account in preparing the Choices for the Core Strategy document, it is considered that LTGDC should look at this document with fresh eyes and consider it on its merits, given that it is so different to the document that was previously consulted on.

- 3.2 Since the previous version of the core strategy, PPS12 has been amended, and strategic sites can now be allocated in the core strategy.
- 3.3 This report summarises the structure of the document for member's information, highlighting a number of issues of relevance for LTGDC. Newham would like to receive comments through an online questionnaire. The questions and proposed LTGDC response are therefore then set out in that format in appendix 1 to this report.

#### **4. The consultation arrangements**

- 4.1 The document is titled 'Newham 2027, Planning Newham – Choices for the Core Strategy'. Newham officers have explained that the document is not a Core Strategy document itself, but that it sets out 'Choices' for the Core Strategy.
- 4.2 There is a short 4 week consultation period. Following this, the responses will be analysed and the timescale is for a pre-submission consultation draft of the Core Strategy itself to be issued in early 2011. Officers understand the strategy will be considered by Newham's January Cabinet.

#### **5. How the 'Choices' document is structured**

- 5.1 **Key Diagram (page 13)** The diagram shows, indicatively, the proposed main spatial changes in Newham up to 2027. Further information on items identified on the map are found in the spatial designations table page 89 onwards.
- 5.2 **Arc of Opportunity (page 17)** The strategy identifies the vast majority of new development in Newham taking place within an 'Arc of Opportunity', running down the eastern side of the Lower Lea Valley and around the Royal Docks.

- 5.3 **The Five Themes (page 23).** Five themes have been derived from the Spatial Vision which will be used to structure the document and make it easy to understand. These themes are:
- 1 Creating successful places and communities
  - 2 Delivering high quality jobs
  - 3 Creating a high standard for homes
  - 4 Ensuring that new development is sustainable and responds to the challenge of climate change
  - 5 Providing the necessary infrastructure and services
- 5.4 **New Communities** are proposed in the document and are shown in a map on page 31. These are Olympic Legacy, Stratford Metropolitan, Stratford South, West Ham, Canning Town, Silvertown and Albert Basin.
- 5.5 **Policy Choices page (41-61)** choices for Jobs, Homes, Sustainability, Infrastructure, Social Infrastructure, Retail, Community Facilities, and Green Infrastructure are set out.
- 5.6 **Your Neighbourhood (page 62)** Newham have structured the Choices consultation document on the basis of the Council's nine Community Forum areas. Although sensible in some ways, this has meant a lack of focus on the 'Lower Lea Valley' as a place. LTGDC's areas form part of Stratford and West Ham (pages 63-67) (Lower Lea Valley); Canning Town and Custom House (page 78-82)(Lower Lea Valley); Royal Docks (page 85-86)(Lower Lea Valley; East Beckton (page 83-84)(London Riverside).
- 5.7 **Spatial Designations (page 87-111).** Spatial designations comprise three categories. Strategic Sites, Policy Areas and Major Infrastructure.
- 5.8 **Strategic Sites (map page 88)**
- 5.9 These provide the most opportunities for change during the plan period. There is no minimum size for a site to be included. The key aspect is their strategic importance in ensuring the aims of the plan are achieved.
- 5.10 **Policy Areas**
- 5.11 These are areas where specific policies will apply. The maps on page 87 shows proposed boundaries for Strategic Industrial Locations; the remainder of the designations are shown on the key diagram on page 13.
- 5.12 **Major infrastructure**
- 5.13 These comprise major programmed and proposed projects.
- 5.14 The policy areas and major infrastructure proposed include, and are listed in the spatial designations table:

- New and rejuvenated places
- Strategic Retail Growth
- Existing and enhanced centres
- New Local Centres
- Intensification around Crossrail Stations
- Employment hubs
- Strategic connections and new transport links
- Existing / Enhanced / New open spaces
- Utilities

5.15 Comments on these designations are provided as necessary in the proposed LTGDC response to the consultation questions as set out in appendix 1.

## **6. Summary of main points in LTGDC consultation response**

6.1 The Choices document is welcomed, as it is an important milestone in development of Newham's LDF, which will set a clear planning policy for the borough. The document sets out relatively clearly the issues that are affecting the area, and the policy choices available for the development of the borough to 2027. Officers consider that there are no policy areas, as set out in the document, which are controversial from LTGDC's point of view. Officers are supportive of the visions and themes and objectives set out in the 'Choices' document and above. Generally, officers are supportive of the Strategic Sites identified, most of the site allocations proposed, and the approach to retention of Strategic Industrial Land set out in the document. The main areas where officers consider the next version of the core strategy could provide more information or a clearer approach are set out below (and copied in appendix 1). Comments on specific site allocations are made in response to questions 73 to 102 in Appendix 1.

### **Key Diagram**

6.2 Officers consider that the mapping of these designations could be improved. The diagram is not easy to interpret, and the key interventions do not come across clearly. For example, the Lea River Park is identified as OS9, but it does not come through on the diagram that this open space runs the length of the Lea Valley. Bromley By Bow Gas Works have not been identified as a Strategic Site or as new open space on the key diagram. The Lea River Park framework suggest that this site could become a regional destination site (on a scale similar to the Eden project) for the Park. Officers understand that the gas works are likely to be

decommissioned within the life of the plan (i.e. before 2027) so therefore the Core Strategy should identify the gas holders as new open space and / or a strategic site, and options for their future use should be set out in the strategy. The way the borough is mapped, also means that the borough is shown as an 'island' and its position as part of East London does not come across. Officers consider indicative locations for new bridges across the Lea, for example from Sugar House Lane to Bromley by Bow, should be shown.

### **Infrastructure needs**

- 6.3 There is little in the document about how infrastructure will be delivered, or about what specific new social and community facilities will be needed alongside the anticipated housing growth. There are no sites that have been clearly allocated for specific community facilities, such as specific new schools in the core strategy. Officers understand that there are a number of schools that are already being provided, for example in Canning Town and as part of the Stratford City development. New schools are also proposed as part of the Minoco development. It would be useful if the Core Strategy could provide a comprehensive overview of such proposals, or at least signpost other education policy documents where this is set out. As set out above, new bridges across the Lea have not been shown. The infrastructure needs to be identified and brought forward in an organised way, to ensure that development is high quality and successful places are created, in accordance with Theme 1 of the strategy.

### **Delivery and Planning Obligations or Community Infrastructure Levy**

- 6.4 There is very little in the choices document about the approach the Borough will take to planning obligations or CIL, and how these mechanisms will be used to deliver infrastructure. A further version of the core strategy should be clear about the approach that will be taken to planning obligations, and the borough's timescales for implementing CIL. The LTGDC's Planning Obligations Community Benefit Strategy has been operating very successfully throughout the Lower Lea Valley over the past few years, and will continue to apply until March 2014 (or until Boroughs introduce CIL). Support for the LTGDC Strategy should be included in the next version of the Core Strategy.

### **Compulsory Purchase Powers**

- 6.5 Use of Compulsory Purchase Powers (by LTGDC or London Borough of Newham) is also not mentioned in the document. Compulsory Purchase Powers are an important tool available to authorities to implement their regeneration objectives, and help ensure development in accordance with their LDF comes forward. The next version of the core strategy should refer to Compulsory Purchase Powers and how they may be used.

## **Regeneration and the Arc of Opportunity**

- 6.6 Assessing the borough on the basis of the Community Forum Areas, whilst understandable in some respects, does mean a certain loss of focus for some of the main regeneration themes e.g. Lower Lea Valley. This is disappointing given the momentum which has built up around the regeneration of the area as a whole, not just the Newham area of the valley.
- 6.7 The next version of the core strategy could more clearly set out what has already been achieved in the 'Arc of Opportunity' and how regeneration of the area is ongoing. At present, the emphasis on neighbourhoods and the mapping of Newham does not set the strategy within its context very well. Also the Cody Road area being coloured as part of the Arc of Opportunity is not very helpful as it indicates that there will be change in the area, whereas LTGDC understands that this successful industrial area is to be retained as existing.
- 6.8 The next version of the Core Strategy should refer to the emerging proposals regarding the Mayoral Development Corporation. The current role of LTGDC and the LDA and future arrangements is also not referenced.

## **Priorities**

- 6.9 LTGDC consider there should be more about priorities set out in the next version of the core strategy, both in terms of themes and locations. Even in buoyant economic times development does not all happen at once. Given the strategy now runs to 2027 priorities should be proposed for different time frames.

## **Spatial Designations Schedule**

- 6.10 T4 – Should be called the 'Barking and Royal Docks Bus Corridor' and shown as a proposal on the key diagram.
- 6.11 T7 – As set out above there is no mention of Dagenham Dock extension to the DLR. The extension is referenced elsewhere in the text of the strategy so this may be an oversight. However, officers note that the extension is not included in either the key diagram or the Transport Connection diagram on page 10. The DLR route should be indicatively shown, as Crossrail is. LTGDC have refused planning permission for a development in Beckton (LTGDC -09-005-REM) on the basis that the development would occupy the DLR route, and this would prevent the Newham LDF being in line with the London Plan.

## **Terminology**

- 6.12 There is reference throughout the document to our residents and new residents. You could read "our residents" as being existing and the document in various places stresses the need to attract and retain new

residents. It should be clear that “our residents” includes existing and new residents.

**7. Next Steps**

- 7.1 The Committee is asked to agree that the Director of Planning respond to the consultation with comments as attached at appendix 1 and any additional comments made by members at the meeting.

**Date: 30 November 2010**

## ***Vision***

### **1. Do you support the vision on p. 12? y/n**

If no, please explain what you disagree with and suggest alternative wordings for all or part of the vision.

LTGDC support the vision, although consider that it could be expressed more concisely.

## ***Themes and Objectives***

### **2. Do you support the themes and objectives proposed to structure the Core Strategy on p. 23-26? y/n**

If no, please explain what you disagree with and suggest alternatives/additions

LTGDC Support the themes and objectives

## ***Successful Places***

**How can we promote better design quality, create safer places and enhance and reinforce character (pp. 28-29)?**

### **3. Do you agree that CABA's Building for Life criteria and the Borough's Character Study (see pp. 27-29) form a good basis for policies that seek better design, and liveable, sustainable, safe and healthy neighbourhoods?**

LTGDC Support the use of the building for life standard. However, it needs to be clear how building for life assessments will be carried out alongside the development management process and how it will be incorporated into the forthcoming Development Management policies DPD. The London Housing Design Guide should also be a relevant criteria to assess design and a tool to create successful neighbourhoods.

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

### **4. Do you agree that all housing schemes of 10 units or more should be required to attain a CABA Building for Life score of at least good (14-15.5)?**

Y/N If no, please explain your reasons and suggest alternatives where appropriate

Yes.

**5. Do you agree with classifying roads according to their function (as social streets , mixed priority streets , or travel streets ) to help support design policies, as described on p. 28-29?**

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

This classification of roads seems rather artificial and could be difficult to implement in practice. LTGDC consider it would be better to consider some vehicular road as “barriers to movement” and safeguard residential amenities in other ways e.g. definite traffic calming measures.

**6. Do you agree with the proposed character and context-based approach to tall buildings, which overall:**

- directs the borough s tallest buildings (20 storeys plus, but typically less ) to parts of Stratford, (mainly Stratford Central) reflecting the aspirations for it to become a Metropolitan Centre, with a smaller hub in Canning Town town centre;
- states that other accessible locations within the Arc of Opportunity will be regarded as suitable locations for buildings of up to 20 storeys, but typically 8-12 storeys, where they will contribute to legibility and place-making objectives;
- directs that elsewhere in the borough, new taller buildings should be less common and scaled and designed to relate to an already dense, and often heritage-rich context, as well as the SWOTS identified in the Character Study; and
- requires further 3D modelling to establish precise acceptable locations and formats within this framework, as well as to guide specific components of quality?

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC agree with the proposed approach to tall buildings

**How can we re-value our heritage and help it contribute to our regeneration agenda (p.29)?**

**7. As part of a strategy to re-value Newham s heritage and other assets, and given the various areas of search identified in the character study, should we aim to designate:**

- a) more conservation areas; or
- b) more areas of townscape value?

Please choose a or b and explain your preference, or suggest alternatives

LTGDC agree it is important to ensure that any conservation area designations are up to date, LTGDC do not consider that there are any conservation areas that it wishes to suggest for designation at present.

## How should we tackle barriers to connectivity (p. 29)?

### 8. Would specifying barriers that should be tackled as a priority help to ensure that these are addressed by new development?

Y/N If no, please explain your reasons and suggest alternatives where Appropriate

Yes barriers should be identified and proposals that have been proposed to help address these barriers should also be identified. E.g. new bridges across the River Lea to improve connections across the Lower Lea Valley and to link new and existing communities e.g. from Leamouth Peninsula to Canning Town and Sugar House Lane to Bromley by Bow.

## What can we do through planning to make Newham healthier (p.29)?

### 9. Should health impact assessments be required for all major schemes to ensure that health inequalities are addressed by development?

Y/N If no, please explain your reasons and suggest alternatives where Appropriate

Yes, as long the requirement for health impact assessments would definitely meant that new issues are raised and addressed through the development management process. As health issues would already be addressed through 'Integrated Impact Assessments' on policy documents, it is possible they may not be necessary through the planning application process.

### 10. Given concern about childhood obesity and the negative impacts of takeaways more generally, do you agree that we should restrict all new takeaway development within 800m of secondary schools?

Y/N If no, please explain your reasons and suggest alternatives where appropriate

No comment.

## How should we manage our town centres as unique but interdependent places (p. 30)?

### 11. Do you agree with the place-making strategy for the borough s town centres, recognising the need to manage them as an overall network as inter-related but unique places:

- that transformational change will occur at and around Stratford and Canning Town;
- Stratford will become a successful Metropolitan-scale centre, with new development at Stratford City and in the existing town centre complementing each other and creating a stronger destination, as being detailed through the Stratford Metropolitan Masterplan;
- Canning Town town centre will be expanded and re-oriented in its offer and spatial extent, creating a new focus to the area, as set out

**in the Canning Town and Custom House SPD;**

- Proactive change will be needed at East Ham to help it provide an equivalent quality of place to Stratford City, addressing weaknesses in the quality and mix of its offer, its public realm etc, whilst building on its accessibility by bus, foot and tube; popularity of independent shops and heritage, cultural and civic assets;
- In Forest Gate the key concern will be to make the best use of the area's heritage and independent offer, whilst enhancing the quality of its convenience, comparison and leisure offer in a compact, lifestyle-oriented centre;
- In Green Street, the quality of its offer and diversity of uses will be improved, within the context of its specialist ethnic identity and London-wide draw, which may require innovation in design and formats to maintain a focused centre;
- In East Beckton district centre, limited change will occur, though there is scope to renew the floorspace preferably together with measures to reduce its island format;
- That temporary meanwhile uses that enliven town centres in line with their visions will be encouraged; and
- That overall greater control of out of centre retail development is needed?

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

In general LTGDC support the proposals for management of town centres. At Canning Town, LTGDC support a reorientation of the town centre boundary as far as it is discussed in the text, but consider it is necessary to have a boundary shown on a map so that the implications can be fully considered.

**12. Given concern about the large numbers of takeaways in the borough, particularly in the town centres, should we either:**

- a) Take a uniformly restrictive approach to new takeaways in our town centres;
- b) Take a more fine-grained approach that defines areas of saturation within particular town centres; or
- c) Take an alternative approach (please specify) ?

a/b/c please explain your preferences

No comment.

**How should Gallions Reach Shopping Centre develop in the future (p. 30)?**

**13. Given that Gallions Reach shopping centre is an important destination but does not currently have the variety of uses and ease of pedestrian access from residential areas required for it to be designated as a formal town centre, should we:**

- i) Allow mixed use development in the area (perhaps including housing),

**allowing the centre to diversify to better integrate it into the urban fabric;**

**ii) Continue to prioritise employment uses in the area so that it is absorbed within the wider employment hub;**

**iii) Encourage the development of units selling bulky goods within it; or**

**iv) Take an alternative approach (please specify)?**

i/ii/iii/iv please explain your preferences

iv) The future of East Beckton and Gallion's Reach shopping centre should be set out more clearly in the core strategy. Measures to make them more accessible by public transport should also be set out in the core strategy. LTGDC note that the Beckton to Dagenham Dock DLR extension although discussed in the text of the choices document, is not identified on the key diagram or spatial designations. The Barking to Royal Docks Bus Corridor is also not identified. A clear approach to Gallion's shopping centre, and the circumstances under which change would be acceptable, needs to be set out.

Gallions shopping centre is always considered in isolation. Beckton Triangle is not far away and there is a significant Sainsburys there plus the comparison stores etc. Should the future of both areas not be considered together? The status of the Triangle in the future should also be confirmed.

### **What kind of new communities and places should we be creating in our major development areas (pp.31-32)?**

**14. Do you support the designation of and broad vision for the new communities and places described on pp. 31-32?**

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC support the broad location of the new communities and places, and has the following specific comments.

Page 32, Summary of Successful Places. Under "West Ham" there is no reference to community uses and the same is true for detailed text later at N4, S10 on page 95. This seems to ignore the current use of a large site as a mosque. A proper mixed use development on the site, including community uses should be sought on this site. Under "Silvertown" reference should be made to the permitted scheme for Minoco Wharf (which will not be implemented). Proposals are now coming forward for a larger site and this text should reflect that, both in terms of quantum and name. "Wharf" has been dropped from the title given site is much larger than the previous wharf. This comment also applies to Page 39 in the section on Thameside West.

Page 31, section on Stratford Metropolitan. Refers "to promote new education....uses". Should be more positive and refer to permission for Birkbeck/UEL building. This also applies to Page 36 in fifth bullet of first set of bullets on further and higher education and Page 56 in fourth bullet.

### **What should our approaches to other place-making issues be (pp.**

28-32)?

15. Other policy direction proposed in this Chapter concern:

- Mixed use communities - seeking to direct development to avoid environmental and community safety problems related to bad neighbour uses (including some industries and takeaways) and empty ground floor commercial units.
- Heritage assets, and others that positively contribute to local character encourage the re-use of, and innovation to realise their potential.
- Town and local centres an overall policy presumption to maintain, manage and enhance their qualities as places.

**Do you agree with these policy directions?**

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC generally support the approach proposed.

**16. Are there any other matters relating to successful places that we need to address in the Core Strategy?**

*Note: The Core Strategy should contain only strategic policies as opposed to a more detailed policy that would be in the Development Control Policy Manual, or other guidance*

y/N

If yes, please explain what other matters relating to successful places should be covered in the Core Strategy and why.

There is little in the document about how infrastructure will be delivered, or about what specific new social and community facilities will be needed alongside the anticipated housing growth. There are no sites that have been clearly allocated for specific community facilities, such as specific new schools in the core strategy. Officers understand that there are a number of schools that are already being provided, for example in Canning Town and as part of the Stratford City development. New schools are also proposed as part of the Minoco development. It would be useful if the Core Strategy could provide a comprehensive overview of such proposals, or at least signpost other education policy documents where this is set out. As set out above, new bridges across the Lea have not been shown. The infrastructure needs to be identified and brought forward in an organised way, to ensure that development is high quality and successful places are created, in accordance with Theme 1 of the strategy.

## **Jobs**

**How should we help support investment in the New Economy? (p. 36)**

17. Policy directions are scoped in relation to:

- Surplus traditional employment land supporting the development of some in new ways
- Stratford and Canning Town transforming them as key engines for growth in the retail, leisure and office sectors
- Other major new employment investment, notably in green industry to be focused on sites at the eastern edge of Beckton and the Royal Docks
- Visitor attractions, leisure and hospitality continuing to promote their development in the Royal Docks, with links to growing offers in Stratford,

### *Green St and Three Mills*

- *Further and higher educations supporting growth and development of, and spin-off R&D at the Royals and Stratford*
- *Temporary uses - supporting, where these will help deliver permanent uses.*

### **Do you agree with these policy directions?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC generally support these policy directions however the text should emphasise the role of education and cross refer to the underlying theme of Convergence.

The text should include support for the green enterprise district, and the jobs that will result from the development of the district.

### **What should the Council s approach to employment land be (p. 36)?**

*18. The proposed approach to employment land follows national policy in affording protection to employment land, recognising the need to consider changes of use between employment use classes on such land on their merits and recognising the value of other employment sources on land not designated as employment (e.g. retail and leisure).*

*It also recognises that there is scope for release of some surplus employment land, (perhaps up to 70 hectares, less than 20% of employment land stocks) continuing present trends that prioritise release in Stratford and the Lower Lea Valley with a corresponding increase in protection of employment areas in Beckton.*

*The following criteria are proposed to assess a site s suitability for release:*

- i) The site is proposed for release in the LDF in order to meet wider regeneration objectives;*
- ii) The site is vacant for a minimum period or supports a minimal number of jobs, and there is no prospect of the site being reused without a formal change of use;*
- iii) The replacement scheme will support a similar or greater number of jobs than exists at present*
- iv) The existing use has serious environmental impacts and its relocation elsewhere is the most practical solution;*
- v) The proposed use is suitable for the site and adequate infrastructure is in place to support the new use;*
- vi) Introducing non-employment uses will not prejudice the retention of employment*

### **Do you agree with this approach to employment land and the suggested release criteria?**

Y/N

If no, please explain what you disagree with and suggest alternatives where Appropriate

LTGDC generally support the release criteria. However, the strategy needs to be clear on which areas are designated for retention, and where there are opportunities for mixed use.

### **How should we support existing businesses to grow and develop (p. 37)?**

*19. Policy directions are scoped in relation to:*

- *Business space ensuring units of a range of sizes continue to be available*
- *Existing employment space protecting it where viable, whilst supporting growth in particular hubs (see below)*
- *Planning applications where a significant growth of local jobs is proposed taking a flexible approach*
- *Town centres and other distinctive places re-instating or enhancing distinctive offers*

#### **Do you agree with these policy directions?**

Y/N

If no, please explain what you disagree with and suggest alternatives where Appropriate

LTGDC generally agree with the policy directions.

### **How can we attract more jobs for local residents and help more people into work (p.37)?**

*20. Policy directions are scoped in relation to:*

- *Workplace continuing to ensure that development contributes to this successful Council initiative, and increase access by working to promote co-location of outlets with other community services.*
- *Education and training making sure we have modern, fit for purpose facilities*
- *Easier and cheaper transport to work improving transport links, especially walking and cycling, and bringing places of work back into communities by promoting mixed use areas.*

#### **Do you agree with these policy directions?**

Y/N

If no, please explain what you disagree with and suggest alternatives where Appropriate

LTGDC generally agree with the policy directions.

### **Where should we protect and promote as key employment locations (pp.38-39)?**

*21. The following are proposed as employment hubs, recognising their continued importance in providing employment, with scope for further growth:*

- *Stratford*
- *Canning Town*

- ExCel and Royal Victoria
- London City Airport
- Royal Albert North
- Newham University Hospital
- Green Street/East Ham
- Thameside East (Strategic Industrial Location)
- East Beckton (Strategic Industrial Location boundary to include London Industrial Park, Beckton Riverside and adjacent transport and utilities land)
- Cody Road (Strategic Industrial Location boundary to incorporate Prologis Industrial Park)
- Thameside West (Strategic Industrial Location boundary subject to strategic site S31 options - should the first choice be pursued, the boundary will include the current PEA boundary plus Thames Wharf; should the second be pursued, the site will comprise part employment hub with possible SIL designation, and part new neighbourhood)

**Do you agree with these proposed employment hubs and associated proposed Strategic Industrial Location extents (see also map on p. 88, and spatial designations E1-12) ?**

Y/N

If no, please explain what you disagree with and suggest alternatives where Appropriate

LTGDC generally agree with the proposed designations.

The Core Strategy should set out clearly the Council's approach to the future of Beckton Riverside, as planning policy in this area has been unclear. LTGDC recognise the challenges of creating successful residential communities in this area, given the impact of Thames Gateway Bridge safeguarding, potential DLR safeguarding and existing infrastructure such as the sewage works and DLR depot, and do not object to the proposed designation as SIL. The reasons why the Council think that SIL is the most appropriate use of the land should be set out .

LTGDC consider the section on ExCel and Royal Victoria could better reference the planned Cross Rail station and the potential to create additional employment on the back of Cross Rail and ExCel's role as an international convention centre. The opportunities being brought to Newham by the arrival of such an important transport link do not seem to have been exploited enough by the core strategy.

LTGDC support the approach to Thameside West that is set out in the Lower Lea Valley OAPF prepared by the GLA, and consider Newham should follow this approach.

### **22. Are there any other employment matters that we need to address in the Core Strategy?**

*Note: The Core Strategy should contain only strategic policies as opposed to a more detailed policy that would be in the Development Control Policy Manual, or other area-based development plan documents, and other guidance*

y/N

If yes, please explain what other employment matters need to be addressed

in the Core Strategy and why?

No

## **Homes creating mixed and balanced communities**

### **Where, when and how much new housing should be built (pp. 42)?**

**23.** *The table on p. 42 indicates broadly where, when and how much housing could be delivered over the next 15 years in line with the London Plan. This is based on our most up to date knowledge of the housing potential on available sites. This takes account of the objective to create mixed and balanced communities, including new employment opportunities, whilst making best use of land and public transport accessibility and providing adequate supporting infrastructure.*

**Do you think our estimates by area and phase are right? Y/N (NB: Comments on individual site can be made in the strategic sites section)**  
If no, please explain what you disagree with and why.

LTGDC do not wish to comment in detail on these estimates.

### **What type of housing is needed (pp. 43-45)?**

**24. Do you agree that 39% of all new housing should be for families, and that this should typically be of 3 bedrooms? y/n**

If no, please explain your reasons and suggest an alternative

Although LTGDC do not dispute the need for 39% family housing, it considers that this will be difficult to achieve on all sites. The Core Strategy should also consider what changes could be encouraged in the existing housing stock in order to provide for more family housing from the existing stock rather than only relying on new stock.

**25. Do you agree with a proposed negotiation target, based on viability evidence, of 35-50% of housing to be affordable (with a preferred tenure split of 60% social rent, and 40% intermediate housing), taking into account the following criteria:**

- The need to secure mixed and balanced communities and to meet the Core Strategy (London Plan) housing target
- Scheme viability
- The availability of subsidy
- The existing mix of housing in the area
- The individual circumstances of the site in terms of site conditions, local context and site features
- The availability of required infrastructure and community facilities for residents.

y/n

If no, please explain what you disagree with and suggest alternatives

LTGDC support the proposed policy.

### **What restrictions should be in place on dwelling conversions to flats and homes in multiple occupation (p. 46)?**

26. *Bearing in mind the changes in the mix of tenure and housing stock in Newham, (particularly the rise of private renting and loss of family-sized units) and the needs of both families and young, more mobile people,*

**Should we:**

- i) Take a more restrictive line to protect the borough s now limited supply of family-sized homes by restricting any further flat conversions and homes in multiple occupation in wards or Community Forum Areas with high rates of conversion and b) limiting the number of conversions to flats and homes in multiple occupation in a street to a maximum of 15% Y/N**
- ii) Set criteria for minimum floorspace and number of units formed from the original dwelling, in line with the London Plan/London Housing Design Guide (interim version) y/N**
- iii) Judge dwelling conversions to flats and homes in multiple occupation on their highway, environmental and amenity impacts? Y/N**
- iv) Take another approach? Please specify what. Y/N**

LTGDC do not wish to comment in detail on this policy, although LTGDC support the retention of family housing.

### **What should our approaches to other housing issues be (pp. 44-45)?**

27. *The chapter also proposes policy directions relating to other housing issues:*

*Do you agree with the following:*

*a) Providing for specialist housing needs this would entail carrying forward London Plan policies on Lifetime Homes and Wheelchair housing and where need is identified to provide suitable accommodation e.g. for older people needing care or student flats.*

*b) Housing Quality and residential amenity will be improved through use of internal space, design and sustainability standards as well as careful management of infill development.*

**Do you agree with these policy directions?**

y/n

If no, please explain what you disagree with and suggest alternatives

LTGDC support the general policy directions.

### **28. Are there any other housing matters that we need to address in the Core Strategy?**

*Note: The Core Strategy should contain only strategic policies as opposed to a more detailed policy that would be in the Development Control Policy Manual, or other guidance*

y/N

If yes, please explain what other housing matters need to be addressed in the core strategy and why?

Page 41, Key findings from housing evidence base. Should there not be a reference to poor condition of many of the private houses and action that Newham has started to take. There is not much in this document about existing housing stock – whilst the provision of new accommodation is obviously very important, given the large number of existing older houses in the borough and the challenges they provide( not just condition but also sub division) this should be recognised.

As set out earlier in response to question 16, there is little in the document about how infrastructure will be delivered, or about what new social and community facilities will be needed alongside the anticipated housing growth. Key to meeting the objective of creating successful places and communities will be ensuring social infrastructure is available alongside new housing.

### ***Sustainability and Climate Change***

**What should our approaches to sustainability and climate change be (pp.48-52)?**

**29. In order to maximise the sustainability of new development, do you agree that all major development proposals should be assessed against the Code for Sustainable Homes or BREEAM (for non residential) and if so, should we set minimum requirements (e.g. Code Level 4/BREEAM Excellent) ?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

Agree that major development should be assessed against the Code for Sustainable Homes or BREEAM. Agree that the minimum requirement should be Code level 4 or Breeam Excellent. Detailed policy should be set out in further DPDs that are prepared. It is noted that there are a number of standards that development will need to meet i.e. Building for Life, Code for Sustainable Homes, London Housing Design Guide.

**30. Other policy directions scoped in this chapter, linking to national and London-wide policy are:**

- *Minimising waste and increasing reuse and recycling ensuring that waste and recycling management are easy and convenient for consumers, and that re-use and recycling of building materials and buildings is encouraged.*
- *Minimising flood risk ensuring that the requirements of national policy (PPS25) are implemented, using the borough s Strategic Flood Risk Assessment, and requiring all major developments to incorporate sustainable urban drainage.*
- *Making better use of water requiring all developments to incorporate water saving measures, and to explore the potential of water neutrality*

*not taking more water than existing site conditions allow.*

*- Minimising car use by ensuring alternatives are attractive and convenient, maximising the potential of Crossrail measures as specified on p. 47 including sustainable travel plans for new developments, improvements to street design, and restrictions on car parking.*

*- Reducing road based freight - by promoting rail and water freight, safeguarding wharves and rail sidings, and locating and planning developments requiring significant freight movements to minimise HGV distances to the principal road networks.*

*- Protecting and enhancing biodiversity measures as specified on p. 49 concerned with preventing harm to wildlife and habitats and maximising opportunities to create new habitats and growing space and to enhance access to nature, including requiring major developments to incorporate living walls and roofs.*

**Do you agree with these policy directions?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC agree with the proposed policy directions.

**31. Are there any other matters relating to sustainability and climate change that we need to address in the Core Strategy?**

*Note: The Core Strategy should contain only strategic policies as opposed to a more detailed policy that would be in the Development Control Policy Manual, or other guidance*

y/N

If yes, please explain what other matters relating to sustainability and climate change should be included in the strategy and why.

No

### **Infrastructure**

**How can demands for better international and London-wide transport connections be met in Newham (p. 53-55)?**

**32. Do you agree with the proposed support of strategic transport schemes outlined on p. 53-4 and the associated spatial designations T1-T7 ?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC agree Newham should support the proposed strategic transport schemes listed, T1 to T7. However, it is considered that Newham could prioritise some of these improvements. For example, there are two road bridges proposed, although LTGDC understand it is likely that the Silvertown tunnel will now be delivered first. Is there a priority that Newham would want to assign to these

transport improvements for spatial development reasons? The text on page 54 and on page 85 mentions the Dagenham Dock DLR extension, but this is not listed in the proposed strategic transport schemes T1-T7 or on the key diagram. Is this a deliberate omission or an oversight? LTGDC consider the Dagenham Dock DLR scheme should be included on the key diagram and table of schemes. T4 should also be called the 'Barking and Royal Docks Bus Corridor' and shown as a proposal on the key diagram and transport connections diagram.

### **33. What is your view on possible further expansion of London City Airport and possible alternatives?**

LTGDC does not wish to comment on the future of London City Airport as part of this consultation exercise. LTGDC does not have access to all of the information through this consultation, to make a judgement. There needs to be a balance between impact on surrounding area in terms of noise and pollution, environmental impacts, and the economic benefits for Newham and London as a whole in considering the future of the airport. LTGDC does consider that the airport brings economic benefits to the area.

### **How can we make best use of existing community infrastructure, including community buildings and physical infrastructure such as wharves (pp. 54-57)?**

#### **34. Do you support a review of wharf demand in Thameside West potentially resulting in a reduction of river frontage taken up by wharfs?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC support a review. Should build on the completed Thameside West study of which the borough was a participant. LTGDC support the consolidation of wharves to the west enabling land to be released in the east in line with the Lower Lea Valley OAPF.

#### **35. Do you support the protection of public houses as facilities of importance to the community ( community uses )?**

Y/N

If no, please explain your reasons and suggest alternatives where appropriate

LTGDC does not wish to comment on this issue.

### **Where should new community infrastructure be located, and how should it be planned? (pp. 57-58)**

#### **36. Should town centres, and where appropriate local centres, be**

### **promoted as key locations for new community facilities to promote accessibility and complement town centre roles and functions?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

Yes, but as set out in our response to questions 16 and 28, the Core Strategy should say much more about infrastructure delivery, infrastructure need and where new infrastructure such as schools should be located.

### **37. Is a 5-10 minute walk (400-800m) an appropriate basis for planning local centres within major new areas of development?**

Y/N

If no, please explain your reasons and suggest alternatives where appropriate

Yes. Local centres should be appropriate in size, scale and facilities to the new area of development. It should also be borne in mind that there may be centres outside of the Newham boundary which will also serve development in Newham. For example, the new district centre in Bromley by Bow would serve new residents in Sugar House Lane provided the proposed bridge across the Lea between the two areas is provided. As set out elsewhere in this response, the future role of the retail park at East Beckton should also be confirmed.

### **How should the town centre and local centre network and hierarchy evolve? (p.58)**

#### **38. Do you agree with town centre hierarchy and network development strategy that proposes:**

- **Canning Town and Stratford will be the priority areas for major town centre development improving their statuses within the hierarchy and network;**
- **Other centres will maintain their existing role and function paying particular regard to the local markets they serve, and the need to evolve to withstand competition;**
- **Further out of centre retail park development will be resisted;**
- **Overall attempting to re-balance the network and re-direct people s spend that currently goes elsewhere**
- **Associated spatial extents as specified where relevant in the spatial designation section EC1-6; LC1-4; IC1-3)?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC generally support the policy directions. As stated above, a map of the new town centre boundaries especially in Canning Town should be provided for public consultation. On Page 56, under Town Centres and Stratford as Figure of 2,500 sq metres for net new convenience shopping is mentioned. Should this be 25,000?

**39. Do you support the designation of a new local centre at Maryland reflecting its significance as a local shopping destination, and the pursuit of new local centre provision at West Ham, Silvertown, Plaistow and on the Olympic site reflecting gaps in provision and opportunity sites?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

Yes, as set out in our response to question 37, the role of centres close to the Newham boundary such as Bromley By Bow should also be considered when planning centres.

**40. Do you support the promotion of local centre improvements at Freemasons Road/Custom House, Manor Park and North Woolwich?**

Y/N

If no, please explain what you disagree with and suggest alternatives where appropriate

Yes, although as noted above in relation to Custom House, it does not seem as though the opportunities arising from the new Crossrail station at Custom House have been fully reflected in this choices document.

**41. National policy allows us to specify a local threshold for retail impact assessment. Given that the town centre network has been harmed by out of centre spending, should we:**

**i) Set a threshold of 300 sq m of new retail floorspace above which retail impact assessment will be required?**

**ii) Set a higher threshold between 300 sq m and the national default threshold of 2500 sq m; or**

**iii) Not have a local threshold?**

i/ii/iii please explain what you disagree with and suggest alternatives where appropriate.

LTGDC consider that this is an issue for Newham to determine, but would not be averse to a 300m limit as suggested.

**42. Do you agree that to ensure easy access to basic food requirements, whilst recognising their unsuitability as locations for wider community functions, some smaller groups of shops and individual shops should be designated as Local Shopping Parades or given individual protection?**

Y/N

If no, please explain what you disagree with and suggest alternatives where

appropriate

LTGDC Support local shopping parades being identified for protection.

## **How should we tackle other community infrastructure issues (pp. 55-61)?**

**43.** *The chapter also scopes policy directions relating to:*

- *Walking and cycling infrastructure ongoing improvements to the public realm, and emphasis on good pedestrian and cycle access within and in/out of new areas of development*
  - *Energy networks identifying and safeguarding existing and possible future networks; requiring energy masterplans to be prepared for major development opportunities, and requiring connection to existing or planned networks where feasible (see also Spatial Designations Schedule U3).*
  - *Waste management - encouragement of movement up the waste hierarchy; protect existing waste infrastructure and provide for new needs, as proposed in the Joint Waste Plan and in recent planning permissions for sewage tunnels and treatment works capacity (see Spatial Designations Schedule U1, U2).*
  - *Social Infrastructure continued protection of existing community uses, whilst promoting co-location and multi-use of facilities in accessible locations.*
- Sports and recreation general approach will be to support proposals as opportunities arise.*
- *Public parks, play space, allotments, natural and semi-natural green space protection, new provision and enhancement, (see Spatial Designations Schedule OS1-10) with new local standards to be proposed on the basis of an audit of existing provision, recognising the multiple benefits of green space.*
  - *Metropolitan Open Land some review may be needed in the lower Roding Valley (see Spatial Designations Schedule OS7, OS10).*
  - *Blue Ribbon Network (river and waterways) - identification of the Thames Policy Area, and protection and enhancement of the network, protecting, identifying and supporting opportunities (e.g. freight wharves, and tourist, passenger or cruise liner facilities) to increase the use and benefit of it subject to other planning and regeneration objectives (See Spatial Designations Schedule OS6);*

### **Do you agree with these policy directions and associated proposed spatial designations?**

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC generally support these policy directions and associated proposed designations. However, there is no mention of the 'Lea River Park' or Fatwalk proposals, which are being promoted and implemented by LTGDC. This section could usefully set out that the Fatwalk and Lea River Park proposals will address the requirements for enhancements of waterway facilities and new walking and cycling networks. (page 61). Sites for specific social infrastructure such as schools do not

appear to have been designated. It is important that such uses are brought forward alongside new housing.

#### **44. Are there any other infrastructure matters that we need to address in the Core Strategy?**

*Note: The Core Strategy should contain only strategic policies as opposed to a more detailed policy that would be in the Development Control Policy Manual, or other guidance*

y/N

If yes, please explain what other infrastructure matters you think should be included in the Core Strategy and why.

The future of the gas works at Bromley by Bow Twelve trees Crescent should be considered, given that they gasholders are likely to be decommissioned by 2027.

Sites for specific social infrastructure such as schools do not appear to have been designated. It is important that such uses are brought forward alongside new housing.

The boroughs approach to infrastructure delivery should also be set out. There is very little in the choices document about the approach the Borough will take to planning obligations or CIL, and how these mechanisms will be used to deliver infrastructure. A further version of the core strategy should be clear about the approach that will be taken to planning obligations, and the borough's timescales for implementing CIL. The LTGDC's Planning Obligations Community Benefit Strategy has been operating very successfully throughout the Lower Lea Valley over the past few years, and will continue to apply until March 2014 (or until Boroughs introduce CIL). Support for the LTGDC Strategy should be included in the next version of the Core Strategy.

### **Neighbourhoods**

#### **Stratford and West Ham**

#### **45. Do you agree that the planning issues on p. 63 are the most significant locally, as summarised here:**

- managing the Olympic Legacy for local benefit;
- managing development pressures and delivering planned growth for long lasting benefit, creating a coherent Metropolitan centre at Stratford, combining old and new;
- capitalising on the growth planned for the area by making links between housing, education and skills, health, enterprise and social infrastructure;
- spreading the benefits of development;
- promoting the re-development of under-used industrial land to mixed uses, building on locational opportunities;
- needing to protect and enhance significant heritage assets?

y/N If no, please explain what you disagree with and suggest alternatives

Although LTGDC can understand the decision to emphasise the Community Forum areas, it is not necessarily appropriate to consider Stratford and West Ham as one area. e.g. on Pages 63 – 67 on Stratford and West Ham. West Ham hardly features in this section and whilst there is a lot more happening at Stratford there should be more acknowledgement of issues and opportunities around West Ham.

Given that this area and the Canning Town area are likely to see significant change, should this not be reflected in the text more explicitly?

LTGDC understand that the local population should benefit from the Olympic legacy, but the Core Strategy could also emphasise harnessing the benefits of Olympic Legacy to make Stratford and the Lower Lea Valley a more important place in London.

**46. A vision for Stratford and West Ham as a whole is set out on p. 67. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

This section does not say much about the opportunities at Sugar House Lane.

**47. The aims and ideas for the part of the area known as Metropolitan Stratford are set out on pp. 64-6. What do you think of them?**

Support/don't support If don't support, please explain what parts of the aims and ideas for Metropolitan Stratford you specifically don't support and why and suggest alternatives if appropriate.

LTGDC have already given informal officer level comments on the Stratford masterplan. Generally these comments were supportive of the seven ideas in the masterplan. However, in relation to the 'Sugar Pudding' quarter, LTGDC are unconvinced that these two neighbourhoods can be successfully combined into one given the dominance of the bisecting Stratford High Street and the increased profile of Bromley by Bow.

**48. Spatial proposals and policy directions for Stratford and West Ham to help address the issues and deliver the vision are set out on p. 67. Do you agree with them, as summarised here: -**

- Designation of Stratford as an employment hub and centre for strategic retail growth, focusing office and the borough's tallest building development in the area;
- Measures to integrate Stratford City with the existing town centre, together with investment in its regeneration to create a vibrant Metropolitan Centre;
- Creation of a new local centre at West Ham near the station;
- Designation of several new neighbourhoods within the area, addressing connectivity to the west across major barriers;
- Intensified development and designation of a new local centre around Maryland Cross Rail station; and
- Re-valuation of local heritage through potential additions to the range of

local conservation areas, and attention to integration of heritage assets within new areas of development?

Y/N If no, please explain what you disagree with and suggest alternatives where appropriate

LTGDC generally agree with the proposals and policy directions proposed in the questions.

### Forest Gate

**49. Do you agree that the planning issues on p. 68 are the most significant locally, as summarised here:**

- The town centre has attractive features, but is suffering from a high number of takeaways and betting shops, and lack of variety in its retail and leisure/evening offer;
- Much of the area comprises fine Victorian heritage protected by conservation area status. However, other parts of the area are exhibiting symptoms of decline. There is active developer interest in town centre sites which needs to be managed in order to integrate new with old;
- Whilst the area is relatively well served with infrastructure, there is some concern that community infrastructure may not be able to cope with demand created by new development; infrastructure needs include a facility for the local artistic community?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**50. A vision for Forest Gate is set out on p. 69. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**51. Spatial proposals and policy directions to help address the issues and deliver the vision for Forest Gate are set out on p. 69.**

**Do you agree with them, as summarised here: -**

- Create a vibrant mixed use town centre for local people, partly through new development near the station to help diversify the town centre uses, and the promotion of a new safer evening economy;
- A character-based approach to urban design that prioritises managing an increase in development density within the historic environment; retaining and enhancing the best of the Victorian heritage; examining the potential for further conservation areas; and identifies the capacity for change and innovation in this context on sites near the station, tired post-war estates and parts of major routes;
- Upgrade the public realm, provide new public open space and tackle

traffic congestion?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

## Manor Park

**52. Do you agree that the planning issues on p. 70 are the most significant locally, as summarised here:**

- An increasing number of children living locally, requiring new primary schools, play facilities, childcare facilities etc;
- Poor quality public realm, parking and congestion issues, especially along Romford Road and High Street North;
- Lack of a local centre with a range of shops, services and community facilities providing a clear focus to the area; and
- Lack of open space in the centre of the area, and existing parks needing improvements ?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**53. A vision for Manor Park is set out on p. 71. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**54. Spatial proposals and policy directions to help address the issues and deliver the vision for Manor Park are set out on p. 71. Do you agree with them, as summarised here: -**

- Intensification of development near to the new Crossrail station, enhancing and expanding the Manor Park local centre;
- Improvements to the public realm, to reduce crime and anti-social behaviour, and enhance access to green space;
- Measures to increase capacity of primary schools;
- Provision of better quality housing through small scale redevelopments; and
- A character-based approach to urban design that explores the potential for new conservation areas, and identifies most capacity for change and innovation along major routes as part of a strategy to improve legibility, increase the sense of place and enhance heritage assets?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

## East Ham

**55. Do you agree that the planning issues on p. 72 are the most significant locally, as summarised here:**

- The need for the town centre to be strengthened in light of competition from the soon to be opened Stratford City;
- There are significant civic heritage assets in the area which contribute to its character, but which could be enhanced through careful refurbishment and re-use for other uses;
- The need for new community facilities to keep pace with a growing population a new primary school and polyclinic - but a lack of suitable sites on which to develop them; and
- There is a lack of open space in the centre of the area?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**56. A vision for East Ham is set out on p.73 . Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**57. Spatial proposals and policy directions to help address the issues and deliver the vision for East Ham are set out on p. 73. Do you agree with them, as summarised here: -**

- Designation of East Ham as an enhanced centre and employment hub, with the potential for new development and intensification on sites within the town centre boundary;
- Re-use of the town hall site for mixed use development incorporating civic and other community uses, and retaining the historic buildings;
- Investment in Langdon School, with the opportunity for enhanced community use; and
- A character-based approach to urban design which explores the potential for new conservation areas, and identifies most capacity for change and innovation within the town centre and on Barking Road close to the town centre as part of a strategy to enhance the town centre's environment and distinctiveness ?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

### **Green Street**

**58. Do you agree that the planning issues on p. 74 are the most significant locally, as summarised here:**

- The need to improve the physical appearance of parts of the area;
- The strengths of the town centre's Asian identity and London-wide draw being negatively affected by the concentration of takeaways and loss of town centre focus by development beyond its boundaries;
- The need to renew the market whilst ensuring it continues to meet local

needs;

- The possibility that West Ham United may re-locate, leaving a significant development site in the area; and

- A lack of health and recreational facilities including open space?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**59. A vision for Green Street is set out on p. 75. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**60. Spatial proposals and policy directions to help address the issues and deliver the vision for Green Street are set out on p. 75. Do you agree with them, as summarised here: -**

- Designation of Green Street as an Enhanced Centre and Employment Hub, with the potential for new development including the renewal of Queens Market with the opportunity to incorporate community uses;
- A flexible approach to changes of use within the town centre that reinforce its attractiveness, realising the potential of smaller sites for mixed use;
- A commitment to prepare a masterplan for West Ham's existing ground if relocation is confirmed - probably to include high quality housing, community uses and a community green space linked to Priory Park; and
- A character-based approach to urban design which prioritises improving the focus to the town centre, enhancing open space provision and housing quality, and identifies the most capacity for change and innovation along key routes, particularly near the station, and in post-war estates to help achieve these aims?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

### **Plaistow**

**61. Do you agree that the planning issues on p. 76 are the most significant locally, as summarised here:**

- Unsatisfactory local shopping and services and a lack of clearly identified local centre;
- Need for an expanded primary health care building;
- Poor pedestrian and cycle connections, and domination of roadspace/ car-space in post-war development
- Lack of green space in the centre of the area, but potential to improve links to parks just outside the area

- Significant small scale heritage assets across the area, including historic coaching inns and Plaistow Hospital, which could all benefit from enhancement?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**62. A vision for Plaistow is set out on p. 74. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

**63. Spatial proposals and policy directions to help address the issues and deliver the vision for Plaistow are set out on p. 77. Do you agree with them, as summarised here: -**

- Allocate a site for a new Plaistow local centre, in the vicinity of the station;
- Support for expansion of health, community and/or education facilities in the vicinity of Newham University Hospital, which will be a designated employment hub;
- Support for expansion of NewViC if required, or to find alternative uses for the site if they decide to re-locate; and
- A character-based approach to urban design that prioritises improvements to connectivity and the quality of housing in the area, making appropriate re-use of buildings where necessary and identifies the greatest capacity for change and innovation along main routes, particularly in the station vicinity, and more generally within post-war estates?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC does not wish to comment on this matter.

### **Canning Town and Custom House**

**64. Do you agree that the planning issues on p. 78 are the most significant locally, as summarised here:**

- Good public transport connections, but barrier effects created by major infrastructure such as the A13 and the DLR;
- Lack of tenure mix, and a mixed quality of local housing, some of which is being demolished and re-built.
- Limited retail and commercial leisure facilities,
- Poor connections to the town centre and through the area; and
- The need to promote the re-development of under-used industrial land to mixed uses, building on locational opportunities ?

y/N If no, please explain what you disagree with and suggest alternatives

The planning issues listed are the most significant for the Canning Town and Custom House area. However, in relation to redevelopment of underused industrial land, LTGDC assume that the text is referring to sites 10a and 10b on page 80, in which case LTGDC are supportive of the proposal

(subject to further comments on S12 below – LTGDC does not consider that all of S12 should be released from SIL).

**65. A vision for Canning Town and Custom House is set out on p. 81. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC generally support the vision. The 'Canning Town and Custom House' masterplan should be reflected in policies that are developed to implement the vision. Although the adopted SPD was prepared following completion of the masterplan, there may be issues that were set out in the masterplan that could not be addressed through the SPD but could be addressed through new policies in the LDF.

**66. Spatial proposals and policy directions to help address the issues and deliver the vision for Canning Town and Custom House are set out on p. 82.**

**Do you agree with them, as summarised here: -**

- The designation of Canning Town as a new neighbourhood, employment hub and centre for strategic retail growth, with an expanded town centre to include a new foodstore, and carefully-placed taller buildings at its heart;
- Intensification of uses around Custom House station, some taller buildings, an enhanced local centre, public space, residential and community uses;
- An employment hub at Cody Road;
- Making new connections including 2 new through streets;
- Consider scope for mixed use in other parts of the area; and
- As a long term aspiration seeking the removal of overhead power lines throughout the area?

y/N If no, please explain what you disagree with and suggest alternatives

Yes. However it is considered that the removal of the overhead powerlines would be very difficult and expensive, and although a worthy aspiration will not be practical.

### **Beckton**

**67. Do you agree that the planning issues on p. 83 are the most significant locally, as summarised here:**

- The area comprises widely differing land uses (residential, retail parks, utilities and infrastructure, industrial/warehousing) bringing about problems of integration and connectivity within and beyond the area;
- Residential development is spread out reducing the catchment area and therefore the viability of community facilities;
- Lack of public access to riverside environments; and
- The East Beckton district centre is inward-looking (being an indoor shopping centre) lacks a variety of offer, and is isolated amidst a large area of car-parking?

y/N If no, please explain what you disagree with and suggest alternatives

See response to question 69.

**68. A vision for Beckton is set out on p. 84. Have we got the vision right?**  
y/N If no, please explain what you disagree with and suggest alternatives

See response to question 69.

**69. Spatial proposals and policy directions to help address the issues and deliver the vision for Beckton are set out on p. 84. Do you agree with them, as summarised here: -**

- Designating Beckton business park as Strategic Industrial Land, and with the wider area, (e.g. the retail parks) an employment hub;
- A new neighbourhood at Albert Basin;
- Safeguarded routes for the Thames Gateway Bridge and DLR extension, connection to the Thames Tideway tunnel, and designation of a site for a new waste management facility;
- Residential use otherwise restricted to the east of Royal Docks Road and bridge safeguarding line;
- New open space at Beckton Riverside compensating for de-designation of Metropolitan Open Land where it is in operational utilities use;
- East Beckton to continue has a convenience-oriented district centre, with limited change other than renewal, potentially within a consolidated boundary;
- A character-based approach to urban design that prioritises improvements to connectivity and the public realm; (including the district centre) addresses the transition between different land uses; examines the potential for a new conservation area; and identifies the areas with the most capacity for change and innovation as those close to stations and large industrial and commercial sites to the east and south of the area?
- y/N If no, please explain what you disagree with and suggest alternatives

We have responded to these questions in our response to question 13.

### **Royal Docks**

**70. Do you agree that the planning issues on p. 85 are the most significant locally, as summarised here:**

- There is a large amount of development land but it is subject to significant constraints (access, contamination) and both employment and residential uses are competing for the same sites;
- A number of wharves are currently safeguarded along the river, blocking access to the riverside, but wharves are important for encouraging more sustainable freight;
- London City Airport is a major employer but impacts on the local environment and constrains development; and
- The quality of the urban environment is very poor in some areas, and the area as a whole lacks community facilities and defined local centres?
- y/N If no, please explain and suggest alternatives

Yes, although the text of the Core Strategy should be much more positive about the fantastic opportunities presented by the Royal Docks. Their public transport accessibility, location, proximity to the airport and land availability provide huge scope for high quality successful development.

**71. A vision for Royal Docks is set out on p. 86. Have we got the vision right?**

y/N If no, please explain what you disagree with and suggest alternatives

Yes

**72. Spatial proposals and policy directions to help address the issues and deliver the vision for the Royal Docks are set out on p. 86. Do you agree with them, as summarised here: -**

- A new neighbourhood for Silvertown, including a new local centre, leisure, hospitality and open space;
- Designation of North Woolwich as an enhanced local centre, where improvements will be made;
- Employment hubs at London City Airport, Thameside East and West with designation of Strategic Industrial Location to incorporate Tate and Lyle and other employers at Thameside East, supporting new growth sectors;
- Consideration of the rationalisation of the protected wharves in order to make more effective use of the land;
- A character-based approach to urban design which prioritises improving the area's coherence and connectivity, addressing the transition between different land uses, and waterfront potential, (access and animation issues) and identifies the areas with most capacity for change and innovation in this context as large sites along the riverside and dockside;
- Careful consideration of future airport expansion proposals;
- Safeguarding of a new Thames river crossing point and Crossrail route; and
- Consideration of innovative delivery mechanisms such as Tax Increment Financing (TIF) or the designation of an Economic Development Zone with incentives for private sector led investment.?

y/N If no, please explain what you disagree with and suggest alternatives

LTGDC has commented on the strategic sites that are relevant to its area and does not wish to comment further in response to this question.

### **Strategic Sites**

Strategic sites are the most important opportunity areas for change during the Core Strategy plan period. There is no minimal size for a site, but they must be considered to be vital to delivering the aims of the Core Strategy.

73

Do you agree with the sites as listed on pp.85 and the time scales for their

delivery as stated in the table on pp.89-111? Y/N

If no, please explain what you disagree with and suggest and justify alternatives as appropriate

The Sites are listed at page “88” not “85”. Also the map of sites does not cover all of those listed in the schedule, e.g. open space sites. As set out above, reference should also be made to the future of the Gas holders at Twelvetrees Crescent. LTGDC would question how wise it is to include the housing typologies in the table? Would it be better for housing typologies to be set out in specific SPD? Further specific comments on sites are provided as necessary in response to the following questions.

### **Strategic site choices**

The Spatial Designations Schedule sets out a broad vision for each strategic site, in order to help understand its role within the wider vision and objectives of the Core Strategy. For some sites there are choices, while for others there is just one preferred way forward. All are reproduced below.

**74.** S01 Stratford Village: *New residential neighbourhood, (lower density) incorporating a significant proportion of family housing (high family) and ancillary uses, with enhanced connections to wider area. To be delivered over the shorter term.*

#### **Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives.

Yes

**75.** S02: Stratford Waterfront *includes part of the Stratford City development, and the Olympic Aquatics centre which will be retained with improvements of links through to the Carpenters District. Medium term choices for the remainder include:*

- 1) *Offices, together with leisure and entertainment uses*
- 2) *Predominantly residential (high density, low family housing)*
- 3) *A mix of high density residential and ground floor leisure/food and drink (high density, low family housing)*

**Which of these do you think best?** 1/2/3 or an alternative please justify your choice here.

#### **Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC understand that the site boundary in the Choices document includes some of the site of Stratford City Zone 2 which already has planning permission for offices. Changes to the land use allocation of this area would need to be considered in the wider context of the balance of uses coming forward in Stratford as a whole and its increasing role as a metropolitan centre. LTGDC understand that the land use is already relatively fixed for much of this site, as the site includes the aquatic centre and balancing ponds. LTGDC does not object to high density residential being proposed on parts of the site which are not already in, or have planning permission for, other use.

**76. S03 Olympic Quarter:** *In the medium term, scope for additional recreation and leisure uses as well as ancillary residential (high density, medium family housing) and further residential and community uses on adjacent sites. End user of stadium will affect appropriate mix of uses.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives.

Yes

**77. S04: Chobham Village** *Existing industrial area on fringe of Stratford with potential for release for other uses. This would become part of the wider Chobham neighbourhood. Medium to longer term choices are:*

*1) Residential (high density flats/houses with a high family component) and small scale flexible workspace*

*2) Residential only, (lower density flat/houses with a high family component) with emphasis on family housing.*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here.

LTGDC supports the provision of family housing. The core strategy will need to clearly set out what criteria will be used to ensure that when land is changed from industrial to residential use, both uses can exist alongside each other, and the new residential uses will have adequate residential amenity. Given the area is already in industrial use, option 1 may be easier to promote.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

Yes

**78. S05 Stratford Central:** *In the medium term, renewal and expansion of retail floorspace, residential (medium/high density, low family housing) and public realm improvements, with key aim to integrate area with Stratford City and Olympic Legacy site, ensuring a complementary offer is developed.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

Yes. Although the references to the Stratford Metropolitan Master plan, and what it says, infers it is a lot more definite and agreed than the stage the masterplan is currently at.

**79. S06: Carpenters District and Rick Roberts Way** *In the medium term, for Rick Roberts way, mixed use comprising business, residential (medium density and medium family housing) and supporting uses. There are two medium-term choices for the Carpenters Estate, to better relate the area to*

*the town centre:*

1) *Limited redevelopment of Carpenters. This would fulfil existing council commitment to redevelop the poorest quality homes whilst retaining all other existing estate housing and some limited commercial/community uses (medium density, medium family housing).*

2) *Undertaking more extensive redevelopment to create a more mixed use area across Carpenters including more extensive business uses, education and community uses alongside better quality housing (medium density, medium family housing).*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here. See below.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

### **Carpenters District**

Of the two options proposed LTGDC support option 2, extensive redevelopment. However, this should be predicated on the western entrance to Stratford Station being opened so that residents have good access to public transport.

### **Rick Roberts Way**

Support proposal for mixed use comprising business, residential and supporting uses.

**80.** S07/8 Sugar House Lane and Three Mills: *In the medium to longer term mixed use to include creative and cultural employment uses, residential, (lower density flats/houses with high family housing) community uses, supporting services and local amenity space, neighbourhood with creative, cultural employment uses. Film studios will be retained at Three Mills with improved connections to Pudding Mill, Bromley by Bow and Bisson Road.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

Support the proposed land use designation. The housing density will have to vary across the site, given the conservation area designation.

**81.** S09 Pudding Mill Lane *is currently a Strategic Industrial Location in the London Plan. North of the railway line will be reinstated as SIL post-Olympic games. South of the railway line, medium- longer term choices are:*

1) *Retain as Strategic Industrial Location*

2) *In view of strategic regeneration benefits de-designate as SIL and develop for residential-led (lower density flats/houses with high family) mixed use with supporting business, retail and community uses*

3) *As 2), but develop for employment-led mixed use.*

**Which of these do you think best?** 1/2/3 or an alternative please justify your choice here.

**Do you agree with the overall site vision incorporating these choices?**  
Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC support option 3.

**82.** S10 Abbey Mills, West Ham. *Designated in the UDP as part of a Major Opportunity Zone (MOZ) but with significant constraints (access, land ownership, possible contamination). Identified need for local shopping provision. Longer-term choices in this context are:*

*1) Residential-led (medium density, medium family) mixed use to include a link to West Ham Station.*

*2) Mixed use, providing a significant amount of employment floorspace. (medium density, medium family)*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here.

Page 95, S10 Abbey Mills.

There seems to be a lack of information provided in relation to this site. LTGDC understands that the site is in use as a mosque and there are proposals to redevelop the area to provide a new mosque, school and housing. This should be reflected in the further information section of the table. Any future use of the site should include community uses. There is also no reference to the mosque on page 32.

**Do you agree with the overall site vision incorporating these choices?**  
Y/N If no, please explain what you disagree with and suggest alternatives.

**83.** S11 Parcellforce, West Ham. Designated in the UDP as part of a Major Opportunity Zone (MOZ) but with significant constraints (access, land ownership, possible contamination). Identified need for local shopping provision. *Longer-term choices in this context are:*

*1) Residential-led (medium density, medium family) mixed use to include a link to West Ham Station.*

*2) Employment-led mixed use with emphasis linked to Cody Road industrial area. (medium density, medium family)*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here.

LTGDC consider that development of this site should be employment, not residential, led. This is because of significant development constraints including transport accessibility, the proximity of the gas holders and the railway line. It is also considered that there are good links with the Cody Road industrial estate that could benefit agglomeration of employment uses in this area.

### **Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

**84.** S12 Crown Wharf/Bidder Street. Current designation: Major Opportunity Zone and Safeguarded Wharves (Mayer Parry and Prior) and within Town Centre boundary. *Medium to longer term choices for this site, which is proposed for removal from the town centre boundary are, and includes SPD sites 10s and 10b are:*

- 1) *Retention of employment use (business, industry, warehousing)*
- 2) *Employment-led mixed use comprising business with residential (medium density, medium family, subject to resolution of environmental issues)*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here.

LTGDC support removal of this site from the town centre boundary. LTGDC consider that it may be appropriate to release the southern part of the site for employment led mixed use, but that the northern part of the area should be retained for employment use. Employment led mixed use would be more appropriate nearer the station and public transport, while retained employment use would be more appropriate and have agglomeration benefit in the north of the area, given the close proximity of Cody Road and Prologis business parks.

The ownership of the land should be highlighted in the delivery partners and phasing section. LTGDC understand the site is in the ownership of London Borough of Newham.

### **Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

**85.** S13 Manor Road. *Short-medium term choices for this site, which is proposed for removal from the town centre boundary and hence as a preferred food store site are:*

- 1) *Residential-led (medium density, medium family, subject to resolution of environmental issues) mixed use with some small commercial units fronting Barking Road*
- 2) *Residential-led mixed use (medium density, medium family, subject to resolution of environmental issues) with ancillary business use.*

**Which of these do you think best?** 1/2 or an alternative please justify your choice here.

### **Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC support the removal of this site from the town centre boundary.

However, LTGDC understand there are proposals to move Manor Road so that it runs alongside the railway line. This would mean that the site is more suitable for alternative uses as proposed. However, LTGDC consider that the Core Strategy should set out clearly that the new allocation is predicated upon this change. LTGDC also consider that the phasing should be medium to long term rather than short to medium.

**86.** S14 Canning Town Central: *In the short to medium term, expanded district centre to comprise retail (to include anchor food store), residential, (medium density, medium family housing) civic and community uses (includes SPD sites 1a, 1c and 7)*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

Yes

**87.** S15 Canning Town East: *In the short to medium term, residential (medium density, medium family housing) with supporting community and green space.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment.

**88.** S16 Silvertown Way East: *In the short to medium term, mixed use comprising residential (medium density, medium family housing), leisure and open space (includes SPD site 12).*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

Development of this site, and appropriate uses, will depend on the timescale and form of proposals for the Silvertown Crossing, which are likely to significantly affect this area.

**89.** S17 - Silvertown Way West: *In the short-medium term, mixed use comprising residential (medium density, medium family housing subject to resolution of significant environmental issues) and business (includes SPD site 8).*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

This is the "Area 8" site within the Canning Town and Custom House masterplan and SPD. LTGDC understand that emerging proposals are for high density development on this site.

**90.** S18 Limmo. *Major Opportunity Zone in UDP. Longer-term choices for this site, which includes SPD site 9 are:*

1) *Residential (medium density, medium family) and supporting uses and open space*

2) *Mixed use including residential, (medium density, medium family)*

*employment and open space*

3) *Open space/nature conservation*

**Which of these do you think best?** 1/2/3 or an alternative please justify.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC consider that use of this site for open space with enabling residential development should be encouraged. The Lea River Park framework and Canning Town and Custom House masterplan contain some further information. A bridge would be needed to link the site to Silvertown Way and site S17.

**91.** S19 and 20 Gallions and Ivax (Albert Basin). *Allocated as Major Opportunity Zone in the UDP. SPG supports residential and employment uses with supporting community, leisure and local scale retail. Choices for both sites are:*

1) *As per SPG with medium density, medium family housing.*

2) *Reinforce role of area for employment use and extend Beckton SIL to incorporate existing industrial uses in northern part of the site.*

**Which of these do you think best?** 1/2 or an alternative please justify your choice.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

Existing residential in the area would become more isolated if the Beckton SIL is extended. However, it is not the most appropriate location for further family housing, especially if the airport is extended in the future. An alternative would be to develop the area for student housing and other community uses associated with the nearby university.

**92.** S21 - Silvertown Quays currently designated as part of Major Opportunity Zone in the UDP, and subject to ongoing planning proposals. *Medium to longer term choices are:*

1) *Mixed-use comprising visitor attraction, residential, (medium density, medium family) local centre, leisure and recreation.*

2) *Employment-led mixed use with focus on green industry with some residential (medium density, medium family) and a local centre.*

**Which of these do you think best?** 1/2 or an alternative please justify your choice.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC consider that at this site there is the potential for significant elements of both employment and residential use. Under the first choice LTGDC suggest that a “visitor attraction” is made to be less definite than suggested. The proposed aquarium is a not viable and LTGDC cannot envisage other visitor attractions that may be successful.

**93. S22 - Minoco Wharf:** *In the short term, mixed use to include residential (medium density, medium family housing), business and supporting community uses, to link up with Barrier Point and Park and Silvertown Quays to create a new neighbourhood.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

The text in the table should refer to the permitted scheme for Minoco Wharf (which will not now be implemented). The site name should be changed from Minoco Wharf to 'Minoco' to reflect the larger site where pre application discussions are ongoing. (This also applies to the earlier sections in the document on 'Silvertown' and 'Thameside West'). There is a primary school and a secondary school proposed as part of the development. Should some of this site therefore be allocated for education uses? See also earlier comment in response to question 16.

**94. S23 Thameside West:** *Currently designated in UDP as part of MOZ7, for leisure/residential uses, part employment, business, industry and warehousing uses, part green space, four safeguarded wharves, part safeguarded for potential river crossing. A strategic industrial location in the London Plan for business, industry and warehousing uses. Longer term choices for this site include:*

*1. Retention of SIL/PEA designation (Excluding Minoco Wharf) and green space.*

*2. Rationalisation of wharf designation and release of part for mixed uses including residential (medium density medium family housing)*

**Which of these do you think best?** 1/2 or an alternative please justify your choice.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

LTGDC support option 2. The findings of the Employment Land Review seem rather cautious. The Lower Lea Valley OAPF proposed release of 40% of employment land, should this be taken into account as a GLA strategic document? As set out in response to question 93, the Minoco proposal is now much more extensive than the earlier Minoco Wharf planning permission.

**95. S24 - Woodgrange Road West:** *In the short-medium term, mixed use comprising retail, residential (medium density, medium family housing) community and business; limited intensification of development to take advantage of opportunities offered by Crossrail.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment.

**96. S25 - East Ham Market:** *In the medium term, retail development with residential (medium density, low family) leisure and community uses, in line with vision in Successful Places section.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment.

**97. S26 - East Ham Town Hall Campus:** *In the medium term, mixed use with offices, residential (medium density/low family housing) and community uses, taking into account conservation area and listed building designation.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment.

**98. S27 - Queens Market:** *In the medium term, mixed use comprising retail including retention of market use, residential (medium density, low family housing) and community.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment.

**99. S28 Custom House/Freemasons -** *Provision of enhanced local centre, maximising potential of Cross Rail station. Longer-term remaining choices are:*

*1) Increased business use.*

*2) Increased residential use (medium density, high family).*

**Which of these do you think best?** 1/2 or an alternative please justify your choice.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

In general, LTGDC consider that that the policy approach could be more positive about the huge benefits that Crossrail will bring to the borough and the opportunities presented by such great improvements to public transport accessibility. LTGDC consider that both increased business use and increased residential use would be acceptable in this location.

**100. S29 North Plaistow:** *in the long term, new local centre to include retail, residential (medium density, medium family housing) and community uses.*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

No comment

**101. S30 Royal Victoria West:** *In the short to medium term mixed use including business, leisure and visitor attraction*

**Do you agree with this vision?**

Y/N If no, please explain what you disagree with and suggest alternatives

LTGDC support the vision, however this is also a site that will be impacted upon by any new Silvertown crossing, and the text should reflect this.

**102.** S31 Royal Albert North. Large site currently designated as Major Opportunity zone in UDP, with new Council offices. *Longer-term choices to form part of mixed use development including green space (link to Beckton Park) are:*

1) *Green Industries (B1 research and development and light industry to support Green Enterprise District) linked with higher education function at UEL.*

2) *Tourism, leisure and small scale retail uses linked along dock edge.*

3) *Mix of both.*

**Which of these do you think best?** 1/2/3 or an alternative please justify.

**Do you agree with the overall site vision incorporating these choices?**

Y/N If no, please explain what you disagree with and suggest alternatives.

No comment.

### Temporary Uses

**103. Having considered the visions and choices for the strategic sites outlined above, do you consider that there are any specific temporary uses that may be suitable for particular sites to help bridges the gap to longer term visions?**

Y/N If yes, please specify the uses and the sites that they may be suitable for.

No comment.

## **Other matters not addressed by the consultation questions:**

### **Key Diagram**

LTGDC consider that the mapping of these designations could be improved. For example, the Lea River Park is identified as OS9, but it does not come through on the diagram that this open space runs the length of the Lea Valley. Bromley By Bow Gas Works have not been identified as a Strategic Site or as new open space on the key diagram. The Lea River Park framework suggest that this site could become a regional destination site (on a scale similar to the Eden project) for the Park. LTGDC understand that the gas works are likely to be decommissioned within the life of the plan (i.e. before 2027) so therefore the Core Strategy should identify the gas holders as new open space and / or a strategic site, and options for their future use should be set out in the strategy. The way the borough is mapped, also means that the borough is shown as an 'island' and its position as part of East London does not come across. LTGDC consider indicative locations for new bridges across the Lea, for example from Sugar House Lane to Bromley by Bow, should be shown. The diagram is not easy to interpret, and the key interventions do not come across clearly.

### **Delivery and Planning Obligations or Community Infrastructure Levy**

There is very little in the choices document about the approach the Borough will take to planning obligations or CIL, and how these mechanisms will be used to deliver infrastructure. A further version of the core strategy should be clear about the approach that will be taken to planning obligations, and the borough's timescales for implementing CIL. The LTGDC's Planning Obligations Community Benefit Strategy has been operating very successfully throughout the Lower Lea Valley over the past few years, and will continue to apply until March 2014 (or until Boroughs introduce CIL). Support for the LTGDC Strategy should be included in the next version of the Core Strategy.

### **Compulsory Purchase Powers**

Use of Compulsory Purchase Powers (by LTGDC or London Borough of Newham) is also not mentioned in the document. Compulsory Purchase Powers are an important tool available to authorities to implement their regeneration objectives, and help ensure development in accordance with their LDF comes forward. The next version of the core strategy should refer to Compulsory Purchase Powers and how they may be used.

### **Regeneration and the Arc of Opportunity**

Assessing the borough on the basis of the Community Forum Areas, whilst understandable in some respects, does mean a certain loss of focus for some of the main regeneration themes e.g. Lower Lea Valley. This is disappointing given the momentum which has built up around the regeneration of the area as a whole, not just the Newham area of the valley.

The next version of the core strategy could more clearly set out what has already been achieved in the 'Arc of Opportunity' and how regeneration of the area is ongoing. At present, the emphasis on neighbourhoods and the mapping of Newham does not set the strategy within its context very well. Also the Cody Road area being coloured as part of the Arc of Opportunity is not very helpful as it

indicates that there will be change in the area, whereas LTGDC understands that this successful industrial area is to be retained as existing.

The next version of the Core Strategy should refer to the emerging proposals regarding the Mayoral Development Corporation. The current role of LTGDC and the LDA and future arrangements is also not referenced.

### **Priorities**

LTGDC consider there should be more about priorities set out in the next version of the core strategy, both in terms of themes and locations. Even in buoyant economic times development does not all happen at once. Given the strategy now runs to 2027 priorities should be proposed for different time frames.

### **Spatial Designations Schedule**

T4 – Should be called the ‘Barking and Royal Docks Bus Corridor’ and shown as a proposal on the key diagram.

T7 – As set out above there is no mention of Dagenham Dock extension to the DLR. The extension is referenced elsewhere in the text of the strategy so may be an oversight. However, officers note that the extension is not included in either the key diagram or the Transport Connection diagram on page 10. The DLR route should be indicatively shown, as Crossrail is. LTGDC have refused planning permission for a development in Beckton (LTGDC -09-005-REM) on the basis that the development would occupy the DLR route, and this would prevent the Newham LDF being in line with the London Plan.

### **Terminology**

There is reference throughout the document to our residents and new residents. You could read “our residents” as being existing and the document in various places stresses the need to attract and retain new residents. It should be clear that “our residents” includes existing and new residents.