4.1 Quality of Design: Are the Successful Places policies (SP1-6) justified and sufficiently robust to meet not only existing challenges but those which could arise from the likely intensification of development over the plan period? Do they accord with the national core planning principles, as expressed in paragraph 17 of the Framework?

Are policies justified and sufficiently robust?

The Successful Places policies (SP1 – 6) were drawn up with full reference to the National Planning Policy Framework (NPPF) and the London Plan, and were prepared on the basis of a comprehensive evidence base. The evidence base includes:

- Newham Character Study 2018 (EB07);
- Tall Buildings Evidence Base 2017 (EB08);
- Tall Buildings Study 2018 (EB09); and
- The Town Centre and Retail Study 2016 (EB04)

The Plan has been subject to two rounds of formal public consultation (under Regulation 18 and Regulation 19 of the Town and County Planning (Local Planning) Regulations 2012) as well as numerous informal consultation processes during plan-making. In addition, the impact of policies on identified objectives, has been tested at various stages of the process via an extensive Integrated Impact Assessment (IIA) (SD04)). See the Council’s response to Matter 2.1 for further detail on this. Generally, however the policies robustness is demonstrated by the Review indicating, and consultation confirming, that other than SP4, they needed little substantive change since they were adopted in 2012, despite the introduction of the NPPF, its proposed review in 2018, and new versions of the London Plan. The Options Appraisal (SD06) demonstrates that the Successful Places policies which have recently been supplemented by the Detailed Sites and Policies Development Plan Document are on the whole performing well and continue to be supported by stakeholders (notably town centre quality and distinctiveness, design quality, regeneration initiatives, control of tall buildings and development of key corridors).

Probable intensification of development over the plan period arises through population growth and consequent likely changes in national and regional policy. The draft National Planning Policy Framework published in March 2018 states that local plans should optimise the use of land through the use of minimum density standards for city and town centres (and other parts of the plan area) where there is a shortage of land. Similarly, the draft London Plan (2017) envisages a design-led approach to optimising density which is to be based on an evaluation of the site’s attributes, public transport accessibility, its surrounding context and capacity for growth and the most appropriate development form, which are determined by following the process set out in Policy D2 Delivering good design. The density guidance in the current plan policy 3.4 ‘Optimising housing potential’ set out in ‘Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)’ are to be abandoned. Proposed housing schemes that do not
demonstrably optimise the housing density of the site’ in accordance with
the new policy should be refused.

The current Local Plan does not contain density guidance at a local level,
and the Successful Places chapter comprises policies covering a far wider
breadth of considerations pertaining to good design. The density
guidance in the current London Plan has been an important material
planning consideration in decision-making at Newham nonetheless the
guidance has in many cases been outweighed by other considerations
concerning high quality design and affordable housing provision.

Intensification of development will mean not just likelihood of higher
densities than had been experienced heretofore but greater complexity in
the development proposals coming forward. Intensification is also likely
to mean greater building heights and the bringing together of contrasting
land uses. The Local Plan plans for a mixed use borough so that existing
policies in the plan already address the planning considerations that will
arise. This includes issues of neighbourliness and the agent of change
approach which seek to accommodate and manage a range of land uses in
the borough (SP1 ‘Borough-wide Place-making’, SP3 ‘Quality Urban design
within Places’ and SP8 ‘Neighbourliness’). Similarly, the Local Plan
contains a comprehensive policy for the management of tall buildings in
the borough to ensure the impacts of height and associated design are
fully explored (SP4 ‘Tall Buildings’). Policy SP2 ‘Healthy Neighbourhoods’
sets out an expectation for good space standards (internal and amenity)
at residential developments to reduce stress. Whilst Policy H1 ‘Building
Sustainable Mixed Communities’ seeks to ensure that all new homes meet
the internal and external space standards of the London Plan as a
minimum and that housing densities will reflect local context and
character.

The challenges to development management that intensification will bring
are already addressed by the tools and approaches set out in the Local
Plan. Newham as an inner London borough has faced pressures for high
density development/ general intensification particularly in the Arc of
Opportunity for some time, though in Urban Newham there may have
been some issues with underdevelopment of small residential sites in an
effort to avoid the threshold for affordable housing which the new
emphasis on intensification will spotlight. Existing policies in the plan SP1
and SP3 are reinforced, to secure the best use of sites across the
borough.

The review of the Successful Places policies has taken place in this context
of local decision-making in which proposals which secure maximum
benefit from development are encouraged. The policies in the Local Plan
are considered robust in taking forward the potential challenges presented
by the likely policy changes at London and national level with regard to
intensification of development.
Do policies accord with the national core planning principles as expressed in paragraph 17 of the framework?

The NPPF states that within the overarching roles that the planning system ought to play, a set of 11 core land-use planning principles should underpin both plan-making and decision-taking. The Successful Places policies were formulated following the guidance set out in the principles.

<table>
<thead>
<tr>
<th><strong>NPPF principle</strong></th>
<th><strong>How the Local Plan complies with the principle</strong></th>
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<tr>
<td>Principle 1: Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;</td>
<td>The Local Plan puts in place a plan-led framework of place-making policies that are concisely stated and build on the overarching objectives of the plan to optimise development opportunities and to create high-quality places and stable, mixed and balanced communities where people choose to live, work and stay. The submitted Newham Character Study 2018 (EB07) was the subject of an engagement exercise with the borough residents at the 2017 Mayor’s Show concerning aspects of character (broadly defined) that they liked and disliked in the neighbourhood, which is reflected in spatial and SP policies. The policies are supported by a contemporary evidence base and stem from the current national and regional policy context. The policies were formulated on the basis of public consultation and engagement with duty to co-operate partners and stakeholders. The policies address pertinent local issues around place-making in Newham. The policy framework ensures certainty and assurance to developers and householders in the borough in pursuing development proposals.</td>
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Principle 2: Planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives; | The Successful Places policies have not been formulated to stymie development in the borough but are intended to encourage imaginative and creative place-making initiatives focused on achieving high-quality outcomes; prescriptive processes which may not highlight all the planning factors worthy of consideration do not form part of the policy framework. Policies SP1 ‘Borough-wide place-making’, SP3 ‘Quality Urban Design with Places’, SP4 ‘Tall Buildings’ and SP7 ‘Quality Movement Corridors and Linear Gateways’ and the other policies emphasise the ability of development proposals to improve the environment for the benefit of ordinary people. |
**Principle 3:** Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

The Successful Places policies, notably SP3 which focuses on mixed use development should be read in conjunction with the Jobs, Business and Skills policies in the Local Plan which foster good, sustainable growth in the borough. By ensuring the enhancement of the borough’s built and natural environment the Successful Places policies take forward its economic development and regeneration. Similarly, the Housing policies seek the delivery of quality and varied new homes in the borough to provide for local and strategic needs arising from population and economic growth; in turn creating high quality, safe and secure places, with stable, mixed and balanced communities that work.

**Principle 4:** Planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

The Successful Places policies are specifically aimed at securing optimal design in the borough by means of policies SP1 ‘Borough-wide Place-making’ and SP3 ‘Quality Urban Design within Places’. Policy SP8 ‘Ensuring Neighbourly Development’ seeks to ensure that new developments do not intrude on the amenities enjoyed by existing occupiers.

**Principle 5:** Planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

The Local Plan provides a spatial strategy and strategic framework for the borough’s neighbourhoods in the Spatial Policies section of the plan. The Successful Places policies take forward the vision set out in the spatial section by setting out expectations for high quality development which will enhance the positive elements and distinctive features of the borough. Policy SP1 ‘Borough-wide place-making’ recognises the different character of distinct parts of the borough. Policies SP3 ‘Quality Urban Design within Places’ and SP5 ‘Heritage and other Successful Place-making Assets’ emphasise analysis of local character and appropriate response to local character in development proposals. Policy SP4 ‘Tall Buildings’ seeks to manage the impact of high-rise development on local character. Policies SP6 ‘Successful Town and Local Centres’ and SP7 ‘Quality Movement Corridors and Linear Gateways’ seeks to ensure new developments are designed to respond to strengths and weaknesses of local character.
### Principle 6: Planning should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

The draft Successful Places policies cross-reference Sustainability and Climate Change policies in the Local Plan. The Successful Places policies are intended to carry forward the latter policies’ objectives in the plan of delivering good growth through mixed use, sustainable development.

### Principle 7: Planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

Implementation of the draft Successful Places policies support re-use of brownfield land in delivering high quality, sustainable development in the borough. Newham is an inner London urban borough. The majority of its land area has already been intensively developed in the past for a wide variety of uses including heavy industrial uses related to the docks. Consequently, all the strategic sites in the Local Plan constitute brownfield development as do almost all other sites coming forward for development. The Successful Places policies complement the operation of the Sustainability and Climate Change policies in the Local Plan in securing sustainable development on brownfield sites.

### Principle 8: Planning should promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

Planning Policy SP1 ‘Borough-wide place-making’, SP3 ‘Quality Urban Design within Places’ and SP8 ‘Neighbourly Developments’ promote mixed use developments to engender balanced communities and places that people feel proud of. The adoption of the ‘agent of change’ principle ensures that the operation of existing uses is protected. The potential of open land is specifically referred to in Policy SP1 ‘Borough-wide place-making’.

### Principle 9: Planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

This principle goes to the heart of the Successful Places policies. Policy SP5 ‘Heritage and other Successful Place-making Assets’ is focussed on the protection, conservation and enhancement of natural, cultural, architectural and infrastructure assets. The other Successful Places policies support the revaluation of the borough’s heritage assets.

### Principle 10: Planning should actively manage patterns

Successful Places policies SP1 ‘Borough-wide place-making’, SP3 ‘Quality Urban Design within Places’ and SP8 ‘Neighbourly Developments’ promote mixed use developments to engender balanced communities and places that people feel proud of. The adoption of the ‘agent of change’ principle ensures that the operation of existing uses is protected. The potential of open land is specifically referred to in Policy SP1 ‘Borough-wide place-making’.
of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

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<th>of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and</th>
<th>Design within Places’ and SP7 ‘Quality Movement Corridors and Linear Gateways’ focus on the importance of providing legible, connected networks of streets, spaces and parks conducive to travel on foot and bike (SP3). Policy SP1 seeks well-connected and integrated series of successful and mixed use places. Policy SP8 specifically promotes the borough’s principal streets through the application of improving and regenerative quality urban and architectural design and public realm interventions. These policies work alongside and carry forward Infrastructure policies INF1 ‘Strategic Transport’ and INF2 ‘Sustainable Transport’ elsewhere in the Local Plan. The Local Plan at policy INF5 ‘Town Centre Hierarchy and Network’ promotes and manages a place hierarchy in the borough as part of an interrelated network of retail and associated service provision across town and local centres recognising their accessibility for a variety of social and economic functions.</th>
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<td>Principle 11: Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</td>
<td>Successful Places policy SP2 ‘Healthy Neighbourhoods’ recognises the role of planning in promoting healthy lifestyles and reducing health inequalities through the creation of healthy neighbourhoods and places. The following factors are required to be addressed in implementation of the policy: promotion of healthy eating; improvement of air quality; improvement of employment levels and reduction of poverty; housing quality; crime and fear of crime; improved health facilities; promotion of walking and cycling; improved open space and sports facilities; promotion of Newham University Hospital. Major planning applications are now required to be accompanied by a health impact assessment. Policies SP1 ‘Borough-wide place-making’ and SP3 ‘Quality urban design within places’ emphasise mixed use developments which enhance the attractiveness of the borough as somewhere to live, work and stay. SP5 ‘Heritage and other Successful Place-making Assets’ recognises the role of arts and culture-led regeneration. Policies SP1 and SP3 ‘Quality urban design within places’ as well as policy SP2 ‘Healthy Neighbourhoods’ promote health resources and facilities as part of a balanced mix of uses in the borough. The Successful Places policies balance the implementation of Infrastructure policy INF8 ‘Community Facilities’ in coordinating the delivery and retention of community facilities in the borough.</td>
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4.2 Tall Buildings: Is policy SP4 justified, in particular:

(i) Is the policy definition of tall buildings to be “of 6 or more storeys” appropriate for Newham? If not, what is an appropriate and justified definition for tall buildings in Newham?

The submitted EB09 Tall Buildings Study 2018 states that ‘In the context of Newham, a borough mainly characterised by large areas of low rise two-storey housing within a predominantly flat landscape, it is considered both necessary and useful to define a tall building. A ‘tall building’ is considered to be: any building of six or more storeys in height equivalent to approximately 18.6-20.15m in height.’

Draft London Plan policy D8 ‘Tall Buildings’ states that based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.

Current London Plan policy 7.7 ‘Location and design of tall and large buildings’ defines ‘tall and large buildings’ as being ‘those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor’. The difficulty for Newham with this definition is that it would mean that many proposals for tall buildings especially in the Arc of Opportunity would fail to qualify as tall buildings given the prevailing character of some parts of the borough. Some tall building proposals it could be argued would fall outside the remit of the policy altogether.

The Options Appraisal concluded that ‘A definition of ‘six or more storeys’ removes this element of doubt, and allows a full consideration of character in all cases. Whilst the I&O document suggested that there could be a taller height benchmark in the Arc of Opportunity, given that this encompasses some lower density areas, it is judged to be more appropriate and effective to have a singular definition.’

The threshold of six storeys derives from the previous operation of the SP4 ‘Tall Buildings’ policy which observed that in much of established Urban Newham, five storeys may be considered tall. The matrix of ‘Indicative appropriateness of tall buildings across different parts of the borough’ which formed part of the policy set five to eight storeys as the lowest category of tall building. Five storey buildings comprising a four storey block and a setback upper floor are a common form of development in Urban Newham. It was considered that setting the bar at five storeys would be too low but six storeys was felt to be a marker for a taller element with a different character.

The local context of Newham is generally that of low-rise urban development over level ground. The borough’s topography is flat with a gentle rise in levels from the river Thames northwards towards the boundary with Waltham Forest. There only a few raised features in the borough which include the Beckton Alp and the Greenway.

The modal building height in Newham is two storeys. Being an inner London borough there are nevertheless a large number of tall buildings of significant
height at various locations. These tend to be Council tower blocks at sporadic locations throughout the borough and groups of tall buildings in town centres and at strategic sites.

Where tall buildings occur elsewhere in the borough, they tend to be not more than three to five storeys higher than their neighbours. In the Newham context, a six-storey building is therefore outstanding at most locations outside those town centre and strategic site locations where tall buildings of equivalent or greater height have already established a presence. And in the latter locations a six-storey threshold will ensure that new tall buildings will fall to be considered under the policy.

Overall, Policy SP4 is a nuanced and comprehensive policy which elaborates a progressive approach to tall buildings in the borough. The definition of a tall building as more than six storeys serves as a prompt for careful scrutiny and assessment of the planning considerations that are particularly relevant to this form of development. The definition should not therefore be seen as a constraint as there will be many locations where a tall building can be justified under the policy.
(ii) Is the general focus of the Plan to enable tall buildings in certain town centre locations, such as Stratford Metropolitan Town Centre, appropriate?

Policy SP4 ‘Tall Buildings’ does not intend to focus the location of tall buildings in certain town centre locations only. The policy sets out a plan-led approach to tall buildings that will ensure tall buildings contribute to best effect in promoting regeneration and creating successful places at a variety of strategic sites throughout the borough.

The policy’s spatial strategy sets out that the tallest buildings of 20 or more storeys will be focused on Canning Town and Stratford town centres. This recognises the Council’s aspirations for Stratford which has recently received Metropolitan status with potential to rise to International status, and for Canning Town which has potential to be a Major centre as a result of major regeneration initiatives, as well as their excellent transport connections. It then sets out that tall buildings of less than 20 storeys will be directed to other Strategic Sites in the borough several of which are indeed located in town centres, but which are also more significantly distinguished by high levels of public transport accessibility or programmed improvements to this, and the scope for masterplanning that can accommodate tall buildings in the most appropriate manner. Importantly, Urban Newham town centres whilst having some scope for tall buildings have greater character constraints affecting their sensitivity to tall buildings compared to Stratford and Canning Town town centres. The policy also refers to the concept of tall buildings reflecting a ‘place hierarchy’ such that not only is there a distinction between Stratford and Canning Town as centres in the Arc of Opportunity with the best public transport accessibility and other town centres with a lower rise context, but also between centres and their hinterlands, and between town and local centres. Post-submission minor amendments further clarify some of these points.

This approach is in accordance with spatial visions, place-making and good design policies (S1-6 and SP1, SP3, SP5, SP6) and transport/social infrastructure-led capacity principles, (INF2, INF9, H1) as well as reflecting the concern of Policy INF5 to secure the redefinition and management of Newham’s town centre hierarchy and network. It is also in line with London Plan policy 7.7 and Historic England guidance\(^1\) which both emphasise public transport accessibility, and identifying areas of sensitivity, inappropriateness and appropriateness that tall buildings, with the London Plan directing town centres with good public transport access and Areas of Intensification and Opportunity Areas as initial areas of search. Similar principles are also reflected in the draft London Plan policy D8, and both London Plan policies also emphasise the housing and regeneration potential of such buildings.

\(^1\) Historic England in Advice Note 4 ‘Tall buildings‘: notes the value of a tall buildings strategy ‘linking to the transport strategy for the area (the relationship to transport infrastructure, aviation constraints, the capacity of public transport, the quality of links between transport and the site, and the feasibility of making improvements, where appropriate, all need to be part of the wider consideration of tall buildings)’
This spatial strategy is based on an analysis of character, sensitivity and capacity, including the overall spatial vision for the borough, and an understanding of the strengths and weaknesses of tall buildings including those already in place. The submitted EB07 Newham Character Study (2018) provides a good indication of what kind of change needs to happen and where in order to fulfil design and heritage objectives to help contribute to the creation of successful places and sustainable communities. It recognises that many parts of the borough have capacity for change and innovation based on masterplanning and an understanding of heritage, context and other design cues, and that in such locations tall buildings can be integrated into their surroundings in a way that cumulatively contributes to borough-wide place-making (including town centre vitality and viability, and the viability of enhanced infrastructure investment) and London’s skyline. Conversely, the Study acknowledges that parts of the borough are sensitive to change where new developments must be carefully handled. The study warns that the uncoordinated location of tall buildings and excessive height could damage the appearance and the character of the borough, its legibility and its hierarchy of centres as well as setting precedents for further poor development. This justified the Strategic Sites and town centre focus to the policy, which was then followed through into the EB09 Tall Buildings Study 2018 which carries forward such principles into site level analysis reflecting where in such sites taller elements should be located, as well as overall heights.

It should also be noted however, with regard to potential tall buildings at other places with good public transport i.e. outside Strategic Sites, the revised Local Plan policy SP4 states that such ‘windfall’ locations may be acceptable if there is good public transport access with a minimum PTAL score of 4 and the opportunity to create generous public realm. Proposals at such locations will be required to meet the same detailed and comprehensive expectations for all new tall buildings in the borough which are set out in part 3.a and 3.b of the policy ‘Design, Management and Technical Criteria’. This reflects similar principles to the evidence base and broader policy approach discussed above, acknowledging that smaller scale opportunities may nonetheless occur outside of the main areas of focus for tall buildings.

Therefore, the tall buildings spatial strategy emphasising public transport accessibility and place hierarchy is supported by local evidence in the submitted EB07 Newham Character Study (2018) and the EB09 Tall Buildings Study and is further considered to be appropriate in the context of regional planning policy for tall buildings and national guidance, as well as the plan’s broader strategic approach.
(iii) Should the policy be extended to other places with good public transport access?

This question is addressed in Matter 4 Question 2 (ii) above.
(iv) Should the heights of tall buildings be subject to a more flexible/less prescriptive interpretation, such as a range of heights, for example with should each tall building proposal be determined through a set of parameters and/or a masterplan?

The Council seeks to ensure a plan-led approach to all new tall buildings in the Borough. This policy was first adopted in 2012, reflecting concern that tall buildings had been allowed to proliferate particularly in the Stratford area in a way that was undermining place-quality. A fundamental part of this strategy is to adopt a spatial direction in respect of tall buildings which reflects capacity for and sensitivity to innovation (as per the Character Study) and promotes a hierarchy of place in the borough, reflecting town centre and transport hub status, and the need to mark certain locations within a place to aid legibility. In a refinement to the existing Policy based particularly on member and officer feedback about policy implementation, each Strategic Site has been given an indicative height range, and a height for any taller/tallest element, plus guidance as to what within that site should be marked with height; this provides an ‘initial sift’ for appropriateness against the spatial strategy and other key aspects of Policy SP4.

The indicative heights for tall buildings in each Strategic Site are based on an analysis of the relevant planning, heritage and transportation considerations relating to capacity, sensitivity and legibility for each of the Strategic Sites as stated in paragraph 4 of the EB09 Tall Buildings Study (Feb 2018) submitted as part of the evidence base:

Appropriate building height ranges at locations which accord with the above criteria [note: these are appropriate location and acceptable impact on local character] are then derived from the particular characteristics of the individual Strategic Site in the context of the characteristics and legibility of each community neighbourhood as identified by the Character Study based upon an examination of topography, views, heritage, public transport accessibility, and character including current tall building presence. Analysis also reflects on consultation responses to the Local Plan Review, including advice from Statutory Consultees/Duty to Cooperate Partners and developers undertaking more detailed masterplanning exercises, as well as drawing on the independent advice of the Design Review Panel in relation to planning applications and pre-application advice for tall buildings schemes in the area.

The term ‘indicative’ denotes the expectations that such heights will be refined through masterplanning involving detailed design testing, as per the technical criteria in SP4:3, and that this will enable the demonstration of the appropriateness of the final scheme relative to lower rise alternatives. The indicative heights therefore provide the parameters for scrutiny – clear benchmarks for designers to work with and officers and members to use to interrogate the end proposal against the policy’s expectations.

Therefore, it is not considered that the indicative heights for Strategic Sites set out in Appendix 1 and for the Tall Building Areas at Stratford and Canning Town
are overly prescriptive, but rather that they reflect the natural evolution of a plan-led approach to tall buildings and its interface with the detailed design process.
(v) How valid are the concerns that tall buildings cause alienation, or is this a matter that can be overcome by sensitive design?

Paragraph 6.37c of the Justification to Policy SP4 recognises valid concerns that ‘a poorly designed tall building may create an isolated mono-community with little social interaction within the community and with the wider community’; and that ‘here may also be problems of ‘ownership’ and intensity of use of communal areas if not designed in such a way as to secure communal responsibility and ensure durability.’ This reflects widely reported perceptions and concerns expressed by residents, home seekers and those commissioning higher density schemes, the most frequently cited being aversion to living in a tower block, not knowing neighbours, overcrowding and lack of privacy, particularly for families.

Psychological studies have also found that those living in high-rise housing developments are typically more stressed than those living in low-rise housing: a meta analysis in 2007 of 99 studies on the impacts of tall buildings on their occupants for instance found that only 17 measured a positive outcome for the research question; 55 measured negative effects, and 27 were mixed or neutral. Across these different categories, a large number of studies found that people living in high-rise buildings suffer from greater mental health problems, higher fear of crime, fewer positive social interactions, and more difficulty with raising their children.

Paragraph 6.37d further explores the implications of tall buildings for neighbouring occupiers and the wider community. Issues of local wind flow disruption, temperature reductions at pedestrian level around tall buildings, over-shadowing and street pollution flushing effects will have implications for the amenity of those living or working in or around the buildings; and an inappropriate tall building can seriously harm the qualities that people value about a place, disrupting rather than enhancing place character.

The Council’s view (and indeed reflected by recent engagement with residents on tall buildings) is that a new tall building need not be alienating if it carefully designed in line with comprehensive policy tests set out in Policy SP4:3 notably early consideration of management of communal spaces, design credibility/build quality, contribution to mixed and balanced communities and integration with local context, in conjunction with the expectations for inclusive, community focussed design in Policy SP3 and healthy urban planning in SP2. In doing so consideration is given to the living conditions that will result both for the building’s residents and nearby existing occupiers, and the influence on design for the potential of its residents to interact with the local community. In this regard, the expectations for housing mix and affordable housing (H1, H2) set out in the Local Plan will also be particularly relevant.

Alienation remains a risk with large scale development but good design goes to the heart of the matter. Innovative and people-focussed design as part of a masterplanning process can result in measures which are protective to people’s

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mental health such as green spaces and opportunities for social interaction. The issue is not so much the height of the tall building but its insensitive design which Policy SP4 and the allied Successful Places policies seek to address by setting clear parameters for the assessment of tall buildings.

However, it is pointed out in paragraph 6.37e that many of the benefits of tall building in terms of density and visual quality can be readily obtained in lower development. Mid-rise development offers opportunities to avoid some of the social and other problems that can detract from tall buildings hence the attention given in the policy to explorations of mid-rise as an alternative approach to development. Many urban design studies have identified mid-rise housing, typically no taller than eight storeys high and supported by community and commercial infrastructure as giving the benefits of sustainable living without the mental health costs.

It should be remembered that mid-rise is still a form of high rise housing and in the Newham experience has been combined with taller elements in the comprehensive development of Strategic Sites to give a balanced range of housing units and forms in line with the East Thames Toolkit guidance mentioned above. The Policy therefore further encourages the exploration of mid-rise and lower rise high density formations as part of the design testing and overall scheme mix and emphasises the importance (at SP4:3b) of demonstrating the added value of the final scheme heights against lower rise alternatives. A proposed minor amendment emphasises the importance of considering the arrangement of block sizes and various height mixes as part of the design testing and justification process.

In drafting the revised SP4 ‘Tall Buildings’ policy therefore, the Council was fully aware of the importance of addressing the special difficulties high rise proposals present to social integration given the Local Plan’s objective to optimise development for the benefit of new and existing communities. The policy aims to ensure that the negative social and psychological aspects of tall buildings briefly outlined above are avoided.
(vi) Is the tall buildings matrix (Table SP.A) still required or is it superfluous?

It is noted that four of the six rows which originally made up Table SP.A ‘Indicative appropriateness of tall buildings in the borough outside Strategic Sites’ have been deleted as this is now handled through Strategic Site allocations. The matrix was nevertheless retained in the Local Plan review because it was felt it could be of assistance in agreeing appropriate height for tall buildings at ‘windfall’ sites outside Strategic Sites in both Urban Newham and the Arc of Opportunity where high rise development had not been previously anticipated.

On reflection, the policy refinement that has occurred through Local Plan Review provides sufficient guidance to such proposals without the table: the amended policy SP4 now sets out a comprehensive set of expectations for tall buildings at all locations. Having initially passed the requirements for a PTAL score of 4 and scope for the creation of generous public realm, any new proposal for a tall building will be required to address in its development integration with local and historic context, impact on streetscape including public realm and Key Corridor objectives, and impact on near and distant views and skyline amongst other criteria. The assessment of a tall building proposal at a non-strategic site will therefore be on its individual merits within the terms of the revised policy rendering the matrix superfluous.
4.3 Successful Town and Local Centres: Are policies SP6 and INF5 justified, effective and in accordance with national policy, for example as expressed in section 2 of the Framework? In particular:

(i) Is there a need for greater locational and/or qualitative guidance for retail development within or adjacent to town centres or elsewhere?

Local Plan policies SP6 – Successful Town and Local Centres and INF5 – Town Centre Hierarchy and Network are comprehensive policies containing both locational and qualitative criteria and are designed to complement each other, INF5 focussing on town centres as part of an infrastructural network and hierarchy, and SP6 focussing on them as places in their own right, and as important components of wider successful places. In doing so, they address different parts of section 2 (primarily paragraph 23) of the NPPF. SP6:1.a recognises that town centres should be vibrant and vital and valued as component of local neighbourhoods; SP6:2c and d encourage a diversity of uses, including residential as appropriate to the size and function of the centre, a robust retail core, a variety of unit sizes and markets to provide choice and meet local needs. The prevention of non-retail use proliferation from clustering or reaching disproportionate levels within the centre is also dealt with through Policy SP6:2e. SP6:2.f requires that centres be managed as part of a clearly defined network and hierarchy, in line with Policy INF5:2.k which directs new town centre uses to the designated Town and Local Centres first, as appropriate to their scale, with a clear indication of each centre’s role in the hierarchy and needs to retain or elevate that role. Policy INF5:3.a also sets out the requirement for impact assessments to be submitted with any application for out of centre retail or other town centre uses over 300 sq.m net (sales floorspace) as per paragraph 26 of the NPPF.

In turn these policies relate back to the spatial policies which contain overarching spatial visions for these centres (relating to their particular character, assets and opportunities analysed in both the Retail and Character studies) to direct incremental and strategic change and clarify their role in other spatial strategies (e.g. intensification at transport nodes). Other complementary spatial strategies are to be found in J1, (reflecting, that retail is also employment-generating activity) and SP7 (reflecting the linear nature of many high streets and ribbon commercial development beyond them). In addition, Stratford Metropolitan Centre (Stratford Central – S05), Forest Gate District Centre, Green Street District Centre (Queens Market – S27), East Ham Major Centre (East Ham Market – S25 & East Ham Town Hall Campus – S26) and Canning Town District Centre (Silvertown Way West – S17 & Canning Town Central – S14) have Strategic Sites within their boundaries. These Strategic Site allocations (which are linked to the spatial policies, and reflect the main opportunities for non-incremental change) include detail of how existing retail space should be re-configured or expanded with reference to the type of retail that should be included (significant comparison for example).
Overall, the Plan as revised continues a strict ‘town centres first’ position, noting the considerable opportunity to consolidate and regenerate these centres by focussing investment within them, and planning new development as primarily as part of Strategic Sites including those that will warrant their own appropriately located centres (see e.g. S08). Beyond these town and local centres (existing and proposed) the objective is for consolidation, as highlighted in INF5:2I, and SP7:2b, with H1:2e, INF8:2b.vii and J2:2d identifying various transitional opportunities for micro-business and community uses at the edge of certain centres, and conversion to housing elsewhere as long as the retail is not a Protected Isolated Shop (PISh) as per INF5: 2i (explained at Paragraph 6.253d of the Implementation section).

It is important to note these policies have not been altered substantially since their original adoption within Newham’s Core Strategy in 2012. They were justified by the original Core Strategy evidence base (notably the Retail and Town Centre Study and Character Study) and updates to these (in 2016 and 2017) plus engagement on Local Plan Review and policy monitoring\(^5\) continue to justify their main elements, notably the clear stance on out of centre development, with only small amendments\(^6\). However, in order to make the linkages between these different policies and hence locational and qualitative guidance clearer, further minor amendments are proposed to Para 6.253b, together with editorial corrections to 6.249, and additions to the glossary to include the definitions of International, Metropolitan, Major, District and Local Centres.

\(^5\) Policy INF5 is used very frequently in the planning team’s decision making process. There does not seem to be any weak parts of this policy as evidenced by how often INF5 has withstood the scrutiny of Planning Inspectors during the planning appeal process. (Social Infrastructure Monitoring Bulletin, Forthcoming).

\(^6\) Further discussion of this can be found on pages 79 and 80 of the Social Infrastructure section of the Options Appraisal (SD06).
(ii) Should the Plan provide more detail on the quantum and location(s) of comparative and convenience retail provision for the plan period, e.g. for the Gallions Reach Shopping Park (set out in policy INF5.2.j)? Should the Plan set any quantitative parameters for the growth/consolidation of Stratford town centre? What is the definition of a major town centre?

The Town Centre and Retail Study and capacity projections are referenced within the text of Paragraph 6.253a of the Implementation section of Policy INF5, and the policy clearly directs reference to them in planning quantums and types of retail growth and attending to trade and spatial impacts. However, given the scale of population growth and rapidly changing retail behaviour, up to date calculations will be important particularly for Major retail/town centre development, as noted via a proposed post submission minor amendment, which highlights also the link to the strategic principle to reduce trade leakage and the potential to increase capacities by improved trade retention and population growth (e.g. through Strategic Site development at higher numbers than anticipated in 2016). This clause therefore provides for an appropriate check and balance in the policy accounting for uncertainty, alongside those in the wider policy framework – note for instance, that Policy J1 and SP3 speak to the importance of market testing to avoid voids. Nonetheless, INF5 does provide quantitative parameters in referencing different types of centre which are defined in scalar (and functional) terms and with associated growth expectations in the London Plan7 (supported by an up to date GLA evidence base) and reflected in INF5 policy by centre, which highlights Stratford and Canning Town has having most growth potential, as well as particular in centre Strategic Site allocations. A proposed further minor amendment seeks to clarify these definitions (International/Metropolitan/Major/District/Local) in the glossary of the Local Plan, and provide a locally benchmarked definition of a local centre (average 4650 sq m). The use of these scalar definitions, alongside the INF5 spatial strategy, justification and Strategic Site allocations which indicate the scale of opportunity within them/associated with them is clarified in a proposed minor amendment to the implementation para 6.253a. If a new centre, typically a local centre, is specified in a Strategic Site for instance, it would be expected to be of a local centre scale to meet local needs arising from the development and otherwise underprovided for locally, or else be required to undergo impact testing. By default, if a centre is not associated with Strategic Site development the scale of opportunity will be limited.

The definition of a Major Centre set out in the London Plan 2015 Annex 2 is that which is ‘typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sq. m of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.’ The upper limit is then defined

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by reference to the next centre up in the hierarchy, Metropolitan, which is ‘at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods’.

Gallions Reach presently comprises 30,940 sq m of town centre floorspace, so is quantitatively approximately 20,000 sq m below the ‘benchmark’ definition of a Major town centre as well as lacking the functional mix and other characteristics of a Major town centre or a town centre of any kind (e.g. being at a centre of a residential area, good public transport accessibility) although it has significant comparison floorspace and an associated broad catchment. However, the policy focus is not on the numbers per se, not least because of the caution advised in the Retail Study on this point, (EB4) although it is acknowledged that these provide relevant planning parameters hence the proposed submission minor amendment to the site allocation to insert the word ‘Major’. Instead, the focus is on the wider spatial and strategic objectives, (i.e. access, mix, integration) and it is these that are emphasised in the spatial policy S5, the retail hierarchy policy INF5 and the site allocation S01, requiring the new town centre to be focused around a new public transport hub for instance. This is explained in paragraph 6.249.

This is likewise the case in Stratford, where given the broad vitality of the ‘original’ town centre, whilst there is technically significant capacity for growth of particularly comparison floorspace, (taking it towards an International Centre in scale) qualitative change, such as updating floorspace and improving the overall accessibility and integration of the centre, is of greater relevance than a precise scale of town centre floorspace growth. Strategic Sites, spatial policy in S6, and INF5’s spatial strategy for East Ham, Green Street and Forest Gate town centres echo these points: that qualitative rather than significant quantitative change is required, and generally where quantitative increases are proposed these are expected to be supported by increased trade retention and population/spent uplift relating to the residential and employment floorspace provided for in those sites (see para 6.248, 6.248a). Indeed, this is reflective of a significant change in the retail market, with a much greater focus on other town centre uses and environmental quality rather than just retail by developers and a more conservative approach to floorspace development that emphasises increased efficiency.

Therefore, subject to the proposed further clarifications, it is not considered necessary or appropriate to provide more detail on floorspace quantums which would render the policy inflexible and provide a distraction from qualitative objectives, with policy criteria and the wider suite of policies providing the requisite checks and balances to determine appropriate quantitative change.
(iii) Does the Plan provide sufficient guidance to deliver a successful visitor and night time economy?

In recognising the opportunity presented by these growth sectors, the Plan provides policy of two types relating to the night time economy (NTE) and visitor economy one promoting it in principle, highlighting opportunities the borough presents, and one ensuring that it is carefully managed and nurtured to ensure its success and that of the wider town centres and neighbourhood manage it sits within. It is also recognised as having both an economic function (J1, J2) and a place-making role (e.g. SP5, SP6). This means policy relevant to applications concerning these uses is found in a variety of places across the Plan depending on the location and exact nature of the proposal.

However, the key policy is J1, which firstly sets out the principles of realising the opportunities presented by the borough’s strengths, (including identified Employment Hubs with particular sectoral strengths and good transport connectivity) diversifying the business base, and managing the needs of business, visitors, the economy, the environment and Newham’s communities (J1:1). These are all relevant to supporting visitor and NTE uses in principle, indicating that we welcome associated new investment, whilst highlighting the need to manage their impacts. The policy secondly sets out spatial strategies for visitor attractions and facilities (J1:2b) town centre including NTE uses (J1:2e) and small scale culture and creative uses (J1:2f) directing in which locations they would be most acceptable, particularly when of scale. It thirdly sets out technical criteria concerning neighbourliness/agent of change, (J1:3a/b), town centre impacts (J1:3c) and safety, quality and inclusivity of the NTE (J1:3d) to direct the management of impacts. Further guidance is also signposted in relevant Strategic Site allocations, (and through these, spatial policies development sites relate to) and policies SP8 (concerning neighbourliness) SP9 (concerning cumulative impact) and INF5 (concerning town centre hierarchy and network). Policies SP6 and INF8 will also be relevant in some cases depending on the use concerned and the location of the development, as will more general design policies concerned with creating successful places in the round (SP1-5 & SP7).

Subject to the proposed minor amendments concerning the operation of the ‘agent of change’ principle, clarifying the expectation that existing uses should be operating lawfully and reasonably, the Council is satisfied that these policies/individual policy criteria and the accompanying implementation guidance (and monitoring and review) when taken in the round, provide sufficient guidance to deliver a successful visitor and NTE when judged against the parameters of success set out in the strategic principles in J1:1. These have tackled the issues raised by engagement on these themes which identified that people want to see a better local evening offer whilst ensuring it is managed in a way that does not compromise the creation of high quality environments and successful places.
(iv) Should the Plan make provision for a specific quantum or range of retail floorspace in the town and local centres which would be deliverable within the plan period?

See the response to question 4.3ii above
(v) Does policy SP9.e effectively address the cumulative impact of hot food takeaways? Is there a need for more detailed criteria to make the policy effective and consistent in its application across Newham?

Note this answer concerns SP9 part 3b

In light of ongoing resident and Member concerns, and building on the ‘hook’ in existing policy SP3, provisions to manage the proliferation and cumulative impacts of hot food takeaway uses in Newham were introduced by the Detailed Sites and Policies DPD (adopted October 2016). Whilst the Local Plan review has merged two Successful Places policies previously titled SP9 ‘Recognising Cumulative Impact’ and SP10 ‘Managing Cumulative Impact’, the requirements of the policy have not changed.

Among the problems associated with the over-concentration of such uses were negative effects on the character of the areas concerned and the development of unhealthy lifestyles. NPPF paragraph 69 (Developing Healthy Communities) acknowledges the role planning plays in addressing factors that contribute to poor health. The policy was adopted in response to public concern about the spread of hot food takeaways as well as issues raised by public health bodies. The merged policy continues to address the overconcentration of takeaways which would be detrimental to a town centre’s feel and appearance, and potentially crowd out other uses or healthier food options. As the Options Appraisal explains (SD06), other than this amalgamation and some minor clarification, the policy has not changed since it was adopted in 2016 and is working effectively.

The Council’s position is that the policy’s criteria are sufficiently detailed and that it is precisely because of this detail that the policy is able to be applied effectively and consistently across the borough. Recent monitoring data shows that since the policy’s adoption there have been 16 applications for changes of use to takeaways (Class A5). Of these, three have been approved and thirteen refused. To date there have been no successful appeals against these refusals of permission. In the previous period (following adoption of the Core Strategy in 2012 but before adoption of the policy under consideration here) there had been six successful appeals against refusal of permission; a significant contrast.

The policy complements SP6 ‘Successful Town and Local Centres’ which seeks to maintain a robust and diverse retail core where hot food takeaways have a role to play in town centre vitality and viability and in principle are accepted as a town centre uses as per the NPPF. Policy SP9 operates in conjunction with Policy SP6, which focusses on town centre health and vitality; the Council notes that the policy has been used effectively since adoption in 2012 and has changed little in this review. Spatial policies and town centre visions also identify a common theme of the need to diversify town centre offers, particularly quality evening/leisure offers (as defined by SP9 3.a.11) and more broadly attend to local character, matters that are addressed by the cumulative impact policy.

As explained in paragraph 2.23b of the policy’s accompanying justification, the mechanism of using limits on linear and area concentrations was derived through a combination of engagement work and spatial analysis, recognising the impact of clustering of land use across small spatial extents and 400m being a
typical five-minute walk time. The criteria have the benefit of providing clarity for businesses and residents in the determination of whether a new takeaway would be acceptable or exceed the tipping point and exacerbate a surfeit in the area. The criteria define ‘how many is too many’ and enable the effective implementation of the policy’s aims.

SP9 part 3b is a technical policy concerned specifically with the location and clustering of takeaways; while it is recognised that hot food takeaways may raise environmental, public health and amenity concerns which sometimes result in contentious and controversial proposals, these matters (as per all other uses) are addressed by other policies. Noise or waste management issues for example are not unique to takeaways and, as per other applications, will be considered in light of policies including SP1 (Borough-wide place-making), SP2 (Healthy Neighbourhoods) and SP8 (Ensuring Neighbourly Development). In the context of policy regarding these generic issues being available in other parts of the Local Plan, it is considered that policy SP9 as written and further clarified through post submission minor amendments (see sample of policy changes appended at the end of this statement) is sufficiently detailed to address the impacts of A5 uses and apply the locational criteria effectively.

Overall, whilst it is considered that policy SP9 in its submitted form is effective and does not require additional criteria, the current technical criteria could be adjusted to usefully provide definition of what constitutes a ‘unit’ in terms of the policy, and to confirm that a primary shopping frontage is a frontage identified as such on the Policies Map.

Proposed changes to Policy SP9, 3 Design and Technical Criteria:

3. **Technical Criteria**

a. **In town centres, the need to maintain or contribute to the achievement of the following ensure that:**

i. **Within Primary Shopping Frontages (as shown on the Policies Map), 70% of units are in A1 use.**

Note: A unit comprises a single frontage premises in accordance with street naming and numbering.

ii. **Two-thirds of town centre leisure uses are to be ‘Quality leisure’ uses. Units in Class D2, A4 or A3 use should therefore account for at least 67% of leisure uses, and Class A5 uses, amusement arcades and betting shops should not account for more than 33%.

b. **In all areas, not resulting in exceeding any of the following definitions of area or linear the need to avoid over-concentrations of specific uses (currently betting shops, takeaways, and nightly-stay hostels) by ensuring that:**

**Linear concentrations:**
Linear concentrations:

i. **No** more than—two of the same specified uses are adjacent to each other; and

ii. or in a row without There is a separation distance of at least two units in other uses between them pairs (or groups if more than two units) in the same specified use (see attached map ‘Appropriate Linear Concentrations’) in a row; or

- a separation distance of two units in other uses between two units with the same specified use.

Area concentrations:

iii. a site having three or There are no more than three other premises in the same specified use within 400m of each other; and

iv. A 400m catchment drawn around a proposed specified use does not (i.e. the presence of three or more than three overlapping with any more than two other catchment areas drawn around existing or proposed units in the same specified use.)
SP4 Tall Buildings

Objective

6.35 Control the location and form of new tall buildings in the borough on a strategic basis to ensure they contribute to best effect in signifying regeneration and creating successful places.

Policy

In order for tall buildings to contribute to best effect in creating successful places and signifying regeneration and economic success in Newham, a strategic approach to their location and design is necessary.

Proposals comprising tall buildings (of 6 or more storeys) that address the following strategic principles and spatial strategy, and design, management and technical criteria will be supported:

1. **Strategic Principles**

   a. Tall buildings will, through their controlled managed the location, height, design, form and impact of new tall buildings in the borough on a strategic basis to ensure they contribute to best effect in promoting regeneration and creating successful places.

   b. Increased densities in the right locations will generally be encouraged, however, the appropriateness, added value and positive contribution of tall elements, particularly standalone tall towers will require robust justification and demonstration in relation to successful place-making and sustainable, mixed and balanced communities principles.

2. **Spatial Strategy**

   In order for tall buildings to contribute to best effect in creating successful places and signifying regeneration and economic success in Newham, a strategic approach to their location and design is necessary.

   To this end proposals comprising tall buildings (as defined at Paragraph 6.36) which address the following will be supported:

   a. Parts of Stratford Metropolitan town centre will be the key location for the tallest buildings in the borough (20 storeys plus on to mark key locations on landmark the Strategic sSites S05, but typically less) with the Canning Town ‘tallest buildings area’ Strategic Sites as a secondary focus, as a component of transformation plans for these centres (maps setting boundaries for Stratford ‘Tall Buildings Policy Area’ and Canning Town ‘Tall...
b. Other locations on Strategic Sites with good public transport access within both the Arc of Opportunity and Urban Newham may be regarded as suitable locations in principle for tall buildings with scale reflecting place hierarchy and where they will contribute to legibility, place-making, and sustainable communities objectives, ensuring sufficient space between clusters, as indicated in site allocations;

c. Elsewhere, new tall buildings will generally be inappropriate and opportunities to increase densities without tall buildings should be explored, with sensitively scaled tall buildings the possible exceptions rather than the norm and only in circumstances where there is good public transport access of at least a PTAL score of 4 and the opportunity to create generous public realm. An Indicative Heights Matrix for proposals outside strategic sites forms part of this policy, and where they will contribute to legibility, place-making and sustainable communities, and are sensitively scaled according to local and historic context.

3. Design, Management and Technical Criteria

a. Notwithstanding the above, in all cases the need for additional work, including the use of wire frames and 3D modelling to refine suitable locations and formations within this spatial framework with particular regard to the degree of public transport accessibility, local height context, heritage and other character assets and their settings and other sensitivities including cumulative impacts, in line with Policies SP1, SP3, SP5 and SP5-SP9, drawing on the Newham Character Study; and

b. In all cases the expectation that all tall buildings schemes will through masterplanning, detailed designs, modelling and expert and independent design scrutiny demonstrate appropriateness, added value and positive contributions relative to lower-rise alternatives, and meet exemplary design, execution and management standards (as per Policy SP3, SP5, and SP8) having regard to the initial screening and scoping reflected in Strategic Site allocation indicative height specifications and Indicative Height Matrix elsewhere, in respect of the paying particular attention to local context, the strengths and weaknesses of tall buildings, and the importance of integration with, and positive contribution to, their surroundings the following considerations:

i. Scale;

ii. Form and massing, including cluster formation/extension, and spacing and a balanced range of heights including mid-rise and low-rise elements where appropriate;
iii. Proportion and silhouette;
iv. Facing materials and detailed surface design;
v. Integration with local and historic context;
vi. Impact on streetscape including surrounding public realm and near views and Key Corridor objectives as per INF7;

vii. Impact on cityscape, distant views and skyline;

viii. Microclimate including daylight/sunlight, wind, and pollution dispersal impacts;
ix. Contribution to legibility, successful place-making and sustainable, mixed and balanced communities principles;
x. Management of communal spaces, inside and outside the building;
xi. Credibility of design from a technical and financial perspective including continuity of the project architect;
xii. Safety, including fire prevention and safe evacuation;

xiii. Impact on ecology and amenity of a watercourse.

For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy.
Map: Stratford 'Tall Buildings Policy Area'
Map: Canning Town ‘Tall Buildings Policy Area’
6.36 Tall buildings are defined in the London Plan as those that are noticeably taller than their immediate surroundings, and/or have a significant impact on the skyline. Tall buildings in Newham can therefore mean anything up to and beyond 25 storeys – buildings of this height are to be found in Stratford and Canning Town town centre. Elsewhere, in much of established Urban Newham, 5 storeys may be considered tall, though in most cases in the Arc of Opportunity 8-12 storeys would be the typical established height limit in newer development. To ensure the application of this policy to all tall building proposals in Newham, however, a tall building is considered to be six or more storeys and all proposals containing buildings of this height should be assessed against it. More detail on benchmark numbers of storeys is available in the Community Neighbourhood Forum analysis of the Character Study, with a typical storey height being 3.1 – 4m, although ground floor heights may desirably exceed this. Contextual analysis of this type will be an important part of any Design and Access Statement. This policy will therefore apply across the borough where schemes exceed this typical height limit, and is a clear statement that just because one or two buildings in the vicinity of a site are taller than the prevailing building height locally, this does not mean that further tall buildings will be acceptable. The table below helps clarify the application of the policy.

6.37 Tall buildings offer the opportunity to build to higher densities around public transport nodes/key routes and Town Centres, helping to support their viability and the viability of wider regeneration schemes, responding to small redevelopment sites with high land values. Tall buildings can also be iconic buildings that define a strong sense of regeneration, economic vitality and status of place, creating new views and landmarks to navigate by. Importantly however, many of these benefits can be achieved in buildings that are ‘taller’ (by a few storeys) than the prevailing height locally, but not necessarily ‘tall’ in the increasingly common sense of the word – 18-20 storeys plus. Moreover, tall buildings in the wrong context or that are poorly designed can also negatively impact on the character of a local area. In such situations, they can not only appear out of context, but can also impact on neighbouring properties through overshadowing and over-dominance, and the creation of inhospitable places at ground level due to downdraughts. There are also concerns that tall buildings have not in the past adequately provided for the needs of families, or more generally, adequately compensated for the residential densities they create with additional private and public amenity space.

6.37a There are many positive aspects to tall buildings which make them an attractive development from several perspectives. Tall buildings can help create and distinguish high quality place-making which is one of the overarching objectives of the Local Plan: they can be excellent works of architecture, and some of the best post-war examples are now statutorily
listed. The introduction of a prominent visual feature into an existing townscape can change its character and appearance and present a better perceived ‘offer’ for the area to the rest of the borough and London: Tall buildings can thus be iconic buildings that define a strong sense of regeneration, economic vitality and status of place, creating new views and landmarks and helping to improve legibility by marking for instance, town centres and transport hubs.

6.37b Tall buildings also offer the opportunity to build to higher densities around public transport nodes/key routes and in town centres, helping to support their viability and vitality. They may accommodate significant numbers of new homes, and cross subsidise affordable housing, and employment-generating uses/community facilities in an intensely used and vibrant development that activates the surrounding area and makes new infrastructure viable. A tall building can offer flexibility between office, hotel and residential and other appropriate uses. They can also help secure the redevelopment of small sites with high land values, or sites which need to ‘give’ land to open space, view or route corridors or buffer industrial uses, roads and rail infrastructure. This form of development therefore can help promote mixed use areas and mixed communities and aids growth, optimising development potential in light of local and strategic needs.

6.37c Conversely, a poorly designed tall building may create an isolated mono-community with little social interaction within the building and with the wider community in the area. The economics of building a taller building with its higher service charges may not necessarily optimise the housing opportunities available to residents in the borough. There may also be problems of ‘ownership’ and intensity of use of communal areas if not designed in such as way as to secure communal responsibility and ensure durability.

6.37d A principal failing with tall buildings can be a lack of understanding of the nature of the area around them, and failure to demonstrate neighbourliness (see SP8). Issues of local wind flow disruption, temperature reductions at pedestrian level around tall buildings, over-shadowing and street pollution flushing effects will have implications for the amenity of those living or working in or around the buildings. Perhaps most importantly, a tall building if not in the right place and if not well designed including treatment of the surrounding public realm, will by virtue of its size and widespread visibility, seriously harm the qualities that people value about a place, disrupting rather than enhancing place character.

6.37e Further work should also Importantly however, many of these benefits can be achieved in buildings that are ‘taller’ by just a few storeys than the prevailing height locally, but not necessarily ‘tall’ in the increasingly common sense of the word – 18-20 storeys plus. -In addition, mid-rise development has less impact on surrounding dwellings, less overshadowing, and offers more
opportunities for social interaction. As such, it is worthwhile to consider alternative ways of providing high density development, given that 2 to 4 storey combinations of mews housing and flats and maisonettes can yield densities of up to 120 dwellings per hectare. This is particularly relevant in relation to the qualitative criteria specified, notably sustainable community objectives described in more detail in the Homes Section, where housing mix and choice including a greater proportion of family housing, and overall high quality housing with appropriate amenity space, are prominent themes. This is significant because research has shown that tall buildings with high child densities, but also conversely, where social housing forms a significant proportion of units, are more intensively used, and hence unless very carefully designed and managed, potentially less successful. Another consideration is that service charges in tall buildings, when not capitalised, can reduce affordability, particularly for shared ownership units. The emphasis in the local plan on mid-rise development as the preferred form for tall buildings in the borough is based on these considerations, requiring specific demonstration of their added value.

6.37f The design and management specifications for tall buildings are high, reflecting the particular effort needed to overcome the disadvantages of tall buildings and their potential negative impacts locally, to ensure their strengths are more prominent. Moreover, good practice has established that family housing is best focused on the first four storeys of a block, enabling easiest access to the block and open space. This specification extends to the procurement process – designs must be credible, technically and financially, as design excellence is easily disrupted by the standard of execution. Amenity, communal and circulation space, the ground level environment created, the design of the top of the building, public access and site permeability, sustainability, and the relationship with transport infrastructure will need particularly careful treatment. Likewise, it is essential to ensure that evacuation times are as speedy as possible, to improve fire resistance, and to ensure that future changes and alterations do not have an adverse affect on safety.

6.38 The current situation in Newham is that tall buildings in recent years have been constructed without strategic direction, tending to accentuate their negatives and undermine the coherence of places, despite some positive aspects. The increasing pressures of recent years for tall buildings have been guided to appropriate locations by Policy SP4. Although there have been some cases where buildings have been constructed at greater heights than would have been indicated by the policy, these approvals were justified by criteria also referred to by the policy: tall buildings already present in the locality setting a local character which accommodated the height of the proposal; proximity to public transport nodes; and design excellence as certified by the Design Review Panel.
6.38a This policy therefore continues to advance a more strategic, plan-led approach to the placing of tall buildings in the urban context, as required by national and London-wide policy. Spatially, this is based on an analysis of sensitivity and capacity, including the overall spatial vision for the borough, and an understanding of the strengths and weaknesses of tall buildings including those already in place. To this end, subject to locational and formational refinement work concerning sensitivities as specified below, Stratford Metropolitan and Canning Town town centres are highlighted as priority locations, given the transformations of borough-wide significance to take that are taking place in these centres, and the resultant importance of them, as well as their associated transport hubs.

6.38b The Local Plan emphasises the management of the borough’s six town centres and their hinterlands as part of a clearly defined place hierarchy within the borough, encouraging consolidation of town centre uses, and by extension, other intensive uses of space, within their boundaries. The town centres are characterised by high PTAL ratings and ready availability of services making them appropriate locations for high density development. Tall buildings have the potential to deliver quality place-making with associated socio-economic benefits by providing buildings of high architectural quality as well as improvements to the public realm. The spatial benefits of guiding tall buildings to town centres include enhancement of the centre’s vitality and viability and the potential introduction of a prominent feature which will promote its identity and have also the potential to enhance its identity. In the best cases, an appropriately sited tall building of superior design can provide a marker for a town centre which enhances its identity.

6.38c In line with this policy approach to a hierarchy of places in the borough as such, these two centres Stratford Metropolitan and Canning Town town centre are therefore distinguished by their being the only acceptable areas in the borough where for new tall buildings over 20 storeys should be focused, supported by additional tall buildings of lesser height. The particular formations of these centres should be clearly related to the place-making transformation plans for these centres articulated in spatial policies and site allocations more detailed work, and subject to the further policy tests of bullet point 6 discussed below set out in this policy, and the wider design policies of SP1, SP3, SP5, SP7 and SP8. The remaining town centres may also be appropriate for tall buildings as identified by the Strategic Sites allocations but these will be of a lower height than those in Stratford and Canning Town.

6.39 In the remainder of the Arc, particularly south of Canning Town town centre there is capacity for tall buildings due to the large development sites which can absorb carefully planned innovative schemes, though the Airport’s safeguarding Area compulsorily restrains affects development heights over much of the area. However, tall buildings these need to be deployed more
strategically, in relation to locations that are immediately accessible by high volume public transport links (DLR, Crossrail, tube) and to help mark the centres or other foci of new places, which will typically be around such stations. 6.39a It is also important that significant views within the borough are protected. Although the lie of the land in Newham is flat and very gently rises from the river there are nevertheless views through to the rivers Thames, Lea and Roding and parks from public open space including Key Corridors which are worthy of protection. The importance of maintenance of a coherent and legible skyline through position, height, form and materiality across the borough is therefore an important consideration in the appropriate location of tall buildings. In the strategic sites allocations, views of particular importance are identified.

6.39b Each of these Strategic Sites is therefore accorded an indicative height and other formational specifications. In arriving at these indications, other existing tall buildings and concurrent proposals for tall buildings at adjoining and nearby sites with particular reference to impacts arising from creation of a cluster of tall buildings or an addition to an existing cluster have been taken into consideration. A similar approach is taken to the Strategic Sites in Urban Newham where there will be more limited opportunity for tall buildings given the more tightly woven, lower rise existing urban grain and heritage assets, which will need to be reflected in their scale. As in the Arc of Opportunity, strategic sites appropriate for tall buildings are allocated in Urban Newham with an indication of an acceptable height for each site. This has already occurred in the area as part of the master-planning and almost complete development of the ExCeL estate, with its high density form establishing a new development context that marks its status as an important employment hub, (see Policy J1) and block heights generally increasing around stations; this policy allows for its completion as a planned tall buildings cluster in a carefully managed way.

6.39c Elsewhere, the Strategic Sites within the Arc are starting points for the planning for such places, affording This approach delivers a scale of individual sites and clusters of sites which allow for appropriate master planning and the specific siting and formation of tall buildings and/or other forms of higher density development to best effect. Ensuring that scale is appropriate as part of place-making means sensitivity to local and historic context and character as per Policies SP1, SP3, and SP5, but also the degree of public transport accessibility, place hierarchy (distinguishing between town and local centres and their hinterlands, and reflecting the town centre hierarchy set out in INF5), and enclosure and integration objectives for Key Corridors and linear gateways. This also means attending to townscape and heritage aspects of character as part of place-making, as per Policies SP1, SP3, and SP5 and ensuring that these clusters and locations remain distinct, rather than joined by long lines of tall buildings. In this regard, an emphasis on stepping down and transition in scale are important to establish satisfactory relations with surrounding development, and in some cases stepping back (above a certain
height may help in more low rise areas/smaller sites) will also be important. The Airport’s Safeguarding Area will however also affect development heights in the southern part of the area (see Policies SP2 and INF1).

6.40 Elsewhere in Urban Newham, there will be more limited opportunity for tall buildings given the more tightly woven, lower rise existing urban grain and heritage assets, which will need to be reflected in their scale. Outside the strategic sites referred to above, only in exceptional cases may it be unusual for tall buildings be supported particularly in Urban Newham, and even then this is likely to be principally in the form of marginal increases in heights (by 1-2 storeys, possibly up to about 8 storeys). The integration of the tall building with the local and historic context will be fundamental considerations. Public transport accessibility, (including key bus routes) legibility and their contribution to improvement schemes as part of wider place-making particularly with regard to public realm enhancements (e.g. improvements to development coherence, or town centre improvements – see Policies SP1, 3, 6 and 7) will, however, also be important locational considerations. Elsewhere in the borough outside the Strategic Sites there will be limited opportunities for the development of tall buildings. A minimum PTAL level 4 is expected at tall building developments outside the allocated Strategic Sites, and scope to create generous public realm. This again will usually imply location adjacent to key transport nodes, (bus stations, train and underground stations) and sites size and location that affords significant public realm opportunities and schemes on associated Strategic Sites, and not extended linear formations. Along key corridors however, (see Policy SP7) marginal increases in height (by 1 or 2 storeys) may nonetheless be acceptable to help improve enclosure and integration of existing buildings and public realm, with scope for possible mid-rise developments in town centres and adjacent key transport nodes. This is reflected in the Indicative Heights Matrix below.

6.41 Additional, more detailed work concerning location and formation within this spatial framework will be necessary to ensure such buildings contribute positively as envisaged. The policy establishes new strategic parameters as the basis for such refinement work in different parts of the borough, drawing extensively on Historic England’s Tall Buildings guidance.

6.42 Further work should also consider alternative ways of providing high density development, given that 2 to 4 storey combinations of mews housing and flats and maisonettes can yield densities of up to 120 dwellings per hectare. This is particularly relevant in relation to the qualitative criteria specified, notably sustainable community objectives described in more detail in the Homes Section, where housing mix and choice including a greater proportion of family housing, and overall high quality housing with appropriate amenity space, are prominent themes. This is significant because research has shown that tall buildings with high child densities, but also conversely, where social
housing forms a significant proportion of units, are more intensively used, and hence less successful. Another consideration is that service charges in tall buildings, when not capitalised, can reduce affordability, particularly for shared ownership units. Moreover, good practice has established that family housing is best focused on the first four storeys of a block, enabling easiest access to the block and open space. All these factors are relevant in determining the acceptability of a tall building in principle in relation to target occupiers, and in relation to acceptable arrangements of units.

If tall buildings are nonetheless justified in their accommodation of sustainable community objectives, the design and management specifications are high, reflecting the particular effort needed to overcome the disadvantages of tall buildings and their potential negative impacts locally, to ensure their strengths are more prominent. This specification extends to the procurement process – designs must be credible, technically and financially, as design excellence is easily disrupted by the standard of execution. Amenity, communal and circulation space, the ground level environment created, the design of the top of the building, public access and site permeability, sustainability, and the relationship with transport infrastructure will need particularly careful treatment.
Insert Matrix table
Implementation

6.44 Further detailed work required concerning location and formation within this spatial framework will be local planning authority initiated masterplanning and Conservation Area Appraisals (including Management Plans), or in the absence of this, a tall buildings study relevant to the scheme in question, which developers will be expected to respond to in their Design and Access Statements. Such studies, which to date include a study (as referenced) completed for the Stratford Metropolitan Masterplan (which has been adopted as a strategic statement for the regeneration of the Stratford area and is therefore a material consideration in planning decisions for development control purposes) will be translated into subsequent DPDs and SPDs as appropriate.

6.44a A typical storey height being is being 3.1 – 4m although ground floor heights may desirably exceed this at 4.65 metres. A tall building in the context of Newham is therefore an excess of 17.05 metres. This policy will therefore apply across the borough where schemes exceed the typical height limit 5 storeys or less if they nonetheless exceed this height. and is a clear statement that

6.44b This approach emphasises that just because one or two buildings in the vicinity of a site are taller than the prevailing building height locally, this does not mean that further tall buildings will be acceptable. In particular, the local authority tower blocks that were erected as part of a national housing program in the 1960s and 70s without reference to spatial planning or local character and which dominate some parts of the borough should be discounted as precedents.

6.44c The indicative heights as part of Strategic Site allocations [and—indicative Heights Matrix for sites elsewhere] help clarify the application and expectations of the policy, presenting an initial screening and scoping. More detail on height contexts benchmark numbers of storeys is available in the Community Neighbourhood Forum analysis of the Character Study. Further detailed work required concerning location and formation within this spatial framework will be local planning authority initiated masterplanning and Conservation Area Appraisals (including Management Plans), or in the absence of this, a tall buildings study relevant to the scheme in question, which developers will be expected to respond to in their Design and Access Statements. Such studies, which to date include a study (as referenced) completed for the Stratford Metropolitan Masterplan (which has been adopted as a strategic statement for the regeneration of the Stratford area and is therefore a material consideration in planning decisions for
development control purposes) will be translated into subsequent DPDs and SPDs as appropriate.

6.44d At the planning application level which it is expected will have been preceded by an extensive pre-application process including supervision by the Design Review Panel, proposals will be expected to fulfil the following requirements as a minimum, typically requiring detailed designs, accurate and realistic representations of the proposal including 3D modelling of the scheme and its surroundings, and for all tall buildings:

1. Alternative ways of providing high density development (including various height mixes) in this location and the specific added value that the tall building(s) bring to the scheme in comparison.

2. Justification of any deviation from site allocation height indications, given that these have been based on an initial screening of constraints and acceptability in the area, with specific reference to:
   i. the character of surrounding areas and the settings of heritage assets
   ii. impact on significant views
   iii. impact on townscape and public realm including open spaces and blue ribbon infrastructure
   iv. cumulative impacts of tall buildings

3. Consideration of impact on microclimate and local environment

4. Consideration of distribution of unit sizes, and tenures, particularly 3 bed units, and management, including fire safety and evacuation measures and affordability of service charges

6.45 Further guidance may be appropriate to fill in identified gaps in existing guidance (and updates as appropriate) and specialist advice available from the Council, Historic England English Heritage and Design Council CABE will assist in the consideration of tall building proposals. CABE’s Building for Life 12 criteria and/or positive reviews from the independent Design Review Panel may be used to evaluate design excellence. Historic England note no. 4 ‘Tall Buildings’ will be a material consideration.

6.45a Airport considerations Development proposals above specified heights within set distances of the airport and all development immediately adjacent to it will require referral to the Civil Aviation Authority for scrutiny of flight path, visibility and safety implications. These compulsory aerodrome safeguarding measures will of themselves restrain building height over a substantial area.

6.45b Where reference is made to successful-place making and sustainable communities objectives, further detail are set out in other SP policies, H1-3
and spatial policies. Place-hierarchy, distinguishing between town and local centres and their hinterlands is further elaborated in SP6 and INF5.

6.46 Site assembly - given that tall buildings are best planned and designed on larger sites which gives maximum flexibility to their formation, and alternative forms of high density development can also be more easily achieved on larger sites, site assembly may be helpful is central to securing the qualitative aims of this policy, which public bodies can facilitate.

6.46a Careful master-planning of a Strategic Site will enable the location of the tallest buildings in any scheme to be placed at key locations. Such key locations may be identified at transport nodes and/or local/town centres effecting a place hierarchy within the site itself. Alternatively, they may relate to the topography and characteristics of the site, and visual design approach e.g. at focal points for vistas. Justification for a tall building at a particular location within a Strategic Site will be required to meet the design, management and technical criterial set out this policy with reference to the interior of the Strategic Site as well as the wider area, and the meaning of the term ‘key’ should not be stretched so as to dilute it by applying it to too many locations.

6.46b This has already occurred in the area as part of the master-planning and almost complete development of the ExCeL estate, with its high density form establishing a new development context that marks its status as an important employment hub, (see Policy J1) and block heights generally increasing around stations; this policy allows for its completion as a planned tall buildings cluster in a carefully managed way.

6.47 Redevelopment of older tower blocks, or where close to Strategic Sites, their appropriate integration into tall building compositions, should be proactively considered as part of housing improvement schemes where practicable, to secure more appropriate housing formations, and improve local character.

Monitoring

6.47a The monitoring framework includes specific performance indicators relating to Tall Buildings upon which the relevance and efficacy of Policy SP4 will be assessed, through in-house activity monitoring and GIS analysis. Tall building approvals will be monitored on an annual basis in the Planning Register. Outcome measures will reflect broader successful place-making and good growth. Engagement with residents and elected members will also be an important feedback mechanism.

6.47b Indicators

i. SP-OP4 Strategic direction of tall buildings:
a. Location of tall building approvals [no specific target, monitor for conformity with spatial strategy];

b. Tall buildings approved without detailed designs [no specific target, should be decreasing];

ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];

iii. SP-OUT1 Successful Place-making and Design:
   a. Satisfaction with the area [Maintain above 75%, should be improving]
**Table SP.A** Indicative appropriateness of tall buildings across different parts of the borough outside Strategic Sites (for Strategic Sites, see Site Allocations in Appendix 1)

<table>
<thead>
<tr>
<th>Area</th>
<th>20 plus storeys</th>
<th>8-12 storeys (only in exceptional cases 13-19 storeys)</th>
<th>5-8 storeys (mid rise development)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stratford Metropolitan town centre</td>
<td>Appropriate on parts – as per the Stratford–Central Strategic Site site allocation and as demonstrated by technical criteria.</td>
<td>Appropriate on parts – refined as per Stratford Metropolitan Masterplan tall buildings study, and subject to policy tests.</td>
<td>Appropriate on parts refined as per Stratford Metropolitan Masterplan Tall Buildings Study, and subject to policy tests.</td>
</tr>
<tr>
<td>Canning Town tallest building area</td>
<td>Appropriate on parts to be refined via revised SPD, and Appropriate on parts as per Strategic Site allocations or as demonstrated by technical criteria</td>
<td>Appropriate on parts to be refined via revised SPD, and subject to policy tests.</td>
<td>Appropriate on parts to be refined via revised SPD, and subject to policy tests.</td>
</tr>
<tr>
<td>Other Arc Strategic Sites</td>
<td>Inappropriate unlikely that exception and other tests will be passed; should be uncommon compared to numbers in Stratford Metropolitan and Canning Town as per bullet point 1 of the policy.</td>
<td>Appropriate on parts, as per Strategic Site Allocation where adjacent to high volume transport nodes, subject to policy tests including refinement work and master-planning</td>
<td>Appropriate on parts adjacent to high-volume transport nodes, and subject to policy tests including the need for refinement work and master-planning</td>
</tr>
<tr>
<td>Urban Newham Strategic Sites</td>
<td>Inappropriate</td>
<td>Inappropriate unlikely that exception and other tests will be passed</td>
<td>Inappropriate possible exception for sensitively scaled and designed schemes where adjacent to high volume public transport nodes subject to policy tests including the need for further refinement work and master-planning</td>
</tr>
<tr>
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<td>----------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Arc of Opportunity outside Strategic Sites, Stratford Metropolitan and Canning Town Tall Buildings Areas</td>
<td>Inappropriate</td>
<td>Inappropriate unlikely that exception and other tests will be passed</td>
<td>Inappropriate – exception and other tests will be very difficult to pass; along Key Corridors only, a marginal (1-2 storey) increase in height related to policy objectives of SP7 (enclosure, integration) may be acceptable</td>
</tr>
<tr>
<td>Urban Newham outside Strategic Sites</td>
<td>Inappropriate</td>
<td>Inappropriate unlikely that exception and other tests will be passed</td>
<td>Inappropriate – exception and other tests will be very difficult to pass; along Key Corridors only, a marginal (1-2 storey) increase in height related to policy objectives of SP7 (enclosure, integration) may be acceptable</td>
</tr>
</tbody>
</table>
the borough’s Key Corridors close to transport nodes where the objectives of Policy SP7 for high quality urban design (including enclosure, integration) and public realm improvements can be achieved.
SP8 Ensuring Neighbourly Development

Objective

2.6 To ensure the environmental, social, and design impacts of all development are neighbourly.

Policy

Proposals that address the following Strategic Principles, Spatial Strategy and Design, Management and Technical criteria will be supported:

1. Strategic principles and Spatial Strategy

a. All development is expected to achieve good neighbourliness and fairness from the outset by avoiding negative and maximising positive social, environmental and design impacts for neighbours on and off the site; The principles of neighbourliness apply throughout the lifecycle of the development.

b. The achievement of neighbourliness will ensure that the benefits of development and regeneration will be spread beyond the context of individual development proposals, in accordance with convergence aims.

c. Change brought about by development must not cause problems for existing lawful neighbours, otherwise known as an ‘agent of change’ approach; and

d. The Council encourages innovative approaches to achieving neighbourliness.

This policy applies to all development. The Council encourages innovative solutions to achieving neighbourliness and will support proposals that demonstrate:

2. Design, Management and Technical Criteria

a. Compliance with the standards and due regard to the importance of the technical guidance in Table SP.E where they are relevant to development proposals, will be expected to promote neighbourliness in addressing the need to:

i. ensure integration with the street scene including consideration for advertisements and signage; boundary treatments; parking provision; external storage; plant housing and the quality of materials;

ii. create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime in accordance with policies SP1, SP2 and SP3;

iii. ensure that buildings and other spaces likely to involve the congregation of people are well managed and address the street and neighbourhood in terms of
character and orientation, legibility, inclusivity and an obvious and welcoming access;

iv. protect and enhance accessibility, local connectivity and permeability;

v. prevent the loss of, and where possible enhance on and off site green infrastructure, including public open space, private amenity space, trees and woodland in accordance with policies SC1, SC4, and SC5, SP2 and INF6 & 7;

vi. avoid creating or exacerbating off-site flood risk in accordance with policies SP9, SC3 and SC5;

vii. protect the locality from adverse microclimate effects (such as wind tunnelling) in accordance with policies SP4 and SP7; and

viii. minimise impacts of development’s interference with broadcasting and other telecommunications services.

ix. encourage the use of sustainable transport and minimise parking stress in the neighbourhood including the provision of publicly accessible car club spaces and electric car charging points in accordance with policy INF2;

x. achieve a high standard of access, egress and circulation for all, including through the provision for waste, recycling and bicycle storage facilities; the siting of parking provision and design legibility;

xi. avoid unacceptable exposure to light (including light spillage), odour, dust, noise, vibration, radiation and other amenity or health impacting pollutants in accordance with policy SP2;

xii. ensure adequate access to daylight and sunlight in accordance with policy SP3;

xiii. minimise overlooking and loss of privacy, overshadowing, and overbearing impact;

xiv. make appropriate provision for communal spaces and private amenity spaces (e.g. bedrooms and places of retreat) in multiple-user buildings (including HMOs) and should takinge into account any losses incurred;

achieve a high standard of access, egress and circulation for all, including through the provision for waste, recycling and bicycle storage facilities; the siting of parking provision and design legibility.
Appropriate provision for communal spaces and private amenity spaces (e.g., bedrooms and places of retreat) in multiple-user buildings (including HMOs) and should take into account any losses incurred.

Integration with the street scene including consideration for advertisements and signage; boundary treatments; parking provision; external storage; plant housing and the quality of materials.

Buildings and other spaces likely to involve the congregation of people are well managed and address the street and neighbourhood in terms of character and orientation, legibility, inclusivity and a welcoming access.

Consideration and incorporation of the following standards and guidance as set out in Table 1 (or any subsequent updates or replacements) where possible.

Table SP.E Environmental standards and guidance

<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard or Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telecommunications</td>
<td>International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines¹</td>
</tr>
<tr>
<td>Radioactive sources and x-ray generators</td>
<td>National Radiological Protection Board (NRPB) guidelines²</td>
</tr>
<tr>
<td>Light Spillage</td>
<td>GLA: Sustainable design and construction SPG (2014)³</td>
</tr>
<tr>
<td></td>
<td>Department for Environment, Food and Rural Affairs (DEFRA) guidance on sections 101 to 103 of the Clean Neighbourhoods and Environment Act 2005, titled ‘Statutory nuisance from insects and artificial light’⁴</td>
</tr>
<tr>
<td></td>
<td>Institute of Lighting Professionals: Guidance notes for the reduction of obtrusive light⁵</td>
</tr>
<tr>
<td>Odour and Fumes</td>
<td>Defra Department for Environment, Food and Rural Affairs (DEFRA) guidance manuals for regulation of businesses that produce pollution⁶</td>
</tr>
<tr>
<td></td>
<td>Environment Agency (EA): H4 Odour Management.⁷</td>
</tr>
<tr>
<td>Dust</td>
<td>GLA: Control of dust and emissions during construction SPG (2014)⁸</td>
</tr>
</tbody>
</table>

¹ https://www.icnirp.org/
³ https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf
⁵ https://www.theilp.org.uk/resources/free-resources/
⁶ ???
⁷ https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management
⁸ https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and
<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard or Guidance</th>
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</table>
Education Funding Agency: BB93 Acoustic design of schools: performance standards[^10]  
British Standards:  
For plant noise on residential and commercial/industrial premises:  
BS 4142:2014 Methods for rating and assessing industrial and commercial sound.[^13]  
For controlling internal and external noise within a development:  
BS 8233:2014 Guidance on sound insulation and noise reduction for buildings.[^14] |
| Vibration | British Standard:  
BS 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting.[^16] |

[^12]: [https://shop.bsigroup.com/ProductDetail?pid=000000000030258086](https://shop.bsigroup.com/ProductDetail?pid=000000000030258086)  
[^14]: [https://shop.bsigroup.com/ProductDetail?pid=000000000030268408](https://shop.bsigroup.com/ProductDetail?pid=000000000030268408)  
[^15]: [https://shop.bsigroup.com/ProductDetail?pid=000000000030241579](https://shop.bsigroup.com/ProductDetail?pid=000000000030241579)  
[^16]: [https://shop.bsigroup.com/ProductDetail?pid=000000000000315191](https://shop.bsigroup.com/ProductDetail?pid=000000000000315191)  
[^16]: [https://shop.bsigroup.com/ProductDetail?pid=000000000019971044](https://shop.bsigroup.com/ProductDetail?pid=000000000019971044)
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<tr>
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<th>Standard or Guidance</th>
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</table>
| **Ground/Soil Pollutants - contaminated land** | **Defra/ LBN** London Borough of Newham: Contaminated Land Strategy 2003 [27]  
Land Quality Management’s Generic Assessment Criteria (2009)  
LQM/CIEH: Suitable 4 Use Levels [18]  
**DEFRA** Environmental Protection Act 1990: Part Iia Contaminated Land Statutory Guidance, 2012 [19]  
**DEFRA and EA** The Model Procedures for the Management of Land Contamination, 2004 (CLR11) [20]  
| **Air Quality** | **Air Quality (England) Standards Regulations 2010 [22]**  
**GLA** Mayor of London’s Air Quality Environment Strategy 2018 (2010) [23]  
**GLA** Control of dust and emissions during construction SPG (2014) [24]  
**DEFRA and Department for Transport (DFT)** National Air Quality Plan for Nitrogen Dioxide (NO2) in UK [26] |

[23] https://www.london.gov.uk/what-we-do/environment/london-environment-strategy  
[25] https://www.newham.gov.uk/Pages/Services/air-quality.aspx  
<table>
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<tr>
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<tr>
<td></td>
<td>Secured by Design design guides[^28^]</td>
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<tr>
<td></td>
<td>TfL: London Cycle Design Standards (LCDS) ^29^</td>
</tr>
<tr>
<td></td>
<td>Safer Places and Secured By Design / BFL-12</td>
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<tr>
<td>Car Parking &amp; Charging Points and cycle parking</td>
<td>London Plan and HSPG (2012)/ BFL12</td>
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<tr>
<td></td>
<td>GLA: London Plan policy 6.13 Parking policy (currently Policy 6.13) ^30^</td>
</tr>
<tr>
<td></td>
<td>Design Council: Building for Life 12:10 (Car parking) ^27^</td>
</tr>
<tr>
<td></td>
<td>GLA: Accessible London SPG ^31^</td>
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<tr>
<td></td>
<td>TfL: Accessible London SPG</td>
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<tr>
<td></td>
<td>Tfl: London Cycle Design Standards (LCDS) ^29^</td>
</tr>
<tr>
<td>Daylight/Sunlight</td>
<td>BRE Guidelines</td>
</tr>
<tr>
<td></td>
<td>Building Research Establishment (BRE): Site layout planning for daylight and sunlight: a guide to good practice (BR209) ^32^</td>
</tr>
<tr>
<td>Overall Neighbourhood Design and Management including permeability, accessibility and local connectivity</td>
<td>Design Council: Building For Life (BFL) 12[^4^]</td>
</tr>
<tr>
<td></td>
<td>London Borough of Newham: Character Study 2016[^33^]</td>
</tr>
<tr>
<td>Refuse, post deliveries, storage (including recycling) and utility</td>
<td>(LBN) Waste Management Guidelines / Mayors HSPG / BFL-12</td>
</tr>
<tr>
<td></td>
<td>GLA: Housing SPG 2016[^34^]</td>
</tr>
<tr>
<td>Refuse/External Storage (including recycling)</td>
<td>Design Council: Building For Life (BFL) 12:12 (External storage and amenity space) — Question 12[^27^]</td>
</tr>
<tr>
<td></td>
<td>Waste Management Guidelines (LBN) / BFL 12: Principle 12</td>
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<tr>
<td></td>
<td>GLA: Housing SPG 2016</td>
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</table>

[^30^]: https://www.london.gov.uk/what-we-do/planning/london-plan
[^31^]: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/creating-london
[^32^]: https://www.brebookshop.com/details.jsp?id=326792
[^33^]: https://www.newham.gov.uk/Pages/Services/planning-policy.aspx
[^34^]: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary
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<tr>
<td><strong>Car-Parking</strong></td>
<td><strong>Building For Life (BFL) 12</strong></td>
</tr>
</tbody>
</table>
| **Housing Design (private amenity space/space standards)** | **Mayor’s Housing SPG (2016)**  
**GLA: Housing SPG 2016**  
**Design Council: Building For Life (BFL) 12**  
**GLA: Mayor’s Play and Informal Recreation SPG (2012)** |
| **External storage and amenity space—waste, recycling and bike storage** | **GLA: Housing SPG 2016**  
**London Borough of Newham: Waste Management Guidelines for Architects and Property Developers**  
**BFL 12: 12 (External storage and amenity space)** |
| **Trees and Woodland**                    | **BS 5837:2012 Trees in relation to design, demolition and construction**             |

Standards or guidance shall be deemed to relate to the most up to date version in place to the same intention and effect, accounting for the fact that current standards and guidance may be amended, restated and/or replaced from time to time.

Policy Links

S1, SP1, SP2, SP3, SP4, SP7, H1, INF2, SC1, SC3, SC5

For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

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References:

https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary


https://shop.bsigroup.com/ProductDetail?pid=0000000000030213642
2.7 High quality development by definition should not result in adverse impacts on the amenity enjoyed by nearby properties. The Local Plan Core Strategy seeks the creation of successful, healthy and safe places while protecting existing environments. This policy sets out detail around the securing of improvements to character and the successful integration of the differing land uses necessary to meet the range of needs in the Borough (both residential and commercial). Local Plan Core Strategy design, housing quality and transport policies provide a basis for the scrutiny of neighbour impacts, however there is scope to provide specification around the aspects that cause most concern as well as emphasise the potential for a more rounded, positive approach to neighbourliness that is aligned with the Council’s Central Agenda and the high level strategic objectives of the Local Plan Core Strategy.

2.7a The Local Plan seeks the creation of successful, healthier and safer places, and in doing so, the securing of improvements to character and the successful integration of different land uses that are necessary to meet the range of needs (including residential, commercial, industrial and infrastructural) optimising development in a way that is both neighbourly and fair. Policies SP1-7 seek to create successful places, healthy neighbourhoods and quality design. The vision in turn, seeks transformation of these characteristics to make it much more likely that people will choose to live, work and stay in the area and achieve improvements to health and deprivation so Newham is more like the rest of London.

2.7b Much of the Borough compromises already dense development where the scope for transformational change rests on the cumulative impact of smaller scale changes (Urban Newham). In these areas, many of the existing problems that people are concerned with, and those that they expect to be worsened by new development, are ‘neighbour related’ and linked to very specific aspects of design. Moreover, a key component of the overall spatial strategy promoted by the Plan is to promote higher densities and new forms of mixed use development in the Arc of Opportunity and Town Centres, where the impact of neighbours becomes more significant.

2.7c Further to this, design/place-quality, housing quality and transport policies provide a good basis for the scrutiny of neighbour impacts, given that high quality development by definition should not result in adverse impacts on the amenity enjoyed by surrounding occupiers, and should encourage positive behaviours relating to broader objectives. However this policy provides specifications around the aspects that cause most concern as well as emphasises the potential for a more rounded, positive approach to neighbourliness that is aligned with the Council’s Resilience Agenda and convergence objectives. The Local Plan Core Strategy seeks the creation of successful, healthy and safe places while protecting existing environments. This policy sets out detail around the securing of improvements to character and the successful integration of the differing land uses necessary to meet the range of needs in the Borough (both residential and commercial) Local Plan Core Strategy design, housing quality and transport policies provide a basis for the scrutiny of neighbour impacts however this policy there is scope to broader Central Agenda and the high level strategic objectives of the Local Plan Core Strategy.

2.7d The policy builds on the ‘agent of change’ principle, whereby it is considered to be the responsibility of the developer of the new use/development to ensure remediation measures to address the potential negative impact on existing lawful uses before it
2.8 All scales of development (including domestic extensions, or conversions and changes of use) have the potential to impact upon neighbours and the neighbourhood from the start of construction through to the on-going operation of a site. This policy addresses a range of neighbourhood issues and sets out appropriate responses ranging from designing out (mitigation) to designing in (attention to detail) to contribute positively to neighbourly development. This includes adequate access and egress, connectivity with the local neighbourhood, legibility of refuse and other storage, appropriate parking arrangements as well as the qualitative aspects of street scene, all of which impact local character.

2.9 The social and environmental impacts of development, if inadequately managed or mitigated, can negatively affect the health and well-being of people and the overall ability of a place to function successfully. This policy incorporates requirements of the Healthy Urban Planning Checklist to ensure health and wellbeing and Building for Life Guidance generated from research about people’s feelings about new development and the main issues arising, is properly considered in new development at the building, site and wider neighbourhood level. This includes very specific aspects of housing quality, and public realm [interface] management. As standards improve people will begin to feel more positive about development in their local area, which is in itself a key aspect of achieving neighbourliness.

2.10 Planning is key to ensuring new development does not create problems of conflicting land uses, for example where residential uses are introduced within or adjacent to employment areas. Good planning needs to ensure for instance that local business and the economic life of the Borough is not constrained by noise and fume complaints. Likewise, good telecommunications and broadcasting services are a key component of supporting high quality communications. The siting and design of new developments are expected to consider the interference with broadcasting and telecommunications infrastructure which are a key to the enhancement of modern communities in accordance with the NPPF.

2.10a Larger new development can also significantly affect microclimates, e.g. through downdraughts and wind tunnelling, particularly when tall buildings are constructed. Neighbourly design will be expected to take into account impacts on the surrounding area and minimise negative restrict impacts outside the development site that affect the character and quality of the area and the spaces around buildings which people can enjoy. to a minimum. These impacts in turn can have wider health impacts as well as affecting people’s perception and enjoyment of place at all times.

2.11 Good telecommunications and broadcasting services are a key component of supporting high quality communications. The siting and design of new developments are expected to consider the interference with broadcasting and telecommunications infrastructure which are a key to the enhancement of modern communities in accordance with the NPPF.

2.12 The Policy also SP8 point 1f seeks to reinforce the protection and enhancement of green
infrastructure, in line with broader strategic priorities set out elsewhere in the Local Plan, specifically recognising its relevance in relation to the achievement of neighbourly development due to its environmental and quality of life benefits. In doing so, policy requires proposals to take into account any potential on or off site impacts (both direct and indirect) which could lead to quantitative or qualitative loss of green infrastructure, including private amenity space, trees, woodland, and public open space. This includes adequate consideration of negative impacts on biodiversity elements (e.g. via indirect ecological pathways such as impacts on drainage, habitat connectivity and shadowing). In relation to private amenity space, the policy protects garden land from development that results in its loss, in line with the NPPF and London Plan Policy 3.5, seeking to recognise its role in providing for relief from urban intensity and as places of retreat. Proposals however should seek not simply to avoid such impacts, but to take opportunities to positively contribute to quality, quantity or accessibility of green infrastructure provision on or off site, including where appropriate, improvements to cross boundary accessibility (such as in the case of the Lee Valley Regional Park).

2.13 The environmental standards and design guidance in Table SP.E set out to assist developers in the creation of successful, healthy and safe places through the use of recognised quality benchmarks and standards which in turn are used to help assess developments’ neighbourliness. Such standards play a key part in defining creating, for example, how places can be designed to ensure all that need to, or would benefit from doing so, people can live throughout their lifetime. In line with sustainability objectives and the Council’s resilience agenda a key aspect of more neighbourly development is the extent to which all users can access development with equitable ease.

2.14 All the aspects of the policy work together to impact on the nature of a place, neighbourhood or building, and the extent to which people can live happily, healthily and resiliently. Overall the policy aims to ensure the maximum benefit of development (in accordance with convergence aims) is sought and that development contributes positively to the creation of a high quality built environment and local perception of place.

Implementation

2.14a Overall the policy aims to ensure the maximum benefit of development (in accordance with convergence aims) is sought and that development contributes positively to the creation of a high quality built environment and local perception of place.

2.15 Policy will be implemented primarily via the development management process. Other policies to which there is a logical link are highlighted encouraging responses that deal with the issues in an integrated way. Proposals should be accompanied by statements detailing their response to the components of Neighbourly Development set out in the policy in design and management terms. Information should be sufficient to make adequate assessment against the required guidance and standards. Other policies to which there is a logical link are highlighted encouraging responses that deal with the issues in an integrated way. Where necessary, neighbourliness measures will be secured by condition and/or legal agreement.

2.16 The policy intention is that applicants should pay attention to the environmental, social
and design based impacts of their proposals on neighbourliness within the site and in the immediate area. In positive planning terms, the idea is to maximise the benefit of development through the ways in which it interacts with and plays its part in the wider context. It should encourage, for example car club spaces open to all to reduce parking stress and secure more sustainable travel behaviours in a neighbourhood as a whole, a new development providing a missing walking network link through the site, or a new building for a particular community designed to respond to a more general lack of community space and to be welcoming to all. Early consideration of these matters will be encouraged through pre-application advice/design review and in implementing other consents approaches such as Permission in Principle, as well as through more proactive regeneration and local implementation plan work.

2.16a In promoting an agent of change approach to new development it is important that consultation should take place with existing operators/occupiers to ensure that new development is deliverable and that the two uses are able to operate alongside each other; not just physical neighbours but also river, air and highway traffic regulated by the Port of London Authority (PLA), Civic Aviation Authority (CAA) and Transport for London (TfL who should also be consulted). It is recognised that the presence of London City Airport in close proximity to high profile regeneration sites creates particular sensitivities in terms of high levels of background noise at these new residential developments. Higher development costs are to be anticipated in these areas because of the necessity for effective design and building interventions that will enable residential development to proceed in areas that might otherwise have been considered unsuitable. Similarly, effective noise insulation of existing housing in the vicinity of the airport is desirable to protect living conditions. At the same time, the Agent of Change approach should not be construed as offering a licence to existing operators and occupiers for the unfettered intensification of disturbance-generating activity or other unreasonable behaviour: it is assumed that uses should be operating lawfully and reasonably.

2.17 To support applications, proposals should pay attention to the quality benchmarks and standards and associated guidance set out in Table 1. Expert advice will be taken within the Council or relevant partners to support these assessments and to ensure proposals are of the highest quality and address Neighbourly Development from the outset, and these benchmarks, standards and guidance documents are important to make that assessment. Where a development concerns an existing building (through conversion, extension, change of use) which does not meet such standards, this will be a consideration in itself as regards its suitability for the proposed change.

Monitoring

2.17a The monitoring framework set out in the Local Plan: Core Strategy covers many aspects of design quality that relate to neighbourliness, including monitoring of housing standards, electric vehicle charging points, flood risk mitigation and design quality auditing, as such, this policy does not have specific output indicators of its own, other than a policy use and robustness requirement. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, road traffic casualties, air quality, traffic congestion, and crime/fear of crime levels reported under other policies. Outcomes relating to the wide concept of neighbourliness are difficult to measure, so some indicators (notably community cohesion, satisfaction with the area) are necessarily proxies monitored through corporate surveys. Ongoing informal engagement with residents and elected
members, and complaints data also provides useful feedback on neighbourliness issues. Decisions and appeals monitoring, which can include audits for additional scheme features such as car clubs and electric car charging points also supports assessment of policy relevance and effectiveness.

2.17b Indicators

i. **SP-OP10 Policy Use and Robustness** – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];

ii. **SP-OUT1 Successful Place-making and Design:**

   a. Crime and fear of crime [no specific target, should be improving];

   b. Satisfaction with the area [maintain above 75%, should be improving].
SP9 Recognising Managing Cumulative Impact

Proposals which address the following strategic principles, spatial strategy and technical criteria will be supported:

1. **Strategic principles**
   
a. All development proposals will be expected to avoid creating or adding to problematic cumulative impacts, helping instead to engender healthy, successful places, and creating sustainable development. Development proposals will, and helping to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

   **To this end, within identified areas of cumulative impact concern, proposals that positively respond to the following will be supported:**

2. **Spatial Strategy**
   
a. Within the following areas of cumulative impact concern particular impacts should not be added to, and should preferably be ameliorated.

   **Table SP.F Areas of Cumulative Impact Concern**

<table>
<thead>
<tr>
<th>Area</th>
<th>Impact of concern</th>
<th>More detailed policy requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Management Area(s) (AQMAs)</td>
<td>An increase in the concentration of specified pollutants or increased exposure to them.</td>
<td>SP2 &amp; SC5</td>
</tr>
<tr>
<td>Water Quality Stress Zones</td>
<td>Water quality.</td>
<td>SC4</td>
</tr>
<tr>
<td>Critical Drainage Areas and Flood Zones 2 and 3</td>
<td>Run off and flood risk from surface water run-off or fluvial and tidal sources</td>
<td>SC3</td>
</tr>
<tr>
<td>Areas of Parks Deficiency</td>
<td>Distance to parks of particular sizes and any loss of parks, or their functionality, or other loss of open space/blue ribbon assets that provides compensation for lack of park access of a particular type.</td>
<td>INF7</td>
</tr>
<tr>
<td>Congestion Zones</td>
<td>Congestion.</td>
<td>SP3, SP7 and INF2</td>
</tr>
<tr>
<td>Licensing Saturation Policy Zones</td>
<td>Crime and Disorder; Public Nuisance; Protection of Children from Harm.</td>
<td>SP2 and SP6</td>
</tr>
<tr>
<td>Health and Safety Executive Consultation Zones</td>
<td>Risk to people from Major Hazard Sites and Pipelines.</td>
<td>SP2</td>
</tr>
<tr>
<td>Public Safety Zone (Airport)</td>
<td>Risk to life by presence of people.</td>
<td>INF1, SP2</td>
</tr>
</tbody>
</table>
1. Within Air Quality Management Areas (AQMAs), an increase in the specified pollutants will be avoided. Where proposals are likely to result in an increase in the concentration of pollutants or increased exposure to them, mitigation measures will be required in accordance with policy SP2.

2. Within Water Quality Stress Zones, proposals will ensure that there is no reduction in water quality and where possible will introduce mitigation measures to improve water quality, in accordance with policies SC5, SC4 and INF7.

3. Within Critical Drainage Areas and Flood Zones 2 and 3, proposals will ensure there is no worsening of flood risk from surface water run-off or fluvial and tidal sources, and will introduce measures to improve run-off, in accordance with policies SC3 and SC5.

4. Within Areas of Parks Deficiency, proposals will ensure that satisfactory access to open space is maintained and where possible, will address deficiencies in quantity, quality and access to open space ensuring that quality of existing open space in the borough is not compromised by new development, in accordance with policies SC4 and INF7.

5. Within Areas of Deficiency in Access to Nature proposals will ensure that access to SINCs is maintained and where possible, will seek to improve access to existing, or create new, SINCs, in accordance with policies SC4 and INF6.

6. Within Sustainable Travel Opportunity Areas proposals should take the opportunity to promote the use of sustainable travel options, where possible, seeking to address impacts of traffic and congestion, in accordance with policies SP2 and INF2.

7. Within Congestion Zones proposals will ensure that there is no increase in congestion and where possible, will introduce mitigation measures, in accordance with policies SP3, SP7 and INF2.

8. Within Licensing Saturation Policy Zones proposals will have regard to the significance of the zone, demonstrating that the provisions of the Licensing Act have been adhered to and that problems (such as anti-social behaviour) will not be increased. Where necessary, mitigating measures will be introduced through appropriate management measures, in accordance with policies SP2 and SP6.

9. Within the Health and Safety Executive Consultation Zones, proposals are required to account for the cumulative risk of developments and ensure that risk from potential hazards to residents/users is not increased, in accordance with policy SP2.

10. Uses, including residential, which draw in large numbers of people compared with the present situation, will not be supported within Public Safety Zone (Airport), in accordance with policy INF1.

The above areas of cumulative impact concern are mapped in Appendix 1.
3. **Technical Criteria**

a. **In town centres, the need to maintain or contribute to the achievement of the following ensure that:**

i. **Within Primary Shopping Frontages [as shown on the Policies Map], 70% of units are** in A1 use.

   *Note: A unit comprises a single frontage premises in accordance with street naming and numbering.*

ii. **At least two-thirds of town centre leisure uses are** to be ‘Quality leisure’ uses. Units in Class D2, A4 or A3 use should therefore account for **at least 67%** of leisure uses, and Class A5 uses, amusement arcades and betting shops should not account for more than **33%**.

b. **In all areas, not resulting in exceeding any of the following definitions of area or linear the need to avoid over concentrations of specific uses (currently betting shops, takeaways, and nightly-stay hostels) by ensuring that:**

   **Linear concentrations:**

   **Linear concentrations:**

   i. **No more than two of the same specified uses are adjacent to each other; and**

   ii. **or in a row without** There is a separation distance of at least two units in other uses between them pairs (or groups if more than two units) in the same specified use (see attached map ‘Appropriate Linear Concentrations’) in a row; or

   a separation distance of two units in other uses between two units with the same specified use.

   **Area concentrations:**

   i. **A site having three or** There are no more than three other premises in the same specified use within 400m of each other; and

   iv. **A 400m catchment drawn around a proposed specified use does not** (i.e. the presence of three or more than three overlapping with any more than two other catchment areas drawn around existing or proposed units in the same specified use.

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**Policy Links**

SP2, SP3, SP6, SP7, INF1, INF2, INF5, INF6, INF7, SC3, SC4, SC5
For the purpose of Neighbourhood Planning, the following sections and associated sub-
paragraphs of this policy are considered to be strategic policies with which a neighbourhood

First map [pg. 160 of consolidated version Feb 2018] — Hot Food Takeaway Hotspots
Second map [pg. 161 of consolidated version Feb 2018] — Betting Shop Hotspots
Third map [pg. 162 of consolidated version Feb 2018] — Night-stay Hostel Hotspots
Fourth Map [pg.163 of consolidated version Feb 2018] – Other Aras of Cumulative Impact
Map: Appropriate Linear Concentration of Specific Uses — Title corrected

Revised diagrams under preparation
Map: Concentrations of hot food take-away uses in the borough
Map: Concentrations of betting shops in the borough
Map: Concentrations of nightly stay hostels in the borough
New map representing an amalgamation of the following DSPDPD figures:
Fig.1: Air Quality Management Zones
Fig.3: Water Quality Stress Zone
Fig.7: Licensing Saturation Zones
Fig.8: Health and Safety Executive Consultation Zones
2.20 In Urban Newham a concerted effort needs to be made to ensure that every small change counts, preventing existing problems getting worse, beginning to reverse them, and thereby setting in train more positive circles. This approach will support the overarching objective in the Local Plan to create high quality places and balanced communities. Where the combined impact of new development adds up to something of greater significance (positive or negative) than when assessed on its own, this is summarised as having ‘cumulative impact’. Whilst policy already highlights problems of cumulative impact as a design consideration, this policy provides clearer direction in terms of the range of cumulative impact issues that should be considered. Recognition and effective handing of cumulative impact will optimise development and help to deliver growth in the borough which are also two of the overarching objectives of the Local Plan.

2.21 Negative effects where cumulative impact is (or may be in certain areas) significant, range from traditional amenity and environmental concerns (noise and activity levels at unusual hours; odour, air and light pollution; traffic congestion; microclimate and drainage effects; litter and visual intrusion) to impacts on safety risks and behaviour as well as the character and liveability concerns of an area. Such negative impacts may affect health and wellbeing, and the extent to which people are satisfied with an area or prepared to visit, invest, spend and stay in that area e.g. affecting regeneration and investment prospects, impeding the delivery of sustainable development.

2.22 Some cumulative impacts do not have spatial indicators to allow them to be measured (i.e. daylight/sunlight). However, the cumulative significance of certain impacts is already recognised through existing designations derived through established methodologies or legislation, These include the Air Quality Management Area, Water Quality Stress Zones, Critical Drainage Areas and Flood Zones, Airport Public Safety Zone, areas of park / access-to-nature deficiency, Health and Safety Executive Consultation Zone and the Licensing Saturation Policy Zones. These are drawn together under this policy to emphasise their significance for planning purposes, particularly at the design stage. In addition, the policy and associated designations sets out new areas – informed by an updated evidence base – that address other deficiencies and excesses and take opportunities for encouraging more virtuous cumulative impact processes. These include Congestion Zones (TFL traffic-flow monitoring, areas of significant delays), and Sustainable Travel Opportunity Areas.

2.23 The issues addressed by these designations are relevant to all forms and scale of development. In assessing appropriate responses to these designations as directed by the policy, the advice of internal and external experts will be sought where appropriate.

2.23a In Newham uses such as hot food takeaways, betting shops, premises selling alcohol / entertainment premises, and private rented properties, mainly HMOs and specialist hostels, are noted as having a potential problematic cumulative impact when numbers increase. Various problems arise through overconcentration of uses, including impacts on an area’s character as well as healthy lifestyles of the population. With these types of issues, cumulative impact will be about the extent to which a use or activity affects the feel and appearance of an area.
Local Plan Core Strategy Policy SP6 already seeks to maintain a robust retail core, where non-retail uses are prevented from clustering. To further manage negative cumulative impacts, the policy targets potential problematic uses, defining a minimum proportion of more desirable uses in certain areas, as well as ‘tipping points’ at which numbers of such uses cumulatively (clusters) are unacceptable. These have been derived through a combination of engagement and spatial analysis, recognising the impact of patterns of landuse across small spatial extents, 400m being a typical five-minute walk time.

In the case of linear concentrations, assessment will ignore intervening road junctions and continue around corners where relevant; with regard to area concentrations Figure X provides example illustrations of what may and may not be acceptable. In terms of area concentrations, Figures 11 to 13 (Appendix 1) Hot Food Takeaway Hotspot, Betting Shop Hotspots and Night-stay Hostel Hotspots maps above provide indicative mapping of existing uses, identifying ‘hotspots’ where three or more 400m catchment areas overlap and where further proposals for identified uses will—exceed the policy threshold not generally be supported. The other Areas of Cumulative Impact map sets out Air Quality Management Areas, HSE Executive Zones and Licensed Premises Concentration (Saturation Policy) Zones and Water Quality Stress Areas.

Origins of Cumulative Impact Zones

Aside from the Airport Public Safety Zone, the designated Cumulative Impact Zones are not included on the Local Plan Policies Map. Maps of the zones can be found in Appendix 1.

Air Quality Management Areas Fig.1 (see map above) are zones identified as in need of particular air quality management measures due to the extent of air quality ‘exceedences’ i.e. days when air quality limits exceed national guidelines, and hence the failure to meet air quality objectives. As such, anything that is likely to increase emissions of targeted pollutants (in this case, particulates and nitrogen dioxide) or increase exposure to them is likely to be of concern, and require at least mitigation. In assessing this, advice will be sought from Environmental Health and the Environment Agency.

Areas of Water Quality Stress Fig.3 (see map above) shows areas identified in the Environment Agency’s River Basin Management Plan (2009, as updated in 2012) as in need of improvement through a variety of in-river and adjoining site management interventions in respect of particular water quality features (e.g. levels of ammonia, phosphate, dissolved oxygen). It is proposed that these are designated in cumulative impact terms to secure at least no-net-worsening of water quality, and preferably a positive response that contributes to improvements, in accordance with policies SC4 and INF7 which require the protection and enhancement of aquatic and riparian habitats. Proposals should have regard to the EU Water Framework Directive and the recommendations and objectives of relevant River Basin Management Plans.

Critical Drainage Areas Fig.4 (see policy SC3 map) Critical Drainage Areas were identified as part of Newham’s 2011 Surface Water Management Plan, they are defined as the contributing catchment areas that feed into /influence the predicted flood extent (where flood risk might otherwise be low). Within these areas drainage problems are already significant and should not be worsened by new development and instead should be improved by it.
2.28 **Flood Zones 2 and 3** (see policy SC3 map) are defined through Planning Practice Guidance, at paragraph 065, defines Flood Zones 2 and 3 as follows:
- Zone 2, medium probability; land having between a 1-in-100 and 1-in-1,000 annual probability of river flooding, or land having between a 1-in-200 and 1-in-1,000 annual probability of sea flooding.
- Zone 3a, high probability; land having a 1-in-100 or greater annual probability of river flooding, or land having a 1-in-200 or greater annual probability of sea flooding.
- Zone 3b, the functional flood-plain; land where water has to flow or be stored in times of flood (not separately distinguished from Zone 3a on the Environment Agency’s Flood Map).

2.29 In these areas, flood risk is already clearly a significant issue requiring design mitigation and risk management responses.

2.30 **Areas of Parks Deficiency** (see policy INF7 maps) are derived from mapping of the categories of public open space and catchment areas in accordance with London Plan Table 7.2. Where addresses fall outside catchment areas, they are considered to be in areas of deficiency as per policy INF6. A positive policy response is required by policy INF6, which states that deficiencies in quantity, quality and access to open space will be addressed, and which identifies quantity (and quality) of District and Local Parks as key priorities. In reference to Fig 5d, given the linear nature of the LVRPA areas, these are not counted against the overall deficiency of regional and metropolitan parks.

2.31 **Areas of Deficiency in Access to Nature** (see map above) are areas defined by a Pan-London methodology on behalf of the GLA by Greenspace Information for Greater London (GIGL). They relate to public access to Sites of Interest for Nature Conservation (SINCs) of borough-wide significance and above. Where residents have to walk more than 1km to access such sites, they are considered to live within an Area of Deficiency in Access to Nature. The requirements of policies INF6, SP2 and SC4 are that this deficiency should be addressed by protecting existing SINCs, improving public access, and by seeking to create new SINCs, some of which are proposed in this DPD.

2.32 **Licensing Saturation Policy Zone** (see map above) is a designation under section 182 of the Licensing Act 2003, whereby applicants for licences for selling alcohol and late night premises licences are required to demonstrate that they will not worsen defined problems: crime and disorder, public safety and nuisance. In planning terms these should be used as informative designations to highlight where there are existing clusters of uses associated with high levels of anti-social behaviour. As such, where application is submitted it must provide sufficient surety that it will not worsen such problems via appropriate management measures, and where necessary, exclusion based on clustering definitions.

2.33 **Health & Safety Executive Consultation Zones** (see map above) are defined around major hazardous installations, and require the Health and Safety Executive to be consulted on development proposals within them where they fall into certain categories, notably, where they involve residential and other uses that would increase the number of people exposed to a potential hazard. In planning terms, this will affect the distribution of such uses and hazard management, with the objective of not worsening existing risk. It should be noted, however, that in some places decommissioning is proposed which would remove...
these zones; the timeframe within which this occurs may therefore alternatively affect development phasing.

2.34 Airport Public Safety Contour and Zone (Airports) Fig. 2 (see policy INF1 map) is defined by the Civil Aviation Authority (CAA) reflecting risk of aviation-related accidents. The stated objective is to reduce or not worsen the number of people exposed to that risk. As such ‘there should be no increase in the number of people living, working or congregating in Public Safety Zones, and over time, the numbers should be reduced as circumstances allow’ (Circular 1/2010). Therefore, in planning terms, development that would increase the number of people living, working or passing through the zone would not be supported. In assessing this, advice is sought from London City Airport, the CAA and Department for Transport (DfT) where applicable.

2.35 Sustainable Travel Opportunity Areas Fig. 9 are derived from mapping areas of very high public transport accessibility, (PTAL 6a or 6b) immediate or very easy public transport access to extensive town centre facilities, high levels of sustainable transport usage, and low levels of car ownership (except East Ham Central where it is relatively high, above the Borough average according to census 2011 data). In cumulative impact terms, they represent the opportunity to promote active travel and public transport to help address cumulative impacts of traffic congestion and traffic generally (e.g., emissions) in the wider local area: each area identified (other than West Ham) coincides with a Congestion Zone. Positive policy responses in accordance with sustainable travel objectives (policies SP2 and INF2) e.g., car club provision, below maxima parking provision, will be expected.

2.36 Congestion Zones Fig. 10 (see policy INF1 map) These are the areas in the Borough where traffic congestion is consistently poor throughout the day (delay in traffic greater than 1.5 mins per km). This distribution is derived from a combination of peak morning, inter-peak and peak afternoon congestion data provided by Traffic Master. These are areas where development with traffic impacts should ensure that they are mitigated as far as possible to reduce congestion.

Implementation

2.37 The policy will be applied through the Development Management process, with a site being identified as falling within any relevant areas of cumulative impact concern through GIS-mapping through the application of GIS analysis in the assessment process, drawing on the Council’s survey work and associated GIS records, and through the use of appropriate conditions and, or legal agreements. The policies referenced stipulates the expected response to each impact which should be set out in a statement accompanying the application, and secured by conditions or legal agreements as appropriate. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.

2.37a It is also the Council’s intention that its published evidence base on these matters helps to indicate the in-principle acceptability (or otherwise) of relevant proposals in particular locations. Monitoring will be carried out via surveys every other year to update this: see Indicators. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.
2.38 The policy intention is that the full breadth of cumulative impact issues that affect the borough are acknowledged at every scale of development, the nature of cumulative impact being that impacts large and small together combine to be of greater significance. Early consideration of these matters will be encouraged through pre-application advice/design review and in implementing other consents approaches such as permission in principle, as well as through more proactive regeneration and local implementation plan work.

2.39 To support applications, proposals should refer to the supporting documents, relevant updates and if appropriate, specific agencies indicated in the policy.

Monitoring

2.40 The monitoring framework set out in the Local Plan: Core Strategy covers many aspects of cumulative impact, including monitoring of environmental nuisance, air and water quality, infrastructure sufficiency and traffic congestion, and indicators relating to relating to town centre health/quality and healthy urban planning. In relation to outputs, of key importance will be ensuring explicit consideration of cumulative impacts where relevant, in the officer’s decision, and as such policy usage monitoring and associated output measures will be of particular relevance. These are furnished through consents monitoring and town and local centre survey work which updates GIS databases. There is scope within these to further scrutinise betting shop and nightly-stay hostels consents. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, and mortality and obesity statistics. Decisions and appeals monitoring also supports assessment of policy relevance and effectiveness.

2.40a Indicators

i. SP-OP2 Healthy Urban Planning:

   a) Number of new takeaways permitted [no specific target: monitor for evidence of downward trend or sustained low levels];

ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];

iii. SP-OP9 Cumulative Impact:

   a. Number of Betting shop approvals [no specific target: monitor for evidence of downward trend or sustained low levels];

   b. Nightly stay hostels approved [no specific target: monitor for evidence of downward trend or sustained low levels];

iv. SP-OUT1 Successful Place-making and Design:

   a. Crime and fear of crime [no specific target, should be improving];

   b. Satisfaction with the area [Maintain above 75%, should be improving];
v. SP-Out-2 Healthy Urban Planning:

a. Mortality rate [achieve convergence with London average, should be improving];

b. Rates of physical activity, childhood obesity and mortality linked to circulatory diseases [no specific target, should be improving];

c. Air Quality Exceedances [as per Air Quality Management Plan];

d. Resident perceptions in the annual Newham Survey [no specific target, should be improving];

vi. SP-OUT4 Town Centre Health:

a. Monitor vacancy Levels and non-retail uses in primary frontages in town centres [no specific target, should be holding steady or improving];

b. Monitor historic buildings at risk within defined town centres [Entries for Newham should decline annually];

c. i. Monitor quality Leisure: Proportion of leisure uses in town centres that are betting shops, amusement arcades and hot food takeaways [no specific target, should be holding steady or improving];

   ii. Distribution of takeaways, betting shops and hostels [no specific targets but there is an expectation that overconcentration of these identified uses will reduce over time].

d. Resident perceptions of town centres in yearly Newham Survey [no specific target, should be holding steady or improving];

e. London Town Centre Health Check, Newham Town Centre and Retail Study and other relevant studies [no specific target, should be holding steady or improving]; all to be monitored against London average where possible; otherwise monitor for appropriate trends in line with IIA objectives.

SP10 Managing Cumulative Impact

Objective

2.41 To ensure that sustainable development is achieved through the management of existing identified problems of cumulative impact relating to specific uses.

Policy
Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

To this end, proposals that positively address the following will be supported:

1. In town centres, the need to maintain or contribute to the achievement of the following:
   
   a. Within Primary Shopping Frontages, 70% of units in A1 use.
   
   b. Two-thirds of town centre leisure uses to be ‘Quality leisure’. Units in Class D2, A4 or A3 use should therefore account for 67% of leisure uses, and Class A5 uses, amusement arcades and betting shops should not account for more than 33%.

2. In all areas, not exceeding any of the following definitions of area or linear concentrations of specific uses (currently betting shops, takeaways, and nightly-stay hostels).

   **Linear concentrations:**
   
   a. two of the same uses in a row; or
   
   b. a separation distance of two units in other uses between two units with the same specified use.

   **Area concentrations:**
   
   c. a site having three or more other premises in the same use within 400m (i.e. the presence of three or more overlapping catchment areas)

   The area concentrations of identified uses are indicatively mapped within Appendix 1 of this document.

**Policy Links**

SP2, SP3, INF1, INF2, INF5, INF6, INF7, SC4, SC5

**Reasoned Justification**

2.42 In Newham uses such as hot food takeaways, betting shops, premises selling alcohol / entertainment premises, and private rented properties, mainly HMOs and specialist hostels, are noted as having a potential problematic cumulative impact when numbers increase. Various problems arise through overconcentration of uses, including impacts on an area’s character as well as healthy lifestyles of the population. With these types of issues, cumulative impact will be about the extent to which a use or activity affects the feel and appearance of an area.

2.43 Local Plan Core Strategy Policy SP6 already seeks to maintain a robust retail core, where non-retail uses are prevented from clustering. To further manage negative cumulative impacts, the policy targets potential problematic uses, defining a minimum proportion of more desirable uses in certain areas, as well as ‘tipping points’ at which numbers of such
uses cumulatively (clusters) are unacceptable. These have been derived through a combination of engagement and spatial analysis, recognising the impact of patterns of landuse across small spatial extents, 400m being a typical five-minute walk time.

2.44 In the case of linear concentrations, assessment will ignore intervening road junctions and continue around corners where relevant. In terms of area concentrations, Figures 11 to 13 (Appendix 1) provide indicative mapping of existing uses, identifying ‘hotspots’ where three or more 400m catchment areas overlap and where further proposals for identified uses will not generally be supported.

Implementation

2.45 Policy will be implemented through the development management process through the application of GIS analysis in the assessment process, drawing on the Council’s survey work and associated GIS records, and through the use of appropriate conditions and, or legal agreements. It is also the Council’s intention that its published evidence base on these matters helps to indicate the in-principle acceptability (or otherwise) of relevant proposals in particular locations. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.

Monitoring

2.46 Effectiveness will be monitored via the framework set out in the Local Plan: Core Strategy, specifically indicators listed in relation to the Successful Places theme, particularly those relating to town centre health/quality and healthy urban planning. These are furnished through consents monitoring and town and local centre survey work which updates GIS databases. There is scope within these to further scrutinise betting shop and nightly stay hostels consents. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, and mortality and obesity statistics. Decisions and appeals monitoring also supports assessment of policy relevance and effectiveness.
**Glossary**

**Affordable Housing**: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or the subsidy to be recycled for alternative affordable provision.

**Arc of Opportunity**: The stretch of land from Stratford and the Olympic Park, down the Lower Lea Valley and east through the Royal Docks to Beckton (see Spatial Portrait Map). Historically a primarily industrial area, it has undergone much change in the economy after decades of public investment in land assembly, remediation, and infrastructure development, including under the auspice of the Olympic and Paralympic Games in 2012. Large scale transformational change is ongoing, contributing to the area becoming more mixed use and densely developed, or in effect, urbanising relative to what elsewhere in the borough increasingly seems suburban.

**Convergence [DSPDPD]**: The aim that in Newham and the other five Growth (formerly Host) boroughs – Greenwich, Tower Hamlets, Hackney, Barking and Dagenham and Waltham Forest – that within 20 years the communities who host the 2012 Games will have the same social and economic chances as their neighbours across London.

The Convergence Framework comprises three themes, each of which has specific objectives and action plans:

- Creating wealth and reducing poverty
- Supporting healthier lifestyles
- Developing successful neighbourhoods

**Enterprise Zone (EZ)**: An Enterprise Zone provides business rate discounts and enhanced capital allowances for new businesses locating in the EZ and simplified local authority planning for new developments. It also enables any additional business rate income collected in the EZ to be retained and recycled locally for a period of 25 years. The Royal Docks Enterprise Zone became operational in 2013 to support local development and economic growth.

**Equalities Impact Assessment (EqIA)**: is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on groups protected...
by equalities legislation, notably the Equalities Act 2010. This Act places a general
duty on the council as a public body to pay due regard to advancing equality,
fostering good relations and eliminating discrimination for people sharing certain
protected characteristics. EqIA is therefore an essential tool for demonstrating the
Council has complied with the law by shaping the way decisions are taken and
thereby improving outcomes. It enables a good understanding of needs and
differential impacts that Local Plan policies may have on different groups.

**Green Enterprise District:** This is an area covering 48km² of land in East London,
which aims to create a thriving economic region, which could lead the world in
developing and providing low carbon goods and services.

**Habitats Regulations Assessment (HRA)** is a requirement of the European
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and
Flora (the ‘Habitats Directive’), and the Conservation (Natural Habitats, &c)
(Amendment) (England and Wales) Regulations 1994 (as amended 2007)
implemented in the UK through the provisions of the Conservation of Habitats and
Species Regulations 2010. An HRA assesses the impact of Local Plans on
habitats and species of European significance. The HRA of the Newham Core
Strategy Local Plan can be found on the Council’s website, either within the
Integrated Impact Assessment (IIA) or as an addendum.

**Health Impact Assessment (HIA):** is a systematic approach to predicting the
magnitude and significance of the potential health and wellbeing impacts, both
positive and negative, of new plans and projects. The approach ensures decision
making at all levels considers the potential impacts of decisions on health and health
inequalities. HIA is particularly concerned with the distribution of effects within a
population, as different groups are likely to be affected in different ways, and
therefore looks at how health and social inequalities might be reduced or widened by
a proposed plan or project.

**Integrated Impact Assessment (IIA):** addresses all of the Council’s legal duties to
carry out impact assessments of a plan within one integrated process. It fulfils
statutory requirements for the Sustainability Appraisal (SA) and Strategic
Environmental Assessment (SEA) and incorporates the requirements for Health
Impact Assessment, Equalities Impact Assessment (EqIA), and Habitats Regulations
Assessment (HRA). Integrating the assessments in this way ensures a
comprehensive approach that informs the development of plan policies. As many of
the issues considered in the assessments overlap in practice, an integrated
approach is thought to produce better recommendations and outcomes. The IIA is an
iterative process that considers the impacts of emerging policies and proposes
alterations to them or mitigation for any adverse impacts that may be identified. The IIA can be found on the Council’s website.

International Centre: Part of the Retail Hierarchy – see below.

Joint Waste Development Plan Document for the East London Waste Authority Boroughs (Joint Waste DPD): This is a waste strategy produced jointly by the London Boroughs of Newham, Barking and Dagenham, Havering and Redbridge for the management of waste arising after they have been collected and sorted for recycling, recovery or disposal. The document provides lists of operational and proposed waste management sites; these are safeguarded in the Core Strategy Local Plan.

Major Development [DSPDPD]: Defined by the London Plan as:
- for dwellings: where 10 or more are to be constructed (or if number not given, the area is more than 0.5 hectares); and
- all other uses: where the floorspace will be 1000 square metres or more (or the site area is 1 hectare or more). The site area is that directly involved in some aspect of the development. Floorspace is defined as the sum of floor area within the building measured externally to the external wall faces at each level. Basement car parks, roof top plant rooms, caretakers’ flats etc. should be included in the floorspace figure.

Retail Hierarchy: An interrelated network and hierarchy of retail and associated service provision. In Newham, as per the London Plan definition, this comprises:

- Town Centres: Defined area which may be a successful economic places or destinations in their own right containing town centre uses. This is a collective term for:
  - International Centre, defined as: London’s globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibility
  - Metropolitan Centre (Stratford), defined as: serve wide catchments which can extend over several boroughs and into parts of the wider South East region. Typically they contain at least 100,000 sq.m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions.
  - Major Centre (East Ham), defined as: typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sq.m of retail, leisure and service
floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.

- District Centre (Canning Town, Forest Gate, Green Street and East Beckton), defined as: distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 – 50,000 sq.m of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.

- Local Centres, defined as: An accessible area of shops and services which perform a local shopping and service role, typically serving a localised catchment, often most accessible by walking and cycling, and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500sq.m), sub-post office, pharmacy, laundrette and other useful local services. Together with District centres they can play a key role in addressing areas deficient in local retail and other services.

- Local Shopping Parades: Small groups of shops (three or more units).

Social housing: A collective term for affordable housing delivered within a scheme as either social rented or affordable rented housing, or a combination of the two products.

Specialised/Specialist Housing: Housing which meets the specialised housing needs of groups such as older and disabled people (Policy H3).

Sustainability Appraisals (SAs) assess the likely environmental, economic and social impact of plans and integrate sustainable development considerations into the plan-making process. SAs are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). Government guidance ‘A Practical Guide to the SEA Directive (ODPM 2005), and the ‘National Planning Policy Framework (NPPF) 2012’ and Planning Practice Guidance (PPG) have merged this process to allow for a single joint appraisal (SA/SEA) to be carried out. In Newham, the SA forms part of the Integrated Impact Assessment (see definition above).

Town Centre Uses: Defined in the Local Plan and reflecting the ‘Main town Centre uses’ definition of the NPPF as: Retail, including warehouse clubs outlets leisure entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-throughs, bars, pubs and clubs, casinos, health and fitness
centres, bowling and bingo), offices, arts, culture and tourism (including theatres, museums, galleries and concert halls, hotels and conference facilities) and community facilities (including colleges, health care facilities, libraries, contact centres, places of worship and community centres).

**Unit:** Distinct part of a building or land used solely for one specific purpose. For the interpretation of policy **SP10 SP9**, a unit relates to a single frontage unit in accordance to street naming and numbering.

**Urban Newham:** The areas located outside the Arc of Opportunity. See also Web of Opportunity definition below.

**Web of Opportunity:** is the stretch of land outside of the Arc of Opportunity, also known in the Local Plan as Urban Newham. The Web is a concept used to describe the potential cumulative benefits derived from development of Strategic Sites in this area, wider town centre growth in part stimulated by Crossrail investment, and other smaller scale opportunities, leading to important transformational change in the more historic neighbourhoods of Newham and wider impetus for investment and regeneration.