7.1 Waste and Recycling: Is policy INF3 justified and realistic, especially in relation to:

(i) The waste site allocation at Beckton Riverside (policy INF3.2.b);

(ii) The East London Waste Plan, for example in terms of safeguarding of land for a future waste facility;

These clauses of the question are taken together as they address the same issues.

It has been clarified that the 2012 Joint Waste Plan Schedule 2 waste site known as Beckton Riverside is not in fact a site ‘allocation’ and should not have been referred to as ‘safeguarded’ in part 2b of policy INF3. This is discussed in more detail in the SoCG prepared between LBN, TfL and National Grid in relation to Strategic Site S01, and corrected via amendments set out in the Post Submission Minor Amendments Schedule. (For the sake of clarity it is perhaps worth noting that ‘Beckton Riverside’ in the JWP is a sub-area of the Strategic Site now known as Beckton Riverside S01 in the Local Plan)

The handling of the Schedule 2 site in the updated text of INF3 is justified as it is consistent with the adopted Joint Waste Plan and accurately reflects the meaning of policy W2 (that strategic waste capacity needs should firstly be met through existing sites and their reconfiguration/intensification and secondly that support for waste uses within Schedule 2 sites is given where they will contribute to unmet apportionment).

Policy INF3 is realistic as it recognises the significant development potential of the location (i.e. for a mix of uses and a whole new neighbourhood) while accounting both for the existing Joint Waste Plan and the likely review of that document, as well as updated employment land evidence base. Significantly, the 2012 JWP was prepared to meet the apportionment figures of the 2011 London Plan. While Newham’s apportionment share has remained fairly steady in revisions since then (4.9% in the 2011 plan, 4.7% in the 2017 draft), what that means in apportioned tonnage has decreased; 458 (thousand tonnes per annum) by 2021 under the 2011 plan compared to 384 under the draft 2017 plan. Under the latest (draft) figures, what was Newham’s 2021 target (405) is now closer to the target for 2041 (407); an additional 20 years grace. This change reflects advances in technology and the promotion of the circular economy, as greater re-purposing and re-use mitigates the effect of population growth.
The position that no need for the site must be demonstrated either through JWP review or provision of robust evidence by potential developers is reasonable and consistent with the strategic status of the Joint Waste Plan. The wording accounts for the likelihood that the JWP will have been reviewed by the time proposals for Beckton Riverside come forward (bearing in mind the scale and complexity of the site) but also, in the event that it has not been, the potential for equivalent technical evidence to be produced - as for example is done for sequential test work in other policy areas.

The safeguarding of land (i.e. Schedule 1 sites) under the JWP continues and is not undermined by policy INF3 as drafted. As above, the meaning of policy W2 is not to ‘safeguard’ Schedule 2 sites from other development but to indicate that these locations would be suitable for waste uses as needed. The slight re-direction of the area of search to remaining SIL on the Beckton Riverside site (see latest text of INF3) is consistent with updates to the SIL designation and locational principles behind the original Schedule 2 site set out in Policy 5.17 of the London Plan, (the requirement that it should be SIL or LIL) and the reference in W2 to other designated industrial areas being supplementary appropriate areas of search. The wording of the JWP itself confirms that the Schedule 2 sites were intended to be used flexibly, at 5.10; ‘a number of areas within which potentially available and suitable sites...can be located’ and that the first ‘port of call’ should in fact be existing waste sites (5.12).

LBN’s Employment Land Review (ELR) Part 2 demonstrates that sufficient capacity exists within the remaining borough-wide SIL and LIL reservoir to accommodate forecast demand plus a buffer, and that the demand forecasts used incorporate waste management needs. The buffer allows for displacement / sub-regional needs and would be further increased by the intensification of LIL/SIL as promoted by both the Local Plan and draft London Plan.

Policy INF3 is therefore justified by the updated evidence base concerning employment land and is consistent with the adopted JWP whilst being cognisant of its likely review and the ongoing promotion of the circular economy reducing waste management requirements.
(iii) Whether waste sites should specifically refer to air quality in its coverage of impacts on residential living conditions (policy INF.1.a); and

INF3 (1a) sets out that waste facilities will ‘minimise spatial impacts’. Following changes set out in the Schedule of Minor Modifications, the implementation section explains at paragraph 6.233d that ‘spatial impacts’ includes ‘the consideration of air quality impacts’ and any ‘effects on nearby residential amenity’. A further addition to this paragraph set out in the Post Submission Amendments Schedule indicates that applicants should refer to policy SP8 for guidance on the range of residential amenity issues that need considering.

INF3 further confirms (at 2a) that locations other than identified industrial land or safeguarded waste sites will only prove suitable for waste use where ‘acceptable mitigation of impacts can be delivered in line with other development plan policies’. An addition proposed through the Post Submission Amendments Schedule will add cross-references to confirm the link to amenity policies SP8, SP3, and SC5; SP8 in particular refers to minimum standards in relation to key issues including air quality. The implementation section confirms (again at 6.233d) that the spatial strategy is directing waste uses primarily to non-residential areas.

Further, INF3 sets out in its design and technical criteria (3a) that waste facilities should be ‘fully enclosed or provide an equivalent level of environmental protection with respect to air emissions’. The implementation section confirms that the consideration of ‘equivalent level’ will be done by Environment Agency officers through its licensing processes (6.233e).

Therefore, potential developers of waste sites will already have to pay significant regard to impacts on air quality and residential amenity, and as such the Council considers INF3 justified and realistic on this point.
(iv) It’s prioritisation of rail and water transport for waste transport over the use of the principal road network – is there sufficient rail capacity for this to be implemented without adverse impacts on existing rail use? (Policy INF3.1.a.ii)

The ‘prioritisation’ of rail and water transport for waste movements means proposals should look to the potential to use these networks before resorting to the use of the already-congested road network given the greater sustainability (and most significantly lesser air quality impacts) of these modes of transport. The policy as drafted does not exclude use of the road network and if proposals reveal the rail or water network cannot host waste movements without adverse impacts on existing use and users (as per INF2) or for operational issues, road transport may be more suitable.

Moreover, while the rail network is busy at peak times, there is capacity for freight at off-peak times, in particular at night. The use of night-time train paths for freight and other movements is encouraged by the Mayor of London’s Transport Strategy (March 2018, EB14) which recognises that freight movements overall will need to increase in line with growth. Network Rail are also progressing various projects which facilitate freight movements across the south east rail network, including freight only connections between key rail corridors. This will contribute further to rail freight capacity for waste movements.
7.2 Utilities Infrastructure: Is policy INF4 justified and realistic, in particular in relation to:

(i) Whether the policy is effective enough to meet the concerns of providers such as Thames Water, to require developers to demonstrate that adequate water supply and waste water infrastructure capacity exists both on and off site to serve the proposed development and not adversely affect other users (policy INF4.3.a)

In relation to this question and the concerns of Thames Water (TW), it should first and foremost be noted that the Local Plan’s policies are not read in isolation. The Council’s position is that when read in the round (INF4 alongside policies including INF9, SC1, and SC3 for example); considered alongside other important supporting / implementation documents like the Infrastructure Delivery Plan (IDP); and implemented within the context of established procedures of statutory consultation, the Local Plan’s approach provides plenty of hooks and safeguards that ensure full and proper consideration of utilities capacity.

TW’s concerns (as expressed through regulation 19 representations) are summarised as follows:

- That new development must ensure sufficient utilities capacity to meet its needs exists (in this case that ‘adequate water supply and waste water infrastructure exists, both on and off site’) so that development can occur without adverse impacts on existing users.
- To that end, that developers may need to undertake appraisals to determine whether a proposal will overload existing infrastructure.
- That in relation to Beckton Sewage Treatment Works (BSTW), policy appeared to suggest that mitigation to enable nearby development was the responsibility of TW.
- That the Council must accept that water and sewerage infrastructure development may be needed in flood risk areas.
- That the level of detail provided in the spatial strategy and spatial policies did not enable them to make a proper assessment of the likely impacts of expected growth, and that it was not easy to align water infrastructure needs with the Local Plan given water companies’ tendency to operate to 5 year business plans.

The ways in which the policy framework as set out deals with issues of utilities sufficiency (and thus addresses these concerns) is presented below:

S1 – The overarching vision and spatial strategy for the Plan sets out that infrastructure enhancements will keep up with growth, addressing existing deficits and cumulative impacts (S1: 1c).

INF4 – The utilities Policy acknowledges that utilities in London as a whole are stretched (para 6.235); makes clear that sufficient utilities capacity to meet the needs of a development must be demonstrated (covering an appropriate timescale and detailing proportionate
contributions or upgrades as required) (INF4: 3a); and gives ‘in principle’ support for projects contained within the IDP (INF4: 1a). With respect to water and waste utilities paragraph 6.235 acknowledges the need for enhancements to the operational capacity of Beckton Sewerage Treatment Works, while the IDP also flags these projects with further detail (see more on IDP below).

INF9 – The encompassing infrastructure delivery Policy establishes a formal link to the IDP (INF1: 1a). In addition it identifies the Arc of Opportunity as an area that will need to keep up with growth, relevant to TW is the acknowledgement of the need to expand the operational capacity at BSTW (S1: 2a). The technical criteria of INF9 also echoes INF4’s stance that assessments that demonstrate infrastructure sufficiency will be needed and should account for existing deficits as well addressing the new needs of the development (INF9: 2.a).

SC1 – In the context of growth and an associated increase in infrastructure needs, the environmental resilience policy establishes that all development should become more resource efficient (SC1: 1b), specifically addressing water use by requiring that all development incorporates water efficiency measures (SC1: 3a & b) and supports implementation of the Thames River Basin Management Plan which covers protecting and improving waters (SC1: 2a).

SC3 – Complementing the way SC1 addresses the use and consumption of water, this Policy seeks to make the handling of waste water more sustainable, promoting drainage improvements (through SUDS and run-off targets) to alleviate the strain on the traditional sewer system.

S5 – This spatial policy highlights the importance of Beckton in relation to strategic utilities capacity across the Thames Water region given the presence of Beckton Sewage Treatment Works (BSTW) (2i).

The policy framework is made even more effective when taking into consideration the implementation guidance that accompanies it, examples include:

- Setting out how developments in the vicinity of utilities sites such as BSTW should follow the ‘agent of change’ approach established in Policy SP8 and should mitigate impacts where relevant (INF4 6.235f).
- Explanation that the confirmation of sufficient utilities capacity should involve consultation with relevant providers, e.g. to determine if additional studies are needed (INF4 6.235fa).
- Confirmation that needs arising may be met on or off-site and contributions to meeting these needs could be made either physically or financially, along with a reiteration that engagement with key providers/undertakers/commissioners is required (INF4 para 6.298).
The Council notes that amendments to INF9 are proposed via the Post Submission Amendments Schedule to clarify that developers can enter into pre-application discussions to ensure that proposals are policy-compliant and that contributions to infrastructure are proportionate to the scale of development (para 6.298a and 6.298aii).

As indicated, the IDP is central to issues of utilities capacity and to infrastructure sufficiency in general. For water utilities the IDP sets out two key projects in relation to ‘Demand Management’ and ‘Effluent Reuse’ and while TW may have concerns regarding the alignment of the Local Plan with TW’s 5 year business plan period, the IDP is a live document that is consulted on and updated annually or as required. Therefore, details relating to capacity and provision of new infrastructure can be incorporated as and when it becomes available. This keeps the Local Plan as up-to-date as possible and means that TW have regular opportunities for needs arising flagged by the Plan.

It is also important not to forget procedures of statutory consultation, the Council consults TW on all major applications and TW additionally monitor LPA weekly lists in case of smaller applications that may warrant comment.

While it is considered that the Plan includes a robust set of policies, it is considered that some changes, in response to the consultation and for clarification should be made. Minor amendments to Policy INF9 (see Schedule of Minor Amendments and attached draft Policy INF9) respond to comments made by TW by tightening policy wording to protect the function of utilities sites (and other commercial/operational sites) in relation to the potential impact that they may have on new residential development. Therefore, LBN has incorporated and refined the ‘agent of change’ concept with respect to development that may take place outside of the site on land surrounding utilities installations (or other operational site) and in the case of TW Beckton Sewerage Treatment Works. Policy wording has been reviewed and consequently INF4, Part 2(h) has been introduced, to make it clear that it is the responsibility of those proposing development in the vicinity of BSTW that need to undertake odour impact assessments and this links to the requirements set out in Policy SP8 to ensure neighbourly development.

Further Minor Amendments have also been made to Policy INF9, Part 2, in particular to the criteria for assessing infrastructure sufficiency (new draft attached as an appendix) to include better signposting to clarify that an assessment needs to be undertaken.

The Local Plan Review process involved engagement with a range of utilities providers at every stage of the plan making process which helped to identify need and address capacity issues. The Council also actively engages with utilities providers for the purposes of their consultations when invited to do so.

In the case of TW the Council is aware that there are capacity problems (as highlighted in Policies SC1 and INF4 and actioned in Policy INF9) and
has participated in consultation to understand what infrastructure improvements and alterations will take place in Newham, hence the inclusion of projects in the IDP.

TW is preparing a plan to deliver a secure and sustainable supply of water from 2020 to 2100 and the Council has participated in consultation. LBN engaged with utilities providers at Regulation 19 to deliver a positively prepared plan, encompassing the concept of spatial planning. Minor modifications are set out in the Minor Amendments to the Proposed Submission document.

Overall, due to extensive engagement with utilities providers the Council has been in a position to prepare resilient policies that respond to future needs, in particular policies SC1, SC2 and SC3, SC4, INF4 and INF9.
(ii) Whether the policy stance on decentralised energy generation is sufficiently detailed (INF4.1.c)

Decentralised energy is taken to mean any power that is produced and distributed close to where it will be used, as opposed to taken from the national grid. As such, though INF4 part 1c has been highlighted, any policy within the Local Plan that pertains to energy generation (renewables, ‘locally available sources’, on-site CHP) or distribution via local networks is considered relevant. Given the cross-cutting nature of the Local Plan, detail is to be found from reading its policies in the round as opposed to in isolation. The Plan’s stance on this subject is summarised as follows:

S1 - The overarching spatial vision for the Borough sets the scene by stating that Newham will become more resilient and that infrastructure improvements will support / keep up with growth. Part 1e specifically references becoming ‘greener’ through ‘innovative approaches to energy requirements’ and use of sustainable technologies and management techniques.

SC1 - Promotes the importance of considering environmental resilience, recognising the strain that growth places on resources (1b); noting that energy solutions should not conflict with air quality objectives (1f.iii); and, significantly, establishing in its spatial strategy that proposals should ‘make best use of locally available energy sources’ (2d). The policy itself clarifies that SC2 and INF4 must be read to fully understand this requirement, with justification paragraph 6.153b explaining why it is considered important.

SC2 - The energy and zero carbon policy (intended to inform developers of uses other than utilities infrastructure itself), establishes in its spatial strategy that locally available energy might include natural or waste sources such as sunlight (harnessed through passive design and use of photovoltaics) or heat pumped from ground / air / water sources or ‘taken off’ from other uses (para 6.163b). It also reiterates that decentralised energy in the form of local networks should be a central component of growth (i.e. development) within the Arc of Opportunity (2a).

INF4 - This utilities infrastructure policy compliments the aims and priorities set out above by giving ‘in principle’ support to any reasonable development/expansion of heat networks and to innovative technologies that exploit local resources (1c and d are specifically not detail clauses). It further provides detail of how these principles of support will play out in practice in part 3 of the policy; energy sources should seek to connect to networks (3a), developments should allow for connection even where it is
not immediate (3c), networks should be developed in accordance with the GLA’s London Heat Network Manual (3d), and heat pump installations should adhere to relevant guidance (3e).

Spatial Policies – Policies S2 (2k), S3 (2l), S4 (2l), and S5 (2j) also bolster the Plan’s stance by highlighting that in Stratford & West Ham, the Royal Docks, Canning Town and Beckton, there are significant decentralised energy opportunities (either via existing networks, development of networks given the facilitating scale of growth expected, or via water source heat pumps given the significant assets of the three rivers and the docks).

Further detail on how the Plan’s stance on decentralised energy is to be understood and implemented is provided in the justification and implementation sections of a number of these policies. For example, INF4 supporting paragraphs 6.235b (‘embedded in the earliest stages of masterplanning’) or 6.235g (giving examples of the guidance referred to in policy point 3e).

During Regulation 19 consultation, representations that pertain to this subject were received. In short, some concern about the meaning of ‘locally available energy sources’ was expressed, as well as the view that development should support itself in terms of energy. The Council’s position is that when read in the round (as summarised above) it is clear that the plan already promotes ‘energy self-sufficiency’ as far as possible and that the meaning of ‘locally available’ can be understood. It is however noted that the wording ‘locally available’ could usefully reappear in the supporting text of SC2 and INF4 and currently does not; this is addressed by changes set out in the Post Submission Amendments Schedule (to SC2 paragraph 6.163b and INF4 paragraph 6.235c). A further modification (to policy clause 3d) adds a link back to SC2 from INF4.

It is noted that since drafting of the Local Plan Submission Version, the Local Heat Network LDO referred to in part 2b of policy INF4 (and in spatial policies S3, S4 and S5) has lapsed and will not be renewed. In light of this, modifications to remove these references are now set out in the Post Submission Amendments Schedule. The Plan still includes references to existing and planned networks via the London Heat Map, and identifies specific opportunities in the spatial policies and Strategic Site allocations.

The Local Plan promotes decentralised energy throughout its policies. Appearing in the over-arching spatial vision, spatial policies, and thematic policies, it is clear that the use of more sustainable and resilient forms of
energy is encouraged and that infrastructure to facilitate a move towards these forms will be supported. Detail is found in the policies and their supporting implementation and justification sections when read in full, the Plan specifically references other/existing guidance where relevant so that detail is likely to be as expert and consistent as possible (Environment Agency publications, GLA guidance etc.). The Council’s view is that the Plan’s approach is clear and justified, and that sufficient detail to enable effective implementation exists.
7.3 Green Infrastructure (GI) & the Blue Ribbon Network: Is the policy justified and effective, especially in relation to:

(i) Whether the policy effectively addresses the need to protect and enhance the GI (policy INF6.1.a); and

The effectiveness of the policy (as per the format of other policies within the plan) stems from its setting out in complementary parts; firstly Strategic Principles & Spatial Strategy (part 1 in this case), followed by related Design and technical criteria (part 2 in this case). Part 1 of INF6 sets out the overarching strategic approach to Green Infrastructure, identifying the designated land the policy’s protection applies to; the importance of multi-functionality (1b); and benefits of a ‘green grid’ approach in the planning of new GI (1c). Part 2 sets out further detail of how the strategic principles and spatial strategy will be achieved in practice, including a requirement to demonstrate no loss of functionality (including quantum where that is relevant to its function) (2a); the need to consider the cumulative impact of small scale changes (2a); and the relevance of other locally significant plans (i.e. those of the Lea Valley Regional Park) (2b). As such, while the policy is worded such that proposals that ‘address’ these requirements will be supported (in line with good practice advice regarding policies being worded positively rather than prohibitively), it is clear from the detail that resisting the loss of greenspace (amongst other things) is inherent to the protection it creates. As the designation incorporates various types of green infrastructure, and not just accessible green spaces, the policy must account for different scenarios, hence the clarification that ‘no loss of functionality’ includes ‘quantum where relevant to its function’.

What the policy means in practice is further explained (for the benefit of both developers, the public and planning officers themselves) in the implementation and justification sections that accompany it (along with intended monitoring indicators including INF-OP-10a). While all crucial elements of the strategic handling of GI and associated development management requirements are contained within the policy itself, these sections serve to secure its effectiveness. Examples of this include:

- The detail of the ‘green grid’ approach contained within paragraph 6.256c, i.e. that it involves new and enhanced spaces adding to the existing connectivity established along rail and river corridors, the Greenway and the chain of Metropolitan Open Land in the east of the borough.
- Paragraph 6.256e explaining that relevant stakeholders should be consulted in regard to proposed changes to GI, specifically what effect those changes might have on its overall functionality (not just quantum of space).
- The need to weigh increasing public access objectives to green infrastructure should be weighed against environmental protection objectives, as per paragraph 6.256d.

As per the cross-cutting nature of the plan as a whole, policy INF6 also links to other policies that will support or complement the implementation of its strategy and detail (as clarified by implementation paragraph
Examples include SP2 (Healthy Neighbourhoods), SP5 (Heritage and other Successful Place-making Assets), SC1 (Environmental Resilience), SC3 (Flood Risk and Drainage), SC4 (Biodiversity) and INF7 (Open Space and Outdoor Recreation). These policies address aspects of GI protection as relevant, for example the issue of off-site cumulative impacts on the Epping Forest SAC (SC4/SC5) or the drainage benefits of green space (SC3).

The policy has involved a substantive re-write of the existing green infrastructure policy to firstly reflect the diverse nature of green infrastructure in the borough, not all of which is formal parks or valued for the same reasons. Secondly it reflects the various means by which green infrastructure may be protected and enhanced in a constrained and intensifying urban area, acknowledging the particular threats (e.g. cumulative and off site impacts) and opportunities arising. This approach to Green Infrastructure was supported by residents’ comments which were received via engagement activities including Council Surveys, Newham Mayor’s Show and via elected representatives. Further information on this can be found on page 53 of the Biodiversity and Green Infrastructure section of the Sustainability, Climate Change and Associated Infrastructure Options Appraisal (SD06). Such opportunities range from incremental enhancement through small additions to the green grid or localised improvements to accessibility, to larger scale ‘enabling development’. Thus in some cases this will involve re-provision of green infrastructure where there is wider development opportunity (e.g. a Strategic Site) with this policy providing for safeguards in the assessment of resultant masterplanning and enhancement proposals. This is the reason for protecting functionality rather than absolute configurations and quantums in green space, while noting that in some case quantum may contribute to this functionality e.g. in relation to the space’s definition as a park of a particular status contributing to access to greenspace sufficiency (as per INF7).

Regional and national plans help to establish what is required in relation to the protection of Green Infrastructure: London Plan Policy 7.18 states that the loss of protected open spaces must be resisted (unless equivalent or better quality provision is made within the local catchment area), while the NPPF, at paragraph 114, states that Local Planning Authorities should plan positively for the creation, protection, enhancement and management of biodiversity and green infrastructure. The Council’s view is that policy INF6, as written, conforms to these positions.

To confirm the policy’s position that protection and enhancement of GI necessarily involves the preservation of its functionality (including quantum where material to its function) an addition to implementation wording was proposed as per the submitted Schedule of Minor Modifications (SD03) to clarify the following, at paragraph 6.256e: The policy sets out a general presumption of protection which means that loss of green and blue infrastructure will be resisted and adverse impacts mitigated. A cross-reference to the map that serves both INF6 and INF7 (pg. 337) was also added so that a particular space’s role in addressing
green space accessibility benchmarks can be understood. To further assist in an applicants understanding of the function of any part of designated GI, the Council has proposed a further addition to the same paragraph (as set out in the Post Submission Amendments Schedule) explaining that a GI database will be hosted on the Council’s website (allowing for updated results of continuous engagement work) and that the IDP will highlight known enhancement projects.
(ii) **Whether the policy provides an effective context for the remediation of gasholders and activation of MOL.**

Multiple disused or partially decommissioned gasholder sites are signposted in the plan, including Bromley-By-Bow (‘Twelvetrees’) gasholders in Spatial Policy S4 and Strategic Site allocations S10 and S11, and former Beckton gasworks in Spatial Policy S5 and Strategic Site allocation S01. While not specifically mentioned in the Plan (as it does not fall within an allocated site) there is also known to be a disused gasholder site on Metropolitan Open Land (MOL) in the east of the borough (within a site known as ‘Leigh Road’). Falling within Strategic Site allocations and, significantly, not on designated MOL, the scope for enabling development that will allow for the remediation of these first two examples is clear. As the scope for the remediation of a gasholder site on non-allocated land that is also designated MOL may be less clear, the remainder of this answer will focus on the Leigh Road site.

The policy framework within which the remediation of gasholder sites and activation of inaccessible MOL is promoted is summarised as follows:

**S1** – The overarching strategic framework for the borough establishes principals of Newham becoming ‘cleaner and greener’ and ‘maximising integration of green infrastructure’ (1e), as well as ‘realising the potential and making best use of Newham’s land (including) green space’ (1b). The policy’s spatial vision signposts the need to minimise the spatial impacts of infrastructure to ‘help secure compatibility with other uses’ (2f); the creation of ‘new and enhanced open spaces and walking and cycling routes (2g); and a shift away from industrial activity in some parts of the Lower Lea Valley and Royal Docks while ‘making best use of heritage and other assets’ (2d).

**SC1** – In line with the strategic principle that development should ameliorate past environmental degradation to enhance site potential and minimise future harm (1d), part 2b of the spatial strategy sets out that gasholder sites should be remediated for more beneficial use.

**INF6** – This policy identifies green infrastructure (including MOL) that should be protected and enhanced (1a), promotes maximising the ‘multiple roles and benefits’ of that GI (1b), and promotes a ‘green grid approach’ that adds to the connectivity established by (inter alia) MOL in the east of the borough (1c). Implementation text confirms that public use of GI is often a key component of its multiple roles and benefits, though is careful to note that increasing access should be weighed against the habitat concerns of (for example) SC4 ((para. 6.256d).

**INF4** – This policy further bolsters the plan’s stance by establishing that utilities infrastructure will ‘evolve to keep up with growth’, facilitating the ‘creation of new neighbourhoods and economic opportunities (2a). As part of that strategy, the decommissioning
and remediation of gasholder sites is promoted provided any necessary ongoing infrastructure function is maintained (iv). Paragraph 6.235 further notes that ‘doing nothing’ is not an option – the need for remediation is pressing.

INF7 – While not yet MOL, the Open Space and Outdoor Recreation policy establishes that the creation of the Lea River Park (including a significant new open space at the Twelvetrees Gasholders site, 2b) is intended to lead to new Metropolitan Open Land or achieve regional park status (1b). The spatial strategy also requires that the ‘green grid will become increasingly publically accessible’, identifying MOL in the east of the borough as a specific opportunity (2c).

Spatial Policies – As already mentioned above, examples of disused gasholders in the borough are signposted in relevant spatial policies and strategic site allocations. The spatial policies also promote the activation of MOL where relevant, for example in part 2.c.ii. of Urban Newham policy S6 (concerning East Ham where the Leigh Road site falls).

Significantly, an addition to the implementation wording of policy INF4 (as per the submitted Schedule of Minor Modifications, SD03) acknowledges that gasholder remediation is costly, but that viability methodologies (including those that determine the value of land) should factor this in (6.235i).

The Council’s review of SC2 following submission noted that more clarity could be set out in 2b to indicate that remediating gasholder sites for more beneficial uses should be in accordance with the aspirations of the plan, for the avoidance of doubt. The Post Submission Minor Amendments Schedule sets out this amendment.

It is clear from the above that the policy context that promotes the remediation of gasholder sites and improved accessibility of MOL is established throughout the Plan. Notwithstanding the fact that the Leigh Road site is not an allocation (and cannot be given its MOL status and a strong Mayoral stance against any erosion of MOL1), there are a range of policies (both in the Local Plan and wider development plan) that allow any proposal for the site to be considered on its merits. The Council further notes the potential relevance of wording within the draft London Plan (2017) that states ‘the principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria’ (8.3.2).

The Council’s view is that the Plan’s stance on these issues is set out sufficiently clearly and that, when read in the round, the policies are effective and establish deliverable objectives.

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1 This was previously covered in the Options Appraisal (SD06, page 54), explaining that the only situation in which MOL has been adjusted in Newham is in recognition of essential infrastructure needs at Beckton Sewage Treatment Works
7.4 Infrastructure Delivery: With reference to the Council’s Infrastructure Delivery Plan (IDP) and policy INF9:

(i) Do policy INF9 and the Infrastructure Delivery Plan (IDP) provide sufficient guidance for the successful implementation of the Plan?

Policy INF9 which forms part of the Submission Version is an amendment to Policy INF9 of Newham’s Core Strategy (Adopted January 2012). The revised policy as scoped at the Issues and Options stage (EB28A) provides a greater level of detail in light of the experience (and resultant established practice) of interrogating schemes against general criteria expressed elsewhere in the adopted plan (e.g. existing H1 and INF8) and associated S106 negotiations, against a backdrop of the evolved CIL regime and updates to the IDP and linkages with the plan.

The policy specifies that all development is required to demonstrate infrastructure sufficiency by undertaking the infrastructure sufficiency assessment at INF9: 2. Schemes subject to viability testing are now addressed and in such instances there is clear guidance on the three key priorities to be addressed in order to meet the objectives of the Plan. Amendments proposed at submission clarify that the weight given to each priority will vary on a site by site basis according to particular strategic and local needs reflected in for instance, the site allocation.

The policy also clarifies that affordable housing contributions and CIL payments are just two of the mechanisms in which infrastructure sufficiency is secured but are unlikely to be enough on their own, particularly in larger schemes. The technical criteria set out the benchmarks and considerations that will be used to make an assessment of infrastructure sufficiency in the round, given the strategic principles in the first part of the policy and other thematic policies it links to.

In the implementation of Policy INF9 an assessment of infrastructure needs is required. The Council has reviewed the Policy and suggested some further minor amendments to further clarify the policy, and explain how the approach to assessment of infrastructure sufficiency will be proportionate to the scale of the development proposed, with advice available through the Council’s established pre-app system. As per the principle of having a ‘living’ IDP, this has also been updated to reflect the latest information available and clarify its relationship to the Plan.

To summarise these changes achieve the following:

- General changes to enhance comprehension and clarity;
- Make it clear that an assessment is required to demonstrate infrastructure sufficiency;
- Highlight the availability and benefit of the Council’s pre-application service;
- Clarify infrastructure considerations for small sites and windfall sites; and
- Indicate that non-financial obligations may also be sought.
Overall, with these amendments, Policy INF9 in conjunction with the IDP and for more complex cases with pre-application advice, they provide a comprehensive guide to successful implementation of the Plan in respect of infrastructure sufficiency.

The revised Local Plan ensures that the IDP is clearly embedded within infrastructure policies notably INF9 as a material consideration concerning demonstration of ‘need’ and in terms of requiring developers to engage with the processes and infrastructure sufficiency issues highlighted within it in the course of their masterplanning, capacity testing and impact assessments. In turn, infrastructure providers and commissioners will also be encouraged to continue to engage with it in their strategic planning, given that the plans of most are extremely short term in comparison to the 15 year+ time horizon of the Local Plan, may use divergent population/growth assumptions, and seem to be prepared with little reference to the plans of other providers which may have cumulative consequences. The standard proforma for each infrastructure type helps to draw out the issues where there needs to be reconciliation, for instance, in the use of standard population projections that build in awareness of where most growth is targeted. It is notable however, that many infrastructure plans presently seem to be driven by the need for efficiency savings and financial sustainability rather being clear about any assumptions that make regarding growth, spatial and population changes.
(ii) Which schemes are critical to the successful implementation of the Plan? Are these schemes viable? Are there any show stoppers?

The IDP outlines the priorities for key infrastructure and the level of priority. The majority of infrastructure projects set out within the IDP are either ‘critical’ or ‘essential’, with a few projects classed as desirable. As expressed within the IDP ‘most infrastructure providers’/commissioners’ access to funding is such that they will focus on projects with the strongest business case, (typically linked to associated growth potential or legal obligations arising e.g. for school place provision) and may indeed deal with a ‘backlog of investment’. The IDP is however, also strongly inter-twined with the Investment Infrastructure Planning process being undertaken by the GLA and LBN for the Royal Docks Enterprise Zone/Opportunity Area.’

Schemes are costed at the relevant stage in their planning process according to established methodologies in that sector to ensure that the figures are genuine and realistic. Their viability as a proposition goes back to the point that they are seen to be necessary if project detail is worked up, and as such relevant stakeholders will work together to secure the necessary funding, land and other resources to make them a reality. Funding will variously include CIL and on and off-site planning contributions, as well as capital programmes, loans, funding bids (e.g. to the Housing Infrastructure Fund) and grant programmes (e.g. DoE Basic Need Funding). Various ways to use retained business rates receipts or future potential receipts in the Royal Docks Enterprise Zone are also being explored. Viability assessment testing of the Plan shows that development is viable with the levying of CIL and making other infrastructure contributions on or off site as well as meeting other policy requirements. As such Strategic Site allocations include requirements for various forms of on site critical infrastructure to meet needs arising from their development that they can provide through land/build costs and/or some element of funding. Policy INF9 provides for an assurance process that recognises the imperfect alignment of the Plan and all infrastructure planning timescales and will be used with resultant conditions and legal agreements amidst the broader partnership working referred to above to ensure that the pace of development is aligned with the necessary infrastructure provision.

The most critical schemes relate to increasing the capacity of the DLR and capacity upgrades at key interchanges notably Stratford, West Ham and Canning Town and Custom House. It is also evident that these need to be supported by significant investment in the attractiveness of active travel modes, notably connections in the Lea River Park area, Greenway, establishing the Healthy Streets Approach (namely delivery of quietways, pedestrian and cycle improvements and wayfinding) and improvements to the bus network (such as improved journey times and low emissions bus corridors).

Education capacity, healthcare estate modernisation, utilities and flood risk are also to be regarded as critical, though not all needs are yet fully scoped due to the iterative process of site capacity testing; options testing
and business planning; and ongoing strategic work by statutory bodies such as the EA. Particular areas of focus are Stratford and West Ham, Canning Town and Custom House and the Royal Docks.

The table below sets out the projects in the IDP identified to be ‘critical’ by spatial area, however it should be noted as per the above, that not all are yet scoped to project stage.

<table>
<thead>
<tr>
<th>Spatial Policy Area</th>
<th>Most Critical Projects (as identified by IDP and Spatial Policies) as at June 2018</th>
<th>Timing</th>
<th>Expected cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>S2 Stratford and West Ham</td>
<td>Transport</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Stratford Regional Station Stratford &amp; West Ham</td>
<td>Up to 2031</td>
<td>£10m+</td>
</tr>
<tr>
<td></td>
<td>Stratford Gyratory Stratford and West Ham</td>
<td>2017-19</td>
<td>£17.9m</td>
</tr>
<tr>
<td></td>
<td>DLR Core Capacity Improvements Stratford and West Ham</td>
<td>2022-24</td>
<td>£650m</td>
</tr>
<tr>
<td></td>
<td>Jubilee Line Upgrade (signalling)</td>
<td>2016-21/22</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Education</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Carpenters Primary Expansion</td>
<td>TBC</td>
<td>TBC</td>
</tr>
<tr>
<td></td>
<td>Colegrave Primary 1FE /2FE Expansion</td>
<td>TBC</td>
<td>TBC</td>
</tr>
<tr>
<td>S3 Royal Docks</td>
<td>Transport</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pontoon Dock Station Upgrade</td>
<td>2016-25</td>
<td>£13.4m</td>
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<tr>
<td></td>
<td>Pontoon Dock Footbridge</td>
<td>2016-21</td>
<td>£2.1m</td>
</tr>
<tr>
<td></td>
<td>Royal Albert Station Upgrade</td>
<td>2016-25</td>
<td>£20.4m</td>
</tr>
<tr>
<td></td>
<td>Thames Wharf New Station</td>
<td>2016-25</td>
<td>£29.8m</td>
</tr>
<tr>
<td></td>
<td>Royal Victoria Canopy Extensions</td>
<td>2016-25</td>
<td>£1.9m</td>
</tr>
<tr>
<td></td>
<td>Elizabeth Line Station In Station Improvements</td>
<td>2015-19</td>
<td>Approx. £10m</td>
</tr>
<tr>
<td></td>
<td>DLR Core Capacity Improvements</td>
<td>2022-24</td>
<td>£650m</td>
</tr>
<tr>
<td></td>
<td>DLR Station Management/ Rolling Stock S106 Contributions (LCY)</td>
<td>2017-2025</td>
<td>£4.925 m</td>
</tr>
<tr>
<td>S4 Canning Town and Custom House</td>
<td>Utilities</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Increase in capacity of the Silvertown Substation</td>
<td>2021-2023</td>
<td>£5.01m</td>
</tr>
<tr>
<td></td>
<td>Transport</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Custom House DLR Station Upgrade</td>
<td>2016-25</td>
<td>£15.8m</td>
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<tr>
<td></td>
<td>Canning Town Station Upgrades</td>
<td>2016-21</td>
<td>£12m</td>
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<tr>
<td></td>
<td>Canning Town Wayfinding + Second Lift</td>
<td>2016-21</td>
<td>£5m</td>
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<tr>
<td></td>
<td>DLR Core Capacity Improvements</td>
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<td></td>
<td>Green Infrastructure</td>
<td></td>
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<td></td>
<td>Limmo Riverside Path &amp; Park NIAS</td>
<td>Ongoing</td>
<td>TBC</td>
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<tr>
<td>S5 Beckton</td>
<td>Education</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Hallsville Primary - New Free School</td>
<td>2018/19</td>
<td>Not known</td>
</tr>
<tr>
<td>S6 Urban Newham</td>
<td>Transport</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Beckton Park Station Upgrade</td>
<td>2016-25</td>
<td>£4.7m</td>
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<tr>
<td></td>
<td>Gallions Reach Platform Extensions</td>
<td>2016-25</td>
<td>£8.2m</td>
</tr>
<tr>
<td></td>
<td>DLR Core Capacity Improvements</td>
<td>2022-24</td>
<td>£650m</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Education</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Odessa Primary &amp; St James Junior Expansion</td>
<td>By 2019/20</td>
<td>£5.555m</td>
</tr>
</tbody>
</table>
In addition to the above all areas are subject to the TfL Strategic Cycling Corridors project (2019-25 / £10m+ budget) and road projects relating to 'Keep Newham Moving' (2016-26 / £100m).

The detail set out in the Spatial Policies and Strategic Site Allocations, together with the infrastructure policies and IDP (through its frequent updates – at least annually) demonstrates that the Council has a clear indication of schemes critical to the implementation of the Plan, or mechanisms through which they will be drawn into the planning process going forward.
(iii) What is the relationship between the Plan and the Local Enterprise Partnerships (LEPs) in terms of investment priorities and the provision of critical infrastructure?

**LBN relationship with the LEP**

LBN does not have direct dialogue with the LEP due to the GLA’s strategic economic role, and the Mayor of London’s devolved responsibilities which include preparing the regional Economic Strategy: as such the GLA performs much of the functions that would elsewhere be undertaken by the LEP, and dialogue on strategic economic issues accordingly takes place with the GLA instead. Indeed, the LEP does not respond to borough-level consultation on Local Plan documents. Therefore, no response was received at Regulation 18 or 19 consultation. The LEP has been consulted as part of the IDP review and their response is as follows: ‘Due to the high number of consultation documents we receive, we are not always able to respond individually so if you do not hear from us again and are satisfied that your plan gives due regard to LEAP (the London Economic Action Partnership) priorities, we are content for you to confirm that you have cooperated with us as part of your assurance statement’. In doing so, the Plan takes the lead from the agencies working on infrastructure and investment planning on behalf of the Mayor, notably TfL, GLA Land and Property, and the relatively recently formed Royal Docks Team (which is joint with Newham) and overseen by the LEAP’s Royal Docks Enterprise Zone Programme Board.

The Duty to Co-operate Statement sets out the engagement and outcomes that have occurred in this respect as detailed further in Matter 1 statements. The below therefore focusses on the particular alignment of investment priorities and support for critical infrastructure projects on the Royal Docks and its Enterprise Zone.

**Investment Priorities**

The Mayor’s Economic Development Strategy for London – Draft (MEDSLD) was published in December 2017. It is a strategy to foster ‘good’ economic growth in London which seeks to deliver:

- **A fairer, more inclusive economy** – focussing on including better educational opportunities, well paid jobs and employment practices, a lower cost of living, better health and less poverty and inclusive and safe communities.

- **Creating the conditions for growth** – enhanced workspaces, enterprise zones, improved transport and infrastructure (major utilities including digital connectivity), innovation and improved skills, and encourages enterprise and entrepreneurship.

- **Supporting London’s sectors** – sectors that offer a fairer and sustainable future economy for London have been identified, they include:
  - advanced urban services (such as architects, engineers),
o cultural and creative industries;
o financial and business services;
o life sciences;
o tech and digital;
o tourism industries; and
o low carbon and environmental goods and services.

- **Delivering the Mayor’s vision** – by strengthening partnerships and making a case for devolution.

Much of the Royal Docks area, as acknowledged in the current and draft London Plan is an Enterprise Zone (EZ). The Royal Docks has a specific Spatial Policy (Policy S3) which sets out over-arching strategic principles and spatial strategy, highlighting the need for high value employment uses focused on the Royal Docks Enterprise Zone. In particular S3:1c places emphasis on encouraging the Royal Docks to perform a ‘growing economic role in the production, conference, tourism and leisure, and increasingly higher education, social enterprise life sciences and green industry sectors and incubation across a range of sectors including digital and creative’. The aim is to develop ‘a world class business centre and an international forum for the exchange of knowledge and ideas’. This interacts with the J (Jobs, Business and Skills) policies, notably J1 and J3 in promoting particular employment hubs and other opportunities, and attendance to the needs of a range of business types and sizes across the borough as whole, including the growth sectors identified in the MEDSLD, as well as a broader skills and employability agenda which the Mayor of London and LEAP are heavily involved in in their pursuit of more equitable growth.

**Critical Infrastructure provision**

Policy S3 (as echoed by policies INF4 & J1) also acknowledges the need for investment in infrastructure critical for employment and housing growth notably transport and utilities capacity (particularly electricity supply/transition) and broadband connectivity. In turn, at a site level, education, health, pedestrian and cycle links and connections to the district heating network are identified as important components of site allocations in this area and beyond, contributing to inclusive and equitable economy priorities. INF9 and the IDP as discussed elsewhere are also important policies/mechanisms for ensuring provision is aligned with development.

Therefore, policies in the Local Plan are supportive of the investment priorities and the provision of critical infrastructure identified as part of Mayoral economic strategy and Enterprise Zone planning and associated partnership working, both in the Royal Docks Enterprise Zone and across the borough as a whole.
(iv) Does the Plan provide the necessary strategic guidance to guide the preparation of the next Community Infrastructure Levy (CIL), including identifying the infrastructure gap which CIL would help to bridge?

The Plan and the IDP work in unison by identifying the borough’s infrastructure requirements insofar as these are known, with these relating back to the strategic priorities set out in Policy S1. The IDP provides an update of infrastructure projects and infrastructure planning processes and helps to inform the Plan strategy (this ensures infrastructure requirements are met by policies and site allocations) and demonstrates that the plan is positively prepared and infrastructure needs arising will be met. Costing for projects set out in the IDP have been scrutinised by the necessary agencies to ensure that the figures are genuine and realistic and whilst a revised funding gap has yet to be calculated due to significant ongoing work notably in the Royal Docks, the scale of need can be readily discerned.

Policy INF9 indicates that CIL yields are small relative to the infrastructure funding gap presented for examination of the CIL Charging Schedule in 2013 following the CIL Infrastructure Planning and Funding Gap Report (28 July 2012, Rev 3), prepared by BNP Paribas. The identified funding gap was circa £120 million, with a projected CIL income of £26.7m between 2011 and 2015. CIL contributions are monitored annually: with £5,403,091.92 raised between 2013 and 2017 it is evident that there is a significant shortfall even in the projected income from CIL. It is expected that infrastructure costs will have risen in recent years due to inflation (and other price rises) and an increasingly ambitious scale of development with greater needs arising, therefore the aggregate and residual funding gap is likely to be growing.

Plan viability testing has tested various CIL scenarios including an uplift on present rates and assumes the Mayoral CIL rates published in the Mayor of London MCIL2 Draft Charging Schedule (December 2017) is in effect and this should not prevent development coming forward (EB02 – Newham Local Plan and CIL Viability Assessment (2017)). However, as CIL receipts are small compared to the funding gap, and other calls on development viability (notably affordable housing) are also important in the Newham context, it should be noted that CIL will only ever play a minor funding role in the Newham infrastructure planning context. Funding from other sources is therefore actively pursued to plug the gap in cooperation with the GLA and TfL.
S3 Royal Docks

Objective

5.30 The Royal Docks will be developed as a World Class business destination within the knowledge economy, and a focus for investment on a world stage, building on opportunities presented by the Olympics. The area will develop a nationally significant niche in low carbon and high technology industries, and will have a significantly expanded visitor and tourist economy, becoming a thriving leisure destination for Londoners and visitors alike, and cross-river and local connectivity will be improved to enhance the links between the Royal Docks and the surrounding areas.

5.31 The Royal Docks will become a unique and high quality waterfront urban quarter; today’s fragmented residential development will become consolidated into a number of distinct neighbourhoods. The predominantly industrial nature of the docks will shift over the plan period to a more balanced and higher value employment offer, well-integrated with the existing and emerging neighbourhoods, which opens up the waterfront with increased access to the River Thames and dock water spaces.

Policy

Proposals that address the following over-arching strategic principles and spatial strategy will be supported:

1. Strategic Principles:

   a. The Royal Docks will become a unique and high quality waterfront mixed use urban quarter, realising the value of its many locational advantages and limited, plan-led, carefully Managed Release of employment land in combination with co-location, intensification and sensitive infill, and innovative responses to flood risk.

   b. Delivery of approximately at least 8404 new additional dwellings homes and significant numbers of the borough’s targeted jobs growth will add to existing employment and communities and create new neighbourhoods in the Royal Docks Community Forum Area. The majority of these will come forward on identified 7 Strategic Sites, acting together with those in neighbouring areas, with non-strategic infill and activation opportunities identified at scattered locations within the wider area as shown on the Proposals Map and included in Appendix 1. (For an explanation of indicative housing typologies referred to in relation to these sites, please see Policy H1 Implementation paragraph 6.116-6.118)

Sites:
S21 Silvertown Quays
Proposals which address, and where appropriate accord with, the following vision-based policies for the wider area will be supported:

c. The Royal Docks will continue to perform a growing economic role in the production, conference, tourism and leisure, and increasingly higher education, social enterprise life sciences and green industry sectors, and incubation across a range of sectors including digital and creative, focused on the Enterprise Zone, which will be a world class business centre and an international forum for the exchange of knowledge and ideas;

2. **Spatial Strategy:**

a. Today’s fragmented residential development will become consolidated into distinct but interconnected neighbourhoods, and benefiting from a network of new and enhanced green and open spaces and continuous waterfront access, and good access to stations, buses (including riverbuses) and an enhanced walking and cycling network. New neighbourhoods, at West Silvertown, Silvertown, North Woolwich, Royal Victoria Dock and Albert Basin, will each offer a range of quality community and social infrastructure including new schools, health care facilities, community meeting places and local retail and services, with further connections to facilities on the ExCeL estate and at Custom House/Freemasons local centre, and Canning Town, East Beckton, Beckton Riverside and Woolwich town centres;

b. New street-based local centres will be developed at Thames Wharf and West Silvertown focused around North Woolwich Road and the West Silvertown and Pontoon Dock DLR stations, and North Woolwich local centre will be enhanced in terms of the quality and diversity of offer (including public realm) and nearby well connected complementary uses, including an upgrading of public realm, infill and other new residential development and retail uses with all centres benefiting from pedestrian and cycle links to neighbouring residential areas, and public realm improvements to reduce the barrier effect of the road;

c. The sections of North Woolwich Road between Tidal Basin roundabout and North Woolwich Roundabout, and longer term, Albert Road between North Woolwich and Albert Island, will be reconfigured to provide high quality, active pedestrian environments at a human scale, and increased cycle and
public transport network accessibility, in line with Policies SP7, INF2 and having regard to Policies INF6 and INF7.

d. Industrial areas will re-vitalise in consolidated form at Thameside East and West, and in the Albert Island (benefiting from Enterprise Zone status) and St Marks LiLS, anchored by successful businesses committed to the area, and new wharf and boatyard facilities, and buffered by modern industrial, flexible business and warehouse buildings that are configured to provide the necessary transition to neighbouring residential environments, achieving waterside access, separation of industrial and residential traffic and making use of and river based transport, where possible, and market sensitive diversification of the accommodation offer, which will be further complemented by mixed use cultural and creative hubs around North Woolwich Station and in the Silvertown Arches LMUA.

Rationalisation of employment land to achieve considerably higher value employment uses and jobs density than currently exist, including a phased release of Strategic Industrial Locations (SIL) over the plan period (as set out in Policy J2);

e. Consolidation and/or relocation of the four safeguarded wharves in the Royal Docks (Thames, Peruvian, Manhattan, and Sunshine) at Central Thameside West on Peruvian and Royal Primrose Wharves will achieve subject to locational criteria set out in the in Paragraph 7.77 of the 2011 London Plan and there being no net loss of functionality or wharf capacity and integrate with surrounding uses with additional development conforming with the associated SIL designation and complementing the wharves, including through maintaining access to them;

f. A package of river crossings, accessible bridges over the docks to the ExCel Centre and over the rail corridor between London City airport and Connaught Riverside, new riverboat services, improvements to the DLR and bus services (which will have evolved to address [new] desired patterns of movement) and access to Crossrail services will to provide strategic and local access for residents and visitors;

g. London City Airport will continue to perform an important role in the area’s international business and visitor connectivity and as the focus to an employment hub with measures implemented to support the optimisation of existing capacity and further mitigation of its environmental impacts at London City Airport, including improvements to public transport access with any proposals for further growth at the airport to be considered in line with the latest Airports National Policy Statement, the London Plan and Policy INF1.

h. The area’s key character assets, namely the open water and remaining historic buildings and structures of the docks, river/dockside views and
access, and Victorian heritage of North Woolwich around the station, Woolwich Manor Way Area of Townscape Value, Lyle Park and Royal Victoria Gardens, will be re-valued and enhanced, whilst achieving appropriate mitigation of flood risk, ensuring that they form an integral part of the area’s future, with building heights decreasing with distance from Canning Town towards the east, in line with Policies SP5 and INF7.

i. Local energy generation and district heating will be typical encouraged throughout the area with major developments being required to link and/or add to existing networks in addition to the provision of significant new energy transmission and ICT infrastructure to meet business, residential and transport needs or demonstrate how the design makes provision for future connection;

j. In order to deliver the above vision-based spatial strategy, the following Strategic Sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:

S21 Silvertown Quays
S22 Minoco Wharf
S09 Silvertown Landing
S07 Central Thameside West
S20 Lyle Park West
S23 Connaught Riverside
S04 North Woolwich Gateway

The Council will not support the development of sites in a piecemeal way particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications should be accompanied by realistic phasing proposals.

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 plan should conform: 1. Strategic Principles; 2. Vision Based Spatial Strategy.
Updated Map
New DLR Station (passive provision) Safeguarding
New map: Thamside West Wharves Strategy
5.32 The Royal Docks extend from Royal Victoria Dock and West Silvertown at the western end, through King George V Dock and Royal Albert Dock, London City Airport to Albert Basin, Albert Island and North Woolwich to the east, connecting and providing a relationship between areas across several Community Neighbourhood Forum Areas. Almost half of the area is water. Much of the area is industrial, particularly south of the docks, with extensive areas of vacant or underused land. However, the Royal Docks also contain a number of key economic drivers in these areas and around, within Newham, including the ExCeL conference centre, Tate and Lyle, University of East London, London City Airport, and more recently the London Borough of Newham’s offices at Dockside. The Docks have benefited from hundreds of millions of pounds of £500m investment in recent years and the pace of change is becoming rapid, with new neighbourhoods emerging at Royal [Minoco] Wharf and an increase in planning applications coming forward on smaller sites, as well as infrastructure and social and economic regeneration projects underway partly under the auspices of the only Enterprise Zone in London. The Local Plan therefore needs to bring these opportunities together in a managed and coordinated way to maximise the long term benefits, acknowledging the opportunities for transformational regeneration, with potential to make a significant contribution to the borough’s objectives for providing new homes, jobs and services complementing and where relevant, spatially referencing the ongoing joint-working between in line with the agreed vision for the future role of the Royal Docks, which is being worked upon by the GLA and the Council on the Enterprise Zone’s Detailed Delivery Plan and its financing, which will be further recognised in the evolving IDP.

5.33 There are significant public land holdings within the Royal Docks providing opportunities for transformational regeneration, with potential to make a significant contribution to the borough’s objectives for providing new homes, jobs and services in line with the agreed vision for the future role of the Royal Docks.

5.34 The Vision for the Royal Docks forms part of a wider strategy to create a Green Enterprise District across East London along the north bank of the Thames.

5.35 In terms of design, some earlier development schemes were poorly integrated with each other and existing neighbourhoods, there is currently a lack of coherence to some recent development and the communities/neighbourhoods to the south of the Docks have lacked local facilities and defined Local Centres, as well as connections to nearby alternatives. The general quality of the urban environment continues to be a challenge with high levels of traffic, aircraft noise and heavy industrial activity, together with a lack of investment and legacy of poor post-war
design in some areas, is very poor, and some parts of the area are isolated from the rest of Newham. The area’s relatively dispersed historic assets, including the Millennium Mills and Silo D, Former St Mark's Church (Brick Lane Music Hall), and Victorian heritage of North Woolwich around the station and Woolwich Manor Way Area of Townscape Value, could also be better integrated and activated, and many form part of strategic allocations in the area that should help achieve this. Other important character assets include structures of the docks, river/dockside views and access, Lyle Park and Royal Victoria Gardens, as well as the more recent Thames Barrier Park.

5.36 With a proposed Crossrail station opening at Custom House by 2018, reconfigured bus routes, enhanced DLR services, reactivating wharf operations and in the longer term, public transport links to the east and further river crossings, wharf consolidation and riverbus services (East London Transit and DLR extension to Dagenham Dock), the strategic transport connections are improving. Two potential river crossings are currently safeguarded by the Secretary of State (see Key Diagram), although these are under review by the Mayor of London. Other transport improvements such as a re-location of the Woolwich Ferry to Beckton, cable car from Royal Victoria to the Greenwich Peninsula and new Thames Clipper moorings are also proposed, providing additional links to the wider area. However, at a local level, finer grain connections for walking and cycling are still poor for local residents both within the Docks and from the surrounding area, and need to be improved, addressing key dock and rail corridor barriers, as well as the quality and comfort of the pedestrian and cycling experience, riverside and dockside access. Achieving the transformation of North Woolwich Road and Albert Road to pedestrian and cycle friendly activity streets, including through the activation of Silvertown Arches LMUA as a cultural hub, will be key to improving the connectivity and quality of the local environment.

5.37 London City Airport is a major employer and a catalyst for investment within the area, supporting London’s international role, with its presence being consolidated by the City Airport Development Plan (CADP) development to help optimise its capacity, further mitigate impacts and improve public transport access. Further into the future, there could also be an opportunity to bring forward an additional Crossrail station at London City Airport, should impact tests be overcome but the operation of the airport has impacts on the local environment and also could constrain some types of development in the Public Safety Zone to the east and west of the runway. Any proposals for future expansion will need to be carefully considered in light of these impacts, and the objective to attract people to the new neighbourhoods being planned in the Docks (see Policy INF1). The London Plan (Policy 6.6) emphasises the importance of optimising existing airport capacity for example, improving access and other passenger facilities, and the Council supports this in line with the airport’s acknowledged economic role.
5.38 A number of wharves on Thameside are safeguarded in the London Plan (and by a Direction from the Secretary of State), protecting them from development which could prejudice their future use for transporting goods by river. However, the wharves are spaced out across the river frontage and the land is in many cases underused, as such it makes sense to consolidate, reactivate and relocate wharf facilities— at Central Thameside West, subject to no loss of functionality or wharf capacity, which would free up part of the river frontage for, and further enable, mixed use development at Lyle Park West and Thames Wharf. This would will need careful phasing, management and design on the part of these Strategic Site developments to ensure neighbourliness and transition between uses, ensuring the remaining SIL remains functional and, reflecting its regional economic role. The safeguarded wharf at Tate & Lyle’s Thames Refinery remains operational and is not affected by the consolidation strategy. A London-wide review of safeguarded wharves has been commissioned, and the report will be published as part of the New London Plan Review in 2017 2018.

5.39 Consolidation or relocation of wharf facilities would free up part of the river frontage for development. This could include residential, community or other employment uses. This would need careful management to ensure that residential areas can be compatible with the remaining industrial areas. A London-wide review of safeguarded wharves has been commissioned, and the draft report published in 2011.

5.40 Given the importance of the Royal Docks to the regeneration of Newham and development of London, and investment in strategic infrastructure capacity it is proposed to release a further part of Thameside West from its designation of Strategic Industrial Location at the eastern end to Lyle Park West and the western side of Silvertown Landing, adding to release already in train at Minoco Wharf. Similarly, partial managed release of SIL from Thameside East at the western side will allows for the delivery of a new riverside neighbourhood at Connaught Riverside, whilst sustaining the regional economic role of Thameside East, anchored by the Tate and Lyle sugar refinery. In addition release of Thames Wharf from the Strategic Industrial Location designation is also proposed. This release is subject to the ability to provide a viable, usable wharf on the adjacent Carlsberg Tetley site. The safeguarded wharf at Thames Wharf can be removed from wharf safeguarding if it can be relocated and satisfactorily accommodated on the adjacent Carlsberg Tetley site, whilst allowing for the proposed Silvertown tunnel and cable car, or alternatively, relocated/consolidated elsewhere in the Royal Docks, in either case there should be no loss of functionality or wharf capacity. Policy J2 sets out the proposed Strategic Industrial Location release in the borough in more detail.

5.40b Woolwich Ferry and the foot tunnel are an important gateways to the Royal Docks and Newham, and bringing together various smaller scale opportunity sites as part of North Woolwich Gateway Strategic Site provides an
opportunity to secure transformational change, including activating and enhancing heritage and character assets and deliver additional cultural, community and creative uses, focused around North Woolwich Station, to complement the local centre adjacent, as well as significant new SIL capacity, to complement that further West.

5.40c Waterside sites, together with the scale of development afford the opportunity to support more sustainable forms of energy generation and distribution, reducing the strain on the traditional grid, and to taking advantage of existing network feasibility work, and projects planned and emerging, in line with policy INF4.

Implementation

5.41 While the potential for transformation is huge, there is a need to take a co-ordinated, managed transition approach which considers the most appropriate locations for new and expanding neighbourhoods, to manage the change from the traditional ‘heavy’ industrial character of the past to a more efficient use of the land resources for employment uses, including emerging economic sectors such as wharves, modern warehousing and industry, research and technology, tourism, leisure and culture, media and service industries, and to ensure the Docks are better connected with the rest of the borough and beyond, as well as significantly improved local connectivity and permeability, walkability and cycling facilities. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.

5.42 The Council will undertake further feasibility and legal work with its partners including the PLA and GLA, including the development and implementation of an appropriate funding and co-ordinating mechanism to secure the release of the currently safeguarded Sunshine Manhattan Wharf in the Royal Docks, and Thames Wharf in adjacent Canning Town and Custom House, the wharves in the Royal Docks that are currently safeguarded, upon and their consolidation/ relocation within the borough Central Thameside West; PLA are a consultee for any proposal affecting these wharves. London Plan policies, and the Mayor’s Safeguarded Wharves Review when published, will also be relevant to assessment of proposals. In order to allow for the full range of river uses to continue, especially large sea-going vessels, PLA are also a consultee for any river crossing proposals.

5.43 The Council is only a modest landowner within the Royal Docks; however, there are other significant public sector land holdings in the area, predominantly the GLA, and the Council will work with other public sector agencies to assess the need for supporting infrastructure and where
appropriate manage site assembly and delivery.

5.44 Further guidance will be required through masterplanning and associated work (e.g. Conservation Area Appraisals) and/or Supplementary Planning Documents to aid comprehensive development and regeneration in line with the visions. Where appropriate, area and site specific policies (including additional non-strategic sites) will also be detailed further through subsequent DPDs. The Strategic Sites that will deliver this policy are: The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it, along with associated technical studies (including the Character Study, the Strategic Flood Risk Assessment, Employment Land Review, and Retail and Town Centre Study) and the IDP. The Local Heat Network LDO (2013) and London Heat Map provides further detail with regards to the opportunities of delivering decentralised energy in the Royal Docks. All these documents can be accessed on the Council’s website. Airport safeguarding information and mapping can also be viewed on the council’s GIS system.

Monitoring

5.44a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

S21 Silvertown Quays
Residential-led mixed-use with potential for leisure and hospitality and green industries including research and development, building on the visitor attraction cluster at the western end of the docks (ExCeL, Siemens building). New residential development on this site will form part of the wider neighbourhood at Silvertown, supported by local shopping and community uses (a new local centre) focused around North Woolwich Road, including use of space under the DLR viaduct. Leisure uses should relate to the water space, with clear pedestrian and cycle connections through to the new local centre and across North Woolwich Road. Public access to the dock edge should be provided. Indicative residential typology - medium density, medium family.

S22 Minoco Wharf
There lease of land designated as a Strategic Industrial Location at Thameside West up to the eastern boundary of Lyle Park, and west of Lyle Park adjacent to North Woolwich Road, (18 hectares) will assist in the development of a new neighbourhood at West Silvertown. A new local centre should address North Woolwich Road providing a focus to the new neighbourhood as a whole and provide connections to both DLR stations, and pedestrian and cycle links to Silvertown Quays. Development should

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1 GLA, London Heat Map
2 LB Newham, Local Plan development and review
3 LBN, GIS mapping
include pedestrian and cycle access to the river. Indicative residential typology—medium density, medium family.

Adjacent Sites

S08 Thames Wharf
Proposed release from Strategic Industrial Location (see Policy J2). There is scope to reconfigure the safeguarded wharf on the site to the adjacent site (Carlsberg-Tetley) or to remove the wharf safeguarding at Thames Wharf if a consolidated wharf can be delivered at Thameside West subject to there being no net loss of functionality or wharf capacity. If it can be demonstrated that either scheme can be delivered, this could provide the opportunity to develop new employment, leisure/tourism and residential uses grouped around a potential new DLR station where passive provision is in place, subject to addressing the constraints on the site, including the Silvertown Crossing safeguarding area, and the removal of the wharf safeguarding by the Secretary of State. Indicative residential typology—medium density, medium family.

The Council will work together with other public sector agencies and developers to further investigate proposals for relocating or consolidating the four individual safeguarded wharves at Thameside West, to facilitate a more efficient use of land, and support the growing neighbourhood at Silvertown. See Policies INF1 and J2 for details.

S19 Albert Basin
New housing around Albert Basin will consolidate existing residential development, with a new local centre focused around Gallions Reach DLR station, providing day-to-day shopping, health, education and community uses. North of Armada Way new development will be employment-led and consistent with Strategic Industrial Locations (SIL). Residential development to be focused around southern end of the site, with some B1 business space, building on links with UEL and Royal Albert North. Legible walking and cycling routes should be provided through the site from the DLR station to the waterfront. Indicative residential typology—medium density, medium family.

S28 Custom House/Freemasons
Intensified residential/commercial/business space, making use of Crossrail potential which will form the nucleus of a renewed and expanded local centre with improved physical and functional links to ExCeL, and open space linking to the proposed ‘Activity Street’ to the north-west, and through a series of open spaces to Cundy Park to the south-west. Indicative residential typology—medium to high density, medium family.

S30 Royal Victoria West
New residential, leisure and cultural uses will be supported at this gateway site to the Royal Docks. The Siemens building and cable car link to
Greenwich Peninsula are due to be completed in 2012 providing new visitor attractions. Public realm improvements, including an enhanced pedestrian and cycle link to Canning Town, and active water space, are key priorities in this location. Indicative residential typology—medium density, low family.

S31 Royal Albert North
This site straddles both Canning Town and Custom House and Beckton Community Forum Areas.
Promotion of business and education uses, building on the strengths of the University of East London and land availability for innovative high-tech manufacturing and research and development. A link will be created from Beckton Park, bringing the park into the dock and enhancing access for local residents to new employment and training opportunities.
S4 Canning Town and Custom House

Objective

5.45 Canning Town will undergo a comprehensive programme of regeneration and renewal, to provide an enhanced neighbourhood delivering new homes, with an expanded town centre and carefully-placed taller buildings at its heart. There will be an improvement in the quality of Custom House/Freemasons local centre, with an intensification of uses around the station, building on the opportunities offered by Crossrail. New connections will be created through the area, including two new streets, and the local environment, including open space, considerably enhanced.

5.46 The Cody Road employment area will be strengthened, including the definition of Strategic Industrial Location (SIL) boundaries to incorporate the Prologis Industrial Estate. There will be scope for other traditional employment areas on the fringes of Canning Town to diversify, including emerging business sectors and other supporting uses.

Policy

Proposals which address, and where appropriate accord with the following overarching strategic principles and vision-based spatial strategy will be supported:

1. Strategic Criteria:

a. Achieve an enhanced, integrated, mixed and balanced neighbourhood including new waterside quarters, with and an expanded successful town centre at its heart and secondary focuses and intensification at Thames Wharf, West Ham and Custom House/Freemasons Local Centres, together with strengthened employment areas.

Approximately 7,950 new additional dwellings will be developed in Canning Town and Custom House Community Forum. The majority of these will come forward on identified Strategic Sites as shown on the Proposals Map and included in Appendix 1. (For an explanation of indicative housing typologies referred to in relation to these sites, please see Policy H1 Implementation paragraph 6.116-6.118)

b. The area’s regionally-significant economic role will be reinforced through further development of the existing warehousing, engineering and green industry, and visitor economy, business and conference clusters with good access to the Strategic Road Network, complemented by town centre growth and change towards Major Centre status, and bolstered by the new Crossrail station.
c. Major new housing (approximately at least 15,608 additional units), jobs growth and infrastructure provision will be delivered through a comprehensive programme of regeneration and renewal and managed release of SIL and associated wharf consolidation primarily on 12 Strategic Sites, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through managed transition, activation and sensitive infill also being identifiable at locations within the wider area.

S08 Thames Wharf  
S11 Parcelforce  
S13 Manor Road  
S14 Canning Town Central  
S15 Canning Town East  
S16 Silvertown Way East  
S17 Silvertown Way West  
S18 Limmo  
S28 Custom House/ Freemasons  
S30 Royal Victoria West  
Adjacent Sites:  
S10 Abbey Mills  
Silvertown Landing

Proposals which address, and where appropriate accord with, the following vision-based policies for the wider area will be supported:

2. **Spatial Strategy:**

Unsatisfactory housing and other surplus sites in the area will be replaced and around 7,950 new additional with homes of a wider variety of sizes and tenures in line with Policies H1 and H2 in a series of well-connected, safe and sustainable neighbourhoods which have easy access to community infrastructure. Abbey Arms, Freemasons Road, and West Ham will be key Local Centre with further local shopping protected at Cundy Road. New and improved open spaces will be provided through the Lea River Park and other opportunities as they arise.

a. Canning Town town centre will be a revitalised, intensified and expanded, and re-oriented town centre, growing in status – marked by some of the tallest buildings in the borough - as well as physical extent, benefiting from a re-modelled high quality junction and public realm, a new foodstore south of the Barking Road, a modernised renewed market space, better links to the station and bus station, and a better quality and mix of shops and other uses including leisure and workspace that improve activation, trade draw and dwell time, and improved east-west links to the station interchange and to adjacent residential neighbourhoods, functioning will be a new heart for the area, as an employment hub and
broader focus for activity and facilities both during the day and into the evening. Variety and distinctiveness will be fostered by the range of uses in the centre; a mix of unit types and scales; and effective integration with the existing high street part of the town centre, surrounding neighbourhoods and heritage assets, including development of attractive gateway sites with complementary uses and settings and a careful distribution and composition of tall buildings that protect views and make appropriate transitions.

b. Custom House will become the primary gateway to south Newham and the Royal Docks with the opening of Crossrail. Custom House station will become the centre of an effective transport interchange that connects with Freemasons Local centre and through to the ExCeL Centre, London City Airport and beyond, supporting a renewal and expansion of the centre welcoming both local residents and visitors to ExCeL and other dockside destinations. As the main north-south connection, Freemasons Road will become a place where people choose to walk, cycle and use public transport as well as stop and rest. Development will be intensified in the vicinity of the most accessible locations (Canning Town and and Custom House and Royal Victoria stations,) making best use of land, including undergrounding of pylons should opportunities arise, whilst not contravening sustainable community and design quality objectives, achieving coherence and integration with other development in the area. Canning Town town centre will be a minor hub for some of the tallest buildings in the borough, contributing to its identity as a key town centre for the borough;

c. New local centres at and community uses focused around West Ham and Thames Wharf stations will become resource hubs for new neighbourhoods and surrounding areas, marked by new tall buildings and well-used by new and existing residents, local workers and others passing through the area, with visitors drawn into the sites, towards the rivers by attractive parkland routes and onward connections.

d. Elsewhere, Abbey Arms, will be a key Local Centre and resource hub, with further local shopping protected at Cundy Road, Fife Road and Western Gateway.

e. Two new streets will be created across the area: one residential in character, one more activity-based and including green infrastructure. These will provide important connections between the town centre, surrounding neighbourhoods, important and improving community facilities and open space, and the other key node of Freemasons/ Custom House.

f. Links will also be improved with surrounding areas including to the district centres at Bromley-by-Bow and East Beckton, to stations, the town centre from the south, the Lea River Park and Greenway, the docks and
ExCeL/Royal Victoria and Royal Albert employment hubs, and the Thames with new accessible bridges put in place and re-opened over rivers and other barriers, connect with neighbouring communities in Tower Hamlets amongst others, along the Leaway (see Canning Town and Custom House Inset map) facilitated by the release of Mayer Parry and Priors Wharves, at Ailsa Street, Poplar Reach, Oban Street, Leamouth, Customhouse, over the dock to Silvertown Quays, as well as through general increased pedestrian and cycling permeability and comfort, (notably along North Woolwich Road) interchange improvements, and bus routes that have evolved to address [new] desired patterns of movement better connections to the new local centre around West Ham station, new district centre at Bromley-by-Bow to the north and the Lee Valley Regional Park.

The public realm, environmental quality and overall standard of design will be considerably upgraded, ensuring everyone can enjoy the area’s offer in full, particularly on foot and by bike. As well as improvements to connectivity, making better use of the area’s public transport access, better design will bring safety and security, ease of navigation, mitigation of utilities infrastructure, and a revaluation of the area’s natural and heritage assets (notably Victorian buildings Barking Road, Bevan houses in Canning Town, and the Bow Creek Ecology Park);

g. Cody Road together with Prologis Industrial Estate will continue to be an important employment location, focused particularly on heavier industry, (include waste processing and engineering) warehousing and distribution, with Strategic Sites at Canning Town Riverside and Parcelforce, and the LMUA at Bidder Street managing the transition to residential to the north and south; Managed Release of SIL and the associated Safeguarded Wharf at Thames Wharf will occur in the context of wider industrial opportunities in the Royal Docks, allowing for re-location and re-provision/consolidation off site.

h. The dockside mixed use leisure, convention, recreation and business district focused around the ExCeL Centre, Crystal Building and Cable Car, will be a further employment hub, with a focus on consolidation and integration within the area, addressing deficiencies such as lack of green space, poor pedestrian environment along Seagull Lane, the cumulative impact of tall buildings, and the barrier effect of the Crossrail line and of long linear development, developing new links with the complementary evolving employment hub at Royal Albert.

i. LMUAs at Bidder Street, Silvertown Arches, Esk Road and Beeby Road and additional micro-opportunities to the east of Canning Town Centre, will complement and further diversify the employment offer moving towards lighter, cultural, creative and service uses more compatible with residential and other contexts; smaller scale industrial opportunities will also be available at Butchers Road LIL.
Outside of the Strategic Sites - which will see comprehensive development replacing underused employment land and lower quality or poorly laid out housing and commercial uses with a wider variety of sizes and tenures in a series of high quality, well-connected, safe and sustainable neighbourhoods which have easy access to employment and new and enhanced community facilities - residential hinterlands will undergo more gradual renewal brought about by the cumulative impact of small scale changes and character sensitive infill including public realm and smaller scale infrastructure improvements particularly focused on the Key Corridors of Barking Road, North Woolwich Road, Victoria Dock Road, Silvertown Way, Manor Road, Freemasons Road /New Barn Street/Butchers Road/Munday Road, Hermit Road/Grange Road/Upper Road, and Balaam Street.

New and improved open space connecting with the green grid and integrating and re-valuing heritage assets will be provided amidst large scale residential development and through the ongoing evolution of the Lea River Park linking the Queen Elizabeth Olympic Park to the Royal Docks and Thames and across to communities in Tower Hamlets, with continuous linear greenspace broadening out at Cody Dock and Royal Victoria West and into parks at Bow Creek Ecology park - which will be enhanced, and on the Limmo Peninsula and at the Bromley by Bow gasholders, which will be made publicly accessible and will make substantial contributions to district and local park deficits in the wider area.

Custom House station will connect with the existing Freemasons local centre to become a enhanced local centre, with an offer directed at and welcoming to both local residents and visitors to ExCeL and other dockside destinations;

Better links between the consolidating dockside mixed use leisure, convention, recreation and business district and the wider area will help spread the benefits of the New Economy, recognised around ExCeL as an employment hub;

Cody Road together with Prologis Industrial Estate will continue to be an important employment location, focused particularly on heavier industry, recognised as an employment hub and Strategic Industrial Location.

Local energy generation and district heating will be extended in the area with Major developments being required to enable linkage to networks; and

In order to deliver the above vision-based spatial strategy, the following Strategic Sites sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:
The Council will not support the development of sites in a piecemeal way particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications should be accompanied by realistic phasing proposals.

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 plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.
Canning Town and Custom House is an historic East End neighbourhood that has been in existence since the mid-1800s, when poor quality workers’ slum dwellings were built to support heavy industry around the Royal Victoria Dock. Following extensive war damage and waves of regeneration in the early 20th Century and post-war period, today’s Canning Town and Custom House is mainly a residential neighbourhood, with development including terraced houses, walk-up maisonette blocks and point tower blocks. It incorporates a district centre and important tube, DLR and bus connections at Canning Town station, as well as significant areas of industrial and commercial units around Cody Road and a strongly emerging visitor economy focused around the international conference and events centre, ExCeL.

Whilst the area has no Conservation Areas, fragments of important historic development are pepper-potted throughout the area. Examples include the Grade II listed churches of Roman Catholic Chapel of St Margaret, Memorial Baptist Church, and Chapel of St George and St Helena, Grade II listed pubs Fairbairn Hall and the Connaught Tavern, and seven Grade II listed gasholders at the former Bromley-by-Bow gasworks site in the north, and industrial heritage such as warehouses and cranes alongside Royal Victoria Dock. The Victorian Church of St Luke in Canning Town has a spectacular spire, visible from the 1930s Silvertown Way viaduct, (in itself notable for being the first ‘flyover’ in Britain) though it is surrounded on all sides by industrial development, post-war housing and contemporary flats. Parts of Barking Road in this area are also distinguished by a small number of buildings of local historic interest, forming the Barking Road (West) Area of Townscape Value that includes the former Canning Town library, one of a number of buildings established by John Passmore Edwards (a wealthy philanthropist) in the late 19th Century, and the adjacent Public Hall.

However, the area has declined in the 1970s and 80s, since its post-war reconstruction, its residents suffering from the demise of dock-related industry by the late 1970s and a legacy of poor urban design (including poor connectivity), poor quality, monotonous housing and intrusive infrastructure which create significant barriers and visual impacts. Today, while investment, redevelopment and other regeneration initiatives spanning over a decade have helped improve the outcomes for local residents, much of the area still falls within the top 10% most deprived areas in England and Wales, with a significant number of older, unemployed, and disabled residents, and little private housing. The need to turn this around, together with the area’s excellent potential given its existing and improving connections – with a Crossrail station proposed at Custom House, proximity to Canary Wharf and waterside sites – has been the impetus behind the £3.7 billion Canning Town

DCLG (2015), English indices of deprivation 2015
and Custom House Regeneration Programme, which has identified the scope for comprehensive redevelopment on a number of key sites to make the significant changes to the area that this ‘turnaround’ requires. Whilst this is in train, it is a long term project. For example, the Town Centre Study 2016 recognises that, with significant changes having taken place since 2010 and more occurring and planned, Canning Town town centre is still in transition. As such this requires a continued emphasis on curation and management of it as an evolving place, employment hub and town centre with Major centre potential. This includes fostering a range of uses, and unit types and scales, including affordable workspace and ensuring the quality and diversity of the offer is well anchored by uses that are likely to pervade, and contribute to an expanded trade draw, dwell time and activation into the evening as well as during the day.

5.49 However, the area’s spatial planning needs extend beyond the Canning Town and Custom House Regeneration Programme area (see Spatial Policies Map), to the Royal Docks and up the Lower Lea Valley to West Ham. The strategy for the wider area includes activation of the Lea River by delivering the Lea River Park vision, including through appropriately sized and designed green spaces, revaluation of heritage assets, new walking and cycling routes and new bridge links to address both its continuity and connectivity to adjacent neighbourhoods. The masterplanning of Strategic Sites at West Ham and Thames Wharf, (as well as those in between) have key roles to play in this vision, as well as providing new foci for the communities to be created around them at their respective stations via, at Thames Wharf, managed release of the SIL and transfer of wharf safeguarding to the proposed consolidated wharf at Central Thameside West. While Canning Town Riverside also includes a two safeguarded wharves, Mayer Parry and adjacent Priors, these have not been in operation for a long time and there are significant operational constraints that would need to be overcome to bring them back into use. Pending the GLA’s Safeguarded Wharfs Review, it is expected that these wharf will be released from safeguarding. In the northeast of the area, the Greenway provides important connections as part of the wider green grid to Stratford, Plaistow, East Ham and Beckton, and its enhancement and further connectivity are important strategic objectives. Elsewhere, LMUAs will also provide an important opportunity to diversify and intensify the range of local employment opportunities beyond the main industrial areas and smaller LILs.

5.49a There are also significant developments planned at Bromley-by-Bow, and a greater emphasis on residential development in the Tower Hamlets localities bordering the area, particularly at Leamouth Peninsula, Housing Zone at Poplar and Greenwich Peninsula, which may be mutually beneficial if appropriately integrated.

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5 LB Newham (2016), London Borough of Newham Town Centre & Retail Study Update 2016
Implementation

5.50 The Canning Town and Custom House Regeneration Programme will deliver the majority of new homes, mostly on publicly owned sites, including substantive Council and GLA owned sites, and the remainder will be delivered through a combination of large and medium sized schemes outside the programme area, though again with substantial public sector land ownership (notably by the GLA), together with other small sites in a mixture of ownerships. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council. The area's many and increasing benefits, notably the arrival of Crossrail and scope for a new DLR station at Thames Wharf, together with wharf consolidation elsewhere, planned public realm, transport interchange, walking and cycling and social infrastructure investment, changes to the town centre to future proof it, and a buoyant industrial market and visitor economy linked to ExCeL, should help provide continued development momentum.

5.51 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance and advisory information is also available in relation to the Lea River Park concerning the vision, design codes, and potential connectivity projects\(^3\), and in the Character Study, Town Centre and Retail Study, the Strategic Flood Risk Assessment, Employment Land Review and Infrastructure Delivery Plan. The Local Heat Network LDO (2013) and London Heat Map\(^4\) provide further detail with regards to the opportunities of delivering decentralised energy in Canning Town area. All these documents can be accessed on the Council’s website\(^5\). Airport safeguarding information and mapping can also be viewed on the council’s GIS system\(^6\). The Canning Town and Custom House Masterplan and Supplementary Planning Document widely consulted on and adopted in 2008, guide development and investment in the area towards a sustainable community vision, to be updated and supplemented as necessary. Open space projects are referred to in Policy INF6 and associated spatial designations in Appendix 1. Where appropriate, area and site specific policies (including additional nonstrategic sites) will also be detailed further through subsequent DPDs.

5.51a London Plan policies, and the Mayor’s Safeguarded Wharves Review when published, will also be relevant to assessment of proposals relating to the Mayor Parry Wharf, Priors Wharf and Thames Wharf. Consultation with the

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\(^3\) Lea River Park Constituent Authorities (2008), Lea River Park Primer, Design Manual, and Curatorial Approach
\(^4\) GLA, London Heat Map
\(^5\) LB Newham (2017), Local Plan development and review
\(^6\) LBN, GIS mapping
PLA is required in relation to proposals for Thames Wharf and any river crossings up to the PLA’s navigational limits at the A13.

5.52 Improvements to environmental quality will include a continuing commitment to pursue less intrusive infrastructure, subject to viability and established national protocols (e.g. the mitigation of, and/or the undergrounding of high voltage overhead transmission cables). The Strategic Sites that will deliver this policy are:

Monitoring

5.52a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

S08 Thames Wharf
Proposed release from Strategic Industrial Location (see Policy J2). There is scope to reconfigure the safeguarded wharf on the site to the adjacent site (Carlsberg-Tetley) or to remove the wharf safeguarding at Thames Wharf if a consolidated wharf can be delivered at Thameside West, subject to there being no net loss of functionality or wharf capacity. If it can be demonstrated that either scheme can be delivered, this could provide the opportunity to develop new employment, leisure/tourism and residential uses grouped around a potential new DLR station, where passive provision is in place, subject to addressing the constraints on the site, including the Silvertown Crossing safeguarding area, and the removal of the wharf safeguarding by the Secretary of State. Indicative residential typology—medium density, medium family.

The Council will work together with other public sector agencies and developers to further investigate proposals for relocating or consolidating the four individual safeguarded wharves at Thameside West, to facilitate a more efficient use of land and support the growing neighbourhood at Silvertown. See Policies INF1 and J2 for details.

S11 Parcelforce
Employment-led mixed use linked to Cody Road industrial area that contributes to the creation of a new local centre in the station vicinity and facilitation of a possible future link to S10 Abbey Mills. Site access improvements will be required, including a link to West Ham station. Indicative residential typology—medium density, medium family.

S13 Manor Road
Residential-led mixed use scheme incorporating open space with green grid links to Star Park; commercial frontage (including B1) to Barking Road section east of Manor Road which will be the only part of the site to remain in the town centre boundary, and business use alongside the railway. Indicative residential typology—medium density, medium family.
S14 Canning Town Central
Expanded District Centre abutting a transport hub, moving towards a Major Centre in composition and scale, within a revised boundary to comprise retail (to include anchor food store of up to 6,500 sq m net, and significant comparison floorspace – up to 25,000 sq m net) leisure and civic space making use of the more pleasant street environment created by the remodelling of the junction and public realm, residential, and community uses. Connections to the Activity Street to the south/south-east, and residential street to the east/north-east, and through to the station will be important, together with an integrated town centre that links with existing retail frontages and the market. Indicative residential typology – medium density, medium family.

S15 Canning Town East
Residential with supporting community uses, notably a school to the west, and other multi-use facilities easily accessible from the town centre to the east, and green space of at least the existing quantum, linking to the residential street abutting the street to the south. Connections also need to be made across the site between uses, avoiding blocking effects. Indicative residential typology – medium density, medium family.

S16 Silvertown Way East
Mixed use comprising residential and business use fronting Caxton Street North opposite existing units, and public open space within the urban structure making green grid connections to Keir Hardie recreation ground and dealing with the amenity impacts of traffic. Connections to be made with Activity Street to the north-east, north to the town centre and north-west to the station. Indicative residential typology – medium density, medium family.

S17 Silvertown Way West
Mixed use comprising residential, and business, with commercial units and higher density residential facing the street within the town centre boundary, and business uses extending to face units under arches in Peto Street North. Connectivity to the main town centre and the rest of Canning Town needs to be addressed, together with amenity impacts of traffic. Indicative residential typology – medium density, medium family.

S18 Limmo
Open space forming appropriate connections and terminus to Lea River Park, with enabling residential use should access and environmental constraints be overcome. Connections need to be made to Canning Town station/town centre and neighbourhoods, and to the Leamouth peninsula. Indicative residential typology – medium density, medium family.

S30 Royal Victoria West
New residential, leisure and cultural uses will be supported at this gateway.
site to the Royal Docks. The Siemens building and Cable Car link to Greenwich Peninsula are due to be completed in 2012, providing new visitor attractions. Public realm improvements, including an enhanced pedestrian and cycle link to Canning Town, and active water space are key priorities in this location. Indicative residential typology—medium density, low family.

S28 Custom House/Freemasons Road
Intensified residential and commercial/business space, making use of Crossrail potential which will form the nucleus of a renewed and expanded local centre with improved physical and functional links to ExCel, and open space linking to the proposed Activity Street to the north-west, and through a series of open spaces to Cundy Park to the south-west. Indicative residential typology—medium to high density, medium family.

S31 Royal Albert North
This site straddles both Canning Town & Custom House and Beckton Community Forum Areas. Promotion of business and education uses, building on the strengths of the University of East London and land availability for innovative high-tech manufacturing and research and development. A link will be created from Beckton Park, bringing the park into the Dock and enhancing access for local residents to new employment and training opportunities.

Adjacent Sites

S10 Abbey Mills
The site will be developed for a mix of residential and employment uses and contribute to the creation of a new local centre in the station vicinity. Site access improvements will be required including a link to West Ham Station. This mix may include an element of community uses (including faith based) of a scale which is proportionate and which does not dominate the overall mix of uses in respect of land take, scale and traffic generation, located either within the local centre or so as to be well connected with the local centre and the station. Site access improvements will be required including a link to West Ham Station and facilitation of a possible future link to S11 Parcelforce. Indicative residential typology—medium density, medium family.
S5 Beckton

Objective

5.53 With its suburban low-density houses and large areas of green and water space, Beckton is an excellent location for families. The area will become increasingly well-connected, building on the recent expansion of the DLR network to Stratford and efforts to reduce the barrier effects of the A13 and the area’s disconnected street pattern. Local shopping areas will strengthen to provide a greater diversity and range of local services, with a new local centre supporting new homes at Albert Basin. People will feel safer in the area’s parks as measures are taken to help to provide natural surveillance. Beckton Riverside and London Industrial Park will support the continuing shift of industrial activity eastwards in the borough to become a cohesive, safe and permeable industrial area and together with new employment development in the Royal Docks will help to raise people’s average incomes.

Policy

Proposals which address and where appropriate accord with the following overarching strategic principles and vision-based spatial strategy will be supported:

1. Strategic Criteria:

a. Deliver a new well-integrated new piece of city whilst accommodating significant transport depot and waste and utilities infrastructure needs, a new internationally oriented hi-tech, knowledge-intensive business district benefiting from Enterprise Zone status, and renewal and improvements to the existing residential and industrial areas, focusing on their strengths as a green, family-oriented neighbourhood and a regionally significant centre for green industry, engineering, warehousing and logistics.

b. In Major new housing (approximately at least 5278 units) and infrastructure provision and significant numbers of the borough’s targeted jobs growth will be delivered primarily on 4 Strategic Sites through partial Managed Release of SIL, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through Managed Intensification, and sensitive infill also being identifiable at locations within the wider area.

Approximately 1,600 new additional dwellings will be developed in Beckton Community Forum Area. The majority of these will come forward on identified Strategic Sites as shown on the Proposals Map and included in Appendix 1. For an explanation of indicative housing typologies referred to in relation to these sites, please see Policy H1 Implementation paragraph 6.116-6.118.
Proposals which address, and where appropriate accord with, the following vision-based policies for the wider area will be supported:

2. Spatial Strategy:

a. Beckton Riverside will provide a new hallmark mixed use area, building on the strengths of the riverside location, good strategic road network access, [further] scope to extend MOL, continuous riverside access and optimal pedestrian and cycling permeability, and the established retailer commitment to the location, as well as extensive infrastructure investment yielding new connections including river crossings and station(s) and accessible community facilities commensurate with the scale of development. Gallions Reach Shopping the retail Park will co-evolve and intensify over the plan period to become more like a Major town centre for the area focused around a transport hub, in the mix of shops and wider offer services provided, the variety of unit sizes, the connections with local residential areas—including new housing in vertical mixed use formats within it and public transport nodes, and reduction in the dominance of car parking, with its economic importance recognised as part of the East Beckton Employment Hub.

b. Other new residential development, community facilities and small scale business use and a local centre at the station will consolidate the new community developing around Albert Basin, ensuring it is safe, with good connections to East Beckton District Centre, neighbouring UEL and the new neighbourhoods and town centre at Beckton Riverside,—and convivial, continuous public space alongside the docks and river.

Around 1,600 New homes of a variety of sizes and tenures neighbourhoods will be developed in the area to the west of Royal Docks Road and south-west of the Thames Gateway Bridge safeguarding, around the at Albert Basin, ensuring that this New and other neighbourhoods are will be safe, well connected and sustainable, with also have easy access to community infrastructure, services, leisure uses and a diverse range of shops in East Beckton, North Woolwich, the UEL campus, and new local centres next to Gallions Reach Station. Isolated shops elsewhere in the area that fill in gaps in the network will also be protected;

c. Royal Albert North will become a new state-of-the-art business quarter of international importance for high-tech, knowledge and cultural driven industries, benefiting from enhanced DLR access connecting with Crossrail, proximity to UEL and the University Technical College, greengrid connections to openspace and continuous dockside routes.
d. The East Beckton District Centre will be consolidated at the eastern end close to public transport links, and become less island-based and inward-looking, with an improved public realm, and renewal of the convenience offer and a wider array of town centre uses, and better linkages between the precinct and other shops and services in the area, as well as local neighbourhoods; redevelopment of the adjacent Alpine Way retail park will enhance the centre’s vitality and viability ensuring it is more clearly the commercial and community hub for the area, and better manage its integration with the residential development to the east, and successfully manage the transition to SIL to the north.

e. London Industrial Park and Gemini Business Park will continue to act as a significant component of the borough’s industrial offer, reflecting emerging growth sectors notably warehousing and logistics and taking advantage of links to road and river transport and SIL protection requiring their appropriate buffering, whilst through better integration with neighbouring areas, improving their comfort, convenience and permeability for pedestrians and cyclists with onward connection to public transport links and the river; Strategic Sites and to some extent unallocated retail parks offer some potential to relieve pressure on SIL, through the development of modern workspace that is more compatible (than core SIL uses) with other uses.

In Gallions Reach the retail Park will evolve over the plan period to become more like a Major town centre in the mix of shops and services provided, the variety of unit sizes, the connections with local residential areas and public transport nodes, and reduction in the dominance of car parking, with its economic importance recognised as part of the East Beckton Employment Hub

f. The 1980/90s suburban estate, with its good access to large areas of green and water space, and community facilities, will continue to provide an excellent location for families, with enhanced and expanded schools and healthcare provision. The area will become increasingly well-connected and legible, through improvements to bus and DLR services and efforts to reduce the barrier effects of the A13, Royal Albert Way, Royal Docks Road and the area’s disconnected street pattern together with public realm and natural surveillance improvements, along these and Woolwich Manor Way and in the local parks, securing improved routes to the town centre and the other retail parks in the area, DLR stations, Greenway, and the riverside/dockside and employment areas in between.

Improvements will be made to the connectivity of existing streets and routes through the area, in particular between: the Savage Gardens and the Tollgate Road areas; the Tollgate Road area and Stansfeld Road; the Richard House Road area and Leyes Road and King George’s Avenue; East Beckton District Centre and the other retail parks in the area; across Beckton Park;
and between the residential area and the riverside/dockside and employment areas in between;

**g.** Links will also be improved with surrounding areas, with the extension of the DLR network and station capacity enhancements (including platform lengthening), and other new river crossings, and a reduction through design and masterplanning of to Dagenham Dock in the long term, and through the barrier effects of the surrounding roads, rivers, docks, railways, industrial areas and retail parks, the A13, and Royal Docks Road and being addressed to connect with neighbouring communities and employment in Barking and Dagenham, East Ham and the Royal Docks and across the River Thames.

**Beckton District Park will be made safer with an increase in natural surveillance from new development and improvements to local paths and alleyways that increase usage, with a new shared pedestrian and cycle connection between Beckton Park and the Royal Albert Dock via Beckton Park station. New public open space will be provided at Beckton Riverside, and within the Albert Basin development. Public access along the dock edge and improved walking and cycling connections to the Greenway into Beckton Park will be required;**

The public realm and overall standard of design will be considerably upgraded, ensuring everyone can enjoy the area’s offer in full, particularly on foot and by bike. As well as improvements to connectivity, better design will bring safety and security and enclosure, ease of navigation and improved community foci.

**h.** Heritage assets will be better recognised including gas workers’ cottages at Winsor Terrace, and remnants of dock-related buildings, whilst views from the Greenway, to and along the rivers, and to Shooters Hill will be enhanced;

**Supporting the shift of industrial activity from the Lower Lea Valley, higher value employment development will be sought for Beckton Riverside which can sit comfortably with the new residential community at Albert Basin, and contribute to the overall cohesion and permeability of the area, including access to the river;**

**London Industrial Park and Gemini Business Park will continue to act as a significant component of the borough’s industrial offer, reflecting emerging growth sectors and taking advantage of links to road and river transport.**

**i.** The area will continue to be important for utilities infrastructure, with ongoing investment in the capacity, efficiency and [on and off site] mitigation of environmental and spatial impact at the sewage treatment works, former gasworks, and DLR depot, ensuring that these adjoining overall development capacity including, in the immediate vicinity, is
maximised. Modern waste processing and recycling is also compatible with industrial permissions, and should make use of river transport where feasible;

Additional B1 employment floorspace will be created at Albert Basin, clustered to relate to the wider Royal Albert North employment hub incorporating the UEL campus and the Council’s Dockside offices, whilst contributing to improved connections and definition of the area;

j. Low carbon local energy generation and district heating will be typical throughout the area with major developments being required to provide for connection and/or add to existing networks in addition to the provision of significant new energy transmission and ICT infrastructure to meet business, residential and transport needs

k. In order to deliver the above vision-based spatial strategy, the following Strategic Sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:
   S19 Albert Basin
   S31 Royal Albert North
   S01 Beckton Riverside
   S02 Alpine Way

Sustainability and efficiency will be facilitated by the Thames Gateway Heat Network, a local heat network and associated centralised low carbon local energy generation within the area, to which major development will be expected to provide connections.

The Council will not support the development of sites in a piecemeal way particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications should be accompanied by realistic phasing proposals.

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 plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.
Reasoned Justification

5.54 Beckton is a large Community Forum area, but currently has a relatively low population density due to large extents of land being in retail, warehousing, utilities and industrial use, and a deliberate 1980s London Docklands Development Corporation policy of developing newly-drained land for low-rise, family-oriented housing. Flat topography allows for views through to south of the river and Shooters Hill from taller structures. The housing, built to the south of the A13 and north of the Royal Albert Dock, was constructed in four distinct small ‘communities’, around Savage Gardens, Winsor Terrace and Tollgate Road and to the west of Stansfeld Road, with only remnants of earlier development (e.g. Winsor Terrace and a few Dock-related buildings) remaining. A series of local distributor roads and culs-de-sac serve the houses and flats, and Beckton District Park provides a defining feature which separates three of the communities. A purpose-built District Centre was provided at East Beckton, anchored by a major superstore, whilst further out-of-town retail was subsequently developed in a series of retail parks, the largest being Gallions Reach.

5.55 Beckton suffers from a lack of connected streets and severance caused by the park, the A13 corridor and other barriers to the edge of the area including the extensive industrial and retail parks and utilities infrastructure, and the lack of natural surveillance of the district park. North-south pedestrian routes link residential areas with the Triangle Retail Park, but crucial east-west connections between residential areas and the major amenities of Gallions Retail Park and Showcase Cinema, and future access to the Roding and Thames riverfronts are lacking. Given its proximity to the Royal Docks, a lack of public access, use and connection to the dockside is also surprising.

5.56 The District Centre provides for little community focus, given that it is primarily based in an indoor precinct and surrounded by a large car park, with a poor relationship with Beckton DLR Station, and the area lacks any Local Centres, with only scattered isolated shops. Gallions Reach, whilst employing significant numbers of people, fails to perform the function of a local high street, and instead provides a wider sub-regional shopping function attracting predominantly car-borne customers. For these reasons, and given further new housing development at Albert Basin, a new local centre is proposed in the south, together with consolidation and improvements to the connection, integration and overall design of other retail provision in the area, which will benefit from Strategic Site development in their vicinity.

5.57 More broadly, the area has a high level of social rented housing, and lower than average household incomes, hence the continued importance of securing a housing mix and promoting economic development potential to the south and east, and links to it from the residential area.
5.58 Beckton has cemented its position as the borough’s premier industrial location, most recently with the Olympic relocations and investment by existing businesses at London Industrial Park, and development of Gemini Business Park. It is well served by the strategic road network which connects to the M25 via the A13 to the east, Canary Wharf and the City to the west and the A406/M11 to the north. As well as the well-established London Industrial Park, this area comprises 52 ha of former gasworks land, the redevelopment of which is provided for by a 1992 permission, and two phases of which are for B Class uses. Phase 2 is the Gemini Business Park which is already complete and the location of many Olympic relocations, with Phase 3 incorporating some 55,000 sq m of B Class floorspace awaiting implementation. The Council wishes to see this or a similar proposal implemented at Beckton Riverside to further reinforce this industrial location, given redevelopment of other industrial land elsewhere in the borough. Additionally, the development of Royal Albert North is bringing forward a new business district of international importance, diversifying the employment offer available and stimulating further growth and investment, with further opportunities to capitalise on the Enterprise Zone status and the location’s proximity to UEL and the University Technical College (UTC).

5.58a The recent decommissioning of the expansive gasworks provides a unique opportunity to deliver a new piece of city in conjunction with the redevelopment and remodelling of Gallions Reach retail park into a town centre to service the growing local population, as part of Beckton Riverside Strategic Site. Substantial constraints remain to be addressed, including contamination, Thames Gateway Bridge Safeguarding, DLR depot growth needs, poor PTAL and connectivity to neighbouring areas, opening up and delivering additional green spaces and riverside access. The delivery of the site will require careful coordination of private and public sector stakeholders, careful phasing in the expansion of the retail park to a town centre in order to retain a balanced town centre network, and timely delivery of extensive infrastructure, including new bus links, a new station, and bridging over the River Roding.

5.59 Beckton nonetheless continues to have a significant role as a utilities infrastructure provider for the region, with a major sewage treatment works serving a large part of London, desalination and power plants, waste processing facilities at Jenkins Lane and nearly 10 ha of land remaining in gas works operational use. The DLR depot providing for important strategic transport capacity. The sewage treatment works have undergone improvements recently to tackle odour issues, as part of the Lee Tunnel Project and Beckton Sewage Treatment Works Extension project and other investment continues to reinforce its strategic importance. These include the Thames Tideway Tunnel project, which is proposed to connect to Beckton Sewage Treatment Works by 2020 and a desalination plant. The sewage treatment works’ built form includes a visually dominant sludge-powered generator building and a number of large concrete sludge storage tanks.
Whilst these uses are not going to disappear, it is the inevitable consequence of land becoming more scarce and development moving east that such utilities should work harder to ensure their environmental impacts are compatible with closer neighbours, and land take is minimised (see 5.63). The plan also signals via INF3 and S01 Beckton Riverside Strategic Site allocation the need to review waste capacity planning going forward, in light of the New London Plan and evolving development context. Implementation para 5.63 below provides more detail.

5.60 Previous UDP designations for the area included four Major Opportunity Zones that have mostly failed to be realised, not least due to the considerable remediation of contamination from former industrial uses and landfill needed in this area, and issues with transport capacity. A shift in Council thinking toward an industrial hub in this location is therefore seen to be more deliverable, fitting well with the area’s strategic importance for infrastructure and the constraints this brings.

5.61 Partly as a consequence of the utilities works, and due to large sites awaiting development, the area contains large areas of open land that attract birds and other wildlife, meaning it has various Sites of Interest for Nature Conservation (SINCs), and Metropolitan Open Land designations. However, much of this has limited public access and use, with scope for this situation to be improved with additional green space and connectivity work being undertaken through the masterplanning of Strategic Sites and complementary enhancements of the Greenway. Given operational health and safety requirements which limit public access to sewage works land, and an extant permission for 4 ha of new open space adjacent to the river, it is proposed that the Metropolitan Open Land designation should be removed from operational land and extended to Beckton Riverside.

5.61a Existing energy plants, waste resources and waterside sites, together with the scale of development afford the opportunity to support more sustainable forms of energy generation and distribution, reducing the strain on the traditional grid, and taking advantage of existing network feasibility work, and projects planned and emerging, in line with policy INF4.

Implementation

5.62 Delivery of most of the 1,600 dwellings the spatial vision for Beckton will be through the development of the Strategic Sites at Albert Basin, which is largely including land in public ownership at Albert Basin. The large Strategic Site at Beckton Riverside will require joint working with TFL on developing options for DLR extensions and a new station, DLR depot and river crossings; and with ELWA constituent boroughs on review of the Joint Waste Plan (see INF3). The Council is also a significant landowner in Beckton and will make best use of its property assets to support the Core Strategy Local Plan objectives for Beckton. Whilst an approximate housing delivery has been
calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that development opportunities here mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.

5.63 Other works, including sewage treatment works expansion and mitigation are the responsibility of statutory undertakers, whilst employment and open space development at East Beckton is provided by extant planning permission. Spatial designations support this prioritisation to the east of Royal Docks Road, with new adjacent development subject to Agent of Change principles set out in policy SP8, J1 and J2. Reducing spatial impacts of utilities and transport infrastructure more broadly will involve use of innovative technologies and formats, including provision for decking and over-development where appropriate.

5.64 To aid comprehensive development and regeneration in line with the visions, the Council will produce further, and update, Supplementary Planning Documents—covering significant areas of change—incorporating masterplanning and associated work (e.g. Conservation Area Appraisals). Where appropriate, area and site specific policies (including additional non-strategic sites) will also be detailed further through subsequent DPDs. The Strategic Sites that will deliver this policy are: The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance is available as part of the technical evidence base that supports these studies including the Town Centre and Retail Study, Strategic Flood Risk Assessment, Employment Land Review, Character Study and the IDP. The Local Heat Network LDO (2013) and London Heat Map provide further detail with regards to the opportunities of delivering decentralised energy [connections] in Beckton. All these documents can be accessed on the Council’s website. Airport safeguarding information and mapping can also be viewed on the council’s GIS system.

Monitoring

5.64a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

S19 Albert Basin

New housing around Albert Dock Basin will consolidate existing residential development, with a new local centre focused around Gallions Reach DLR station, providing day-to-day shopping, health, education and community

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1 GLA, London Heat Map
2 LB Newham, Local Plan development and review
3 LBN, GIS mapping
uses. North of Armada Way new development will be employment-led and consistent with Strategic Industrial Locations (SIL). Residential development will be focused around the southern end of the site, with some B1 business space, building on links with UEL and Royal Albert North. Legible walking and cycling routes should be provided through the site from the DLR station to the waterfront. Indicative residential typology – medium density medium family.

**S31 Royal Albert North**  
This site straddles both Canning Town & Custom House and Beckton Community Forum Areas. Promotion of business and education uses, building on the strengths of the University of East London and land availability for innovative high-tech manufacturing and research and development. A link will be created from Beckton Park, bringing the park into the Dock and enhancing access for local residents to new employment and training opportunities.

**Adjacent Sites**

**S28 Custom House/Freemasons**  
Intensified residential-commercial/business space, making use of Crossrail potential which will form the nucleus of a renewed and expanded local centre with improved physical and functional links to ExCeL, and open space, linking to the proposed Activity Street to the north-west, and through a series of open spaces to Cundy Park to the south-west. Indicative residential typology – medium to high density/medium family housing.
SC2 - Energy & Zero Carbon

Objective

6.161 Newham will be transformed into a low carbon borough by minimising the demand for energy in the built environment and by switching to renewable and low carbon sources.

Policy

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

1. Strategic Principles:
   a. All development will minimise and reduce carbon emissions by following the lean, clean, green energy hierarchy; all major development will meet London Plan zero carbon targets.
   b. Energy planning should contribute to the Council’s Resilience agenda in relation to costs and service level in the ongoing provision of energy.

2. Spatial Strategy:
   a. The development and expansion of decentralised energy networks (including low-carbon generation, storage and transmission infrastructure) will be a central component of the scale of growth within the Arc of Opportunity.
   b. Development should be configured to maximise the use of natural and waste energy sources including sunlight/daylight and (where feasible) ground / air / water / waste heat, where otherwise acceptable in terms of environmental impacts.

3. Design and technical criteria:
   a. All development is encouraged to incorporate smart meter technology that allows occupants to monitor and manage their energy usage. Major development will be required to commit to carrying out post-construction audits demonstrating compliance with CO2 reduction targets and incorporate smart meters that deliver monitoring data to the Local Authority for a minimum period of 3 years post-occupation.
   b. Statements setting out how development complies with the above strategic principles and spatial strategy should be provided; all Major development should be accompanied by an Energy Strategy/Assessment that:
      i. Conforms to latest GLA guidance (currently Energy Planning – March 2016) (currently requirements and guidance concerning Zero Carbon;
      ii. prioritises connection to heat networks (where they exist or planned development is known) and confirms appropriate mechanisms will be put in place.

1 https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0
to ensure end customers are protected in respect of the price of energy and level of service provided;

iii. provides for connection to heat networks in future where connection is not made prior to occupation (including detail of any required retrofitting)

iv. demonstrates compliance with air quality standards, including the emissions standards for renewable and low-carbon plant set out in London Plan guidance; and

v. confirms that the risks of overheating have been addressed through the design of the development, as per policy SC1.

c. Developments connecting to heat networks will provide evidence of ongoing management mechanisms, ensuring end customers are protected in respect of the price of energy and level of service.

Carbon emissions from new and existing development will be reduced by the following measures:

1. Requiring that all new residential development is built in line with the London Plan and Building Regulations to reach zero carbon by 2016 (or any subsequently adopted national standard on energy and low-carbon design);

2. Requiring that all new non-residential development is built in line with the London Plan and Building Regulations to reach zero carbon by 2019 (or any subsequently adopted national standard on energy and low-carbon design);

3. Connections to, or provision for connection to, decentralised heat networks (See Policy INF4);

4. Incorporating on site renewable energy generation in line with the requirements of the London Plan, and other innovative technologies to reduce carbon emissions; and

5. Encouraging the take-up of opportunities to reduce carbon emissions from existing homes and other buildings through retrofitting subject to the sensitivities identified in Policy SP5.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform:

1. Strategic Principles

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2 Appendix 7 of the April 2014 Sustainable Design and Construction SPG or subsequent updates
Addressing energy efficiency and the use of clean and renewable energy sources has benefits in relation to fuel poverty, local energy sufficiency and security, and the built environment—and in particular, the buildings we use to live and work in—are major contributors to greenhouse gas emissions. The regeneration of Newham presents an opportunity to embed energy production and transmission within new development whilst also better addressing environmental impacts like resource depletion and air quality degradation.

The scale of growth in Newham presents an opportunity to develop that reduces its contribution to climate change through reduced carbon emissions. Heat networks were seen to be a particular opportunity by the public sector and the third sector in consultation on the Core Strategy. This policy contributes to resilience and good growth objectives by promoting energy efficiency (thereby reducing costly fuel use) and supporting local energy generation that is designed and managed according to local objectives including reliability, cost and minimising the harmful air quality and global warming impacts of certain energy generation technologies (objectives 1, 2 and 3).

Low carbon development is increasingly central to national and regional planning policy, the principles, spatial strategy, and design and technical criteria above transfer drivers to the local context. Efficient, affordable, reliable and environmentally beneficial energy solutions should be seen as central and beneficial to development, as opposed to additional burdens upon developers; indeed viability testing has shown that costs are readily absorbable when factored in at the design, which given the Pan-London approach, is increasingly typical. and Newham’s policy on energy implements these policies at the local level. The London Plan 2011 (Policy 5.2) will phase in zero carbon development through step changes in line with changes to the Building Regulations. In addition, these step changes are reflected in the energy standards required to achieve the higher levels of the Code for Sustainable Homes.

In order to deliver the Zero Carbon targets of the London Plan, all development, including that which modifies existing buildings rather than being new-build, must play its part, and ensure that the performance is sustained. To this end, expectations around monitoring and the demonstration of compliance are set out for major development schemes.

Localised energy solutions will contribute to the overall resilience of Newham, bearing in mind the requirements of policy INF4 in relation to infrastructure sufficiency. Given the substantial natural or waste resources presented by water source heat, sunlight/daylight, and ground and air heat, and the potential for heat network development in growth areas across the Arc of Opportunity, the spatial strategy identifies locally available energy sources, seeking to ensure developers exploit these resources / opportunities rather than ignore them in favour of easier, cheaper, and more traditional modes. However, this should not be at the expense of other environmental impacts on waterbodies for instance, (as per SC4) or in terms of overheating caused (see Policy SC1).
Implementation

6.163c The energy hierarchy is set out by London Plan\textsuperscript{3} with implementation advice provided by the Sustainable Design & Construction SPG. All scales of development are expected to follow these principles, with responses scaled as appropriate.

6.163d Carbon reductions are expected to be delivered on-site as far as possible, shortfall will only be accepted where it can be demonstrated that the reduction targets are impossible to meet in full on site. In such cases, offset-setting contributions will be expected in line with London Plan requirements.

6.163e All development should try to connect to heat networks given their efficiency, resilience, and environmental benefits. Reference should be made to the London Heat Map (showing where networks exist or are proposed) as well as Newham’s Local Heat Network Local Development Order. To demonstrate compliance with policy clause 1b and 3c, developers are encouraged to make use of recognised industry standards such as the Heat Trust scheme\textsuperscript{4} or CIBSE’s UK Code of Practice\textsuperscript{5}. Schemes involving energy generation should demonstrate how the benefits are passed on to end users.

6.163f Where heat pumps and other energy generation or transfer technologies are employed, refer to the further requirements of INF4. Point 2b above means that use of innovative technologies will only be approved where environmental impacts can be shown to be acceptable (e.g. the effects water source heat pumps may have on the Blue Ribbon Network through or energy solutions that demonstrate no degradation of air quality).

\textsuperscript{3} Policy 5.2
\textsuperscript{4} http://heattrust.org/index.php/the-scheme
\textsuperscript{5} https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q200000090MVHAA2
6.163 Guidance on how smart meter data should be reported to the Council will be produced. Options are likely to include use of an approved software platform or manual provision of data in an agreed format, either way secured through planning obligation.

6.164 Carbon emissions should be reduced by using less energy, supplying that energy efficiently, and where possible, using renewable or low carbon energy. This hierarchy requires innovative design responses.

6.165 Reducing carbon emissions in Urban Newham – where much of the Borough’s existing building stock is expected to be maintained – will require a more proactive approach from the Council and others such as property owners, supported by specialist agencies such as English Heritage. In these locations, retrofitting as part of ongoing maintenance and refurbishments and ensuring that alterations and additions adhere to the requirements of low carbon developments will be integral to achieving this policy’s objective.

6.166 Development proposals should demonstrate that they have met energy requirements set out in the London Plan 2011 and Building Regulations (or any subsequently adopted national standard on energy and low carbon design).

6.167 Further policy on energy and low carbon design will be set out in the Detailed Sites and Policies DPD and detailed guidance will be provided in Supplementary Planning Documents.

Monitoring

6.167a The monitoring framework includes performance indicators upon which the relevance and efficacy of the policy will be assessed. Outputs relate to the achievement of Zero Carbon targets at design stage while outcomes, given the range of information sources available, will include monitoring of actual carbon reduction post-occupation and EPC ratings. The requirement of this policy to include automatic reporting from smart meters will improve the Council’s ability to monitor the success of the policy.

Indicators

- SP-OP6 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny].
- SC-OP-X Energy & Zero Carbon
  - i. Zero carbon at design stage in relevant consents (no specific target, should be increasing)
  - ii. Smart meter technology in consents (no specific target, should be increasing)
- SC-OUT-X Carbon reduction
  - i) Achievement of targeted carbon reduction in new-builds (target: in line with reduction committed to or more)
  - ii) Environmental Impact Rating (based on CO2 emissions) of newly lodged EPCs compared to London and national averages, (no specific target should be improving)
  - iii) Energy Efficiency Rating (based of fuel costs) of newly lodged EPCs compared to London and national averages, (no specific target, should be improving)
INF3 - Waste and Recycling

Objective

6.225 To manage Newham’s waste in accordance with the waste apportionment set out in the London Plan 2011, and the aim of moving from landfill to waste minimisation, moving up the waste hierarchy.

Policy

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

1. Strategic Principles:
   a. The management of waste and development of waste facilities will:
      i. follow the waste hierarchy (prioritising reduction, reuse, recycling, and energy recovery before final disposal);
      ii. prioritise rail and water transport over use of the principal road network;
      iii. observe the proximity principle (dealing with waste as close to its source as possible); and
      iv. minimise spatial impacts.

Development proposals for waste management facilities must support movement up the waste hierarchy as follows:

1. Reduce
2. Reuse
3. Recycle
4. Energy recovery
5. Disposal

Development proposals for waste management facilities must support the transport hierarchy as follows:

1. Rail or waterway transport of waste materials;
2. Road transport making use of suitable principal road routes.

b. Compliance with the East London Waste Plan\(^1\) while recognising any updates to the strategic framework of the London Plan.

The Joint Waste Development Plan Document (JWDPD) for the East London Waste Authority Boroughs sets out how the borough will meet its apportionment of waste to be managed as set out in the London Plan; the amount of waste to be managed by the Boroughs of Barking and Dagenham, Havering, Newham and Redbridge; the range and type of facilities needed to manage the waste, and suitable locations for these facilities including for the processing of construction, excavation and demolition wastes and hazardous waste.

\(^1\) Currently the 2012 Joint Waste Development Plan for the East London Waste Authority Boroughs
2. **Spatial Strategy:**

a. Schedule 1 safeguarded sites will be protected and prioritised for new or expanding waste facilities for which there is a proven local need, followed by Strategic Industrial Locations as far as possible. Other locations may prove suitable where acceptable mitigation of impacts can be delivered in line with other development plan policies (specifically SP3, SP8 and SC5).

b. Development incorporating the Schedule 2 safeguarded site at Beckton Riverside will include a waste facility with capacity to meet strategic waste needs or unless it is demonstrated that there is no longer a need for a waste use for such a facility in that location (either through proof of updated evidence concerning strategic no need or the availability and suitability of an alternative site via an updated Joint Waste Plan or submission of equivalent robust evidence).

c. Other waste sites will be protected as per Managed Release, transition and intensification specifications set out in J2 and where relevant, spatial policies.

Licensed operational sites are safeguarded in Schedule 1 of the JWDPD as follows:

2. Bywaters Materials Recovery Facility, Twelvetrees Crescent, Bow;
3. The Remet Company Limited, Metal Recycling, Cody Road, Canning Town;

In Schedule 2, a 7 ha site has been allocated at Beckton Riverside for a medium-sized waste management site to manage the level of additional waste apportioned to Newham in the London Plan.

Schedule 1 and 2 sites are shown on the Proposals Map.

The Environment Agency licenses a further 18 operational sites in Newham, all of which are safeguarded by London Plan Policy 5.17 and will be reviewed in the Detailed Sites and Policies DPD. The sites do not contribute towards the London Plan waste apportionment as their function lies outside of the definition of the apportionment (see Glossary); however, the London Plan requires that if for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that meets the maximum throughput that the site could have achieved.

Proposals for alternative/additional sites will need to demonstrate that they are more suitable than the Beckton Riverside site for the type of waste or waste treatment process or the Beckton Riverside site has been developed and further waste management facilities are needed, and are in suitable locations, bearing in mind the requirements of the East London Joint Waste Plan and other policies in the Core Strategy. Proposals for additional sites will be considered within Strategic Industrial Locations as listed in Policy J2.

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*Set out in the Joint Waste Development Plan for the East London Waste Authority Boroughs*
3. **Design and technical criteria:**

a. As per policy SC5, all waste facilities should be fully enclosed or provide an equivalent level of environmental protection with respect to air emissions.

b. **Development should** ensure on-site handling and storage can meet the needs of the development and local collection arrangements without amenity impacts for occupiers or neighbours; this includes future-proofing through the facilitation of tri-separation and collection. **Where feasible appropriate providing innovative approaches to sustainable waste management that support the implementation of policy in line with SP8 should be provided;**

c. Major development proposals should be accompanied by Site Waste Management Plans setting out how the requirements of this policy are met.

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.

In accordance with the waste hierarchy (prevention, re-use, recycling, energy recovery, and disposal) and policies SP8, SC1 and W18.

In dealing with planning applications, the Council will, through planning conditions, seek to ensure that rigorous controls are placed upon the transfer, treatment, storage or disposal of special, hazardous, chemical and radioactive wastes or materials and on any land use that involves matters covered by Schedule 1 of the Environmental Protection (Prescribed Processes and Substances) (Amendment) Regulations 1994.

Development proposals for waste management facilities must support the transport hierarchy as follows:
1. Rail or waterway transport of waste materials;
2. Road transport making use of suitable principal road routes.

The Council may, through planning conditions, seek to define the proportion of waste carried by rail or water and restrict routes that may be taken by heavy vehicles.

Development proposals for industrial, commercial and residential developments must demonstrate arrangements for on-site waste management, including the location and appropriate size of storage facilities and vehicular access.

The Council will work with Thames Water and other stakeholders to ensure the timely provision of appropriate new sewage and sludge treatment facilities at Beckton Sewage Treatment Works to meet future demand.
The Council will work with Thames Water and other stakeholders to reduce or eliminate sewer flooding and supports proposals for additional storage and pipeline capacity in the proposed Thames Tideway Tunnel and Lea Tunnel that will reduce incidences of stormwater overflow into the Thames and Lea river system.

The Council will support the provision of infrastructure to address land contamination and improve soil quality, including treatment centres and soil hospitals. The provision of such infrastructure would support the sustainable remediation of contaminated land in the borough in line with Policies SP2 and SC1.
6.226 Notwithstanding local, regional, and national drivers of improved recycling rates and embedding of ‘circular economy’ principles, the levels of growth expected in Newham (in terms of both construction/development activity and population) mean a projected increase in waste arising figures. This policy seeks to ensure waste is managed more sustainably, minimising resource use and exploiting the economic potential of ‘waste’. It transfers EU Directive principles to the local context and urges developers to be proactive about how waste is handled in the context of increasing environmental and land use pressures. The policy contributes to the achievement of convergence (objective 1) by helping ensure the economic benefits of ‘waste’ are harnessed; the creation of high quality places (objective 2) by avoiding the amenity and environmental impacts of mishandled waste; the delivery of good growth (objective 3) by minimising the environmental impacts of resource use and waste generation; and the balancing of Newham’s local needs and strategic role (objective 4) by ensuring new waste uses satisfy identified needs and are directed to the most suitable locations. Through recycling, recovery and minimising the amount of residual waste sent to landfill, in accordance with relevant EU directives, the Waste Strategy for England 2007, Planning Policy Statement 10 (Planning for Sustainable Waste Management) and the London Plan.

6.227 Good waste management aims to drive waste arisings up the waste hierarchy by promoting waste minimisation, materials reuse, recycling and the recovery of resources including energy from the waste assets. The proximity principle derives from EU Directive and establishes that waste should in general be treated and disposed of as close to where it was produced as possible. Subject to other environmental, efficiency, and feasibility considerations, the principle seeks to minimise the impacts of transport and multi-handling of waste. It is reflected in London Plan policy 5.16, which sets out to deliver net waste self-sufficiency for London by 2026. The principle of prioritising rail and water transport of waste also seeks to minimise the environmental impacts of waste transfer as Heavy Goods Vehicles are known to have significant impacts on air quality and traffic flows. While this may be difficult to deliver through collection services, Newham’s position next to the Thames and the high levels of construction activity in the borough should enable implementation of the policy in other ways. That is derived from households and industry. A number of processes are involved:

1. Sorting at source, where households and businesses sort their own waste into waste and recycling streams;
2. Sorting of recyclates at Materials Recycling Facilities (MRF);
3. Recovering materials and recyclates at Bio-Materials Recovery Facilities (Bio-MRF);
4. Direct recycling of materials such as food-grade plastics, with recovery and re-manufacture taking place on the same site;
5. Metals recycling (vehicle dismantlers);
6. Final processing of waste products with the aim of minimising rejected waste sent to landfill. Processes include composting, anaerobic digestion, gasification and combustion (for energy); and
7. Landfill for rejected items that cannot be recycled or recovered.
6.228 In line with self-sufficiency objectives and to meet regional needs, the London Plan 2011 sets out an apportionment target of waste to be processed and managed by each London borough. As Newham is in a waste authority partnership with three other London boroughs, this is primarily done through the identification and safeguarding of sites within the East London Waste Plan. Adopted in 2012 as the Joint Waste Development Plan for the East London Waste Authority Boroughs (link in policy footnote above), this Joint Waste Plan is likely to be updated within the Local Plan period to reflect changes in land use configuration and updates to waste apportionment figures. Sufficient suitable sites in accordance with environmental principles, and legislation relating to environmental protection and the minimisation or appropriate mitigation of adverse impacts arising from waste management operations.

6.229 The Council also seeks to minimise or mitigate the impacts of waste management, processing and transport and management on the environment and the borough’s residents. Consequently, preference will be given to proposals that make efficient use of space, enable and make provision for access by river and rail freight, and avoid harmful impacts on amenity and air quality (see related policies SC5 and SP8). Planning conditions may be established to define the proportion of waste transported by these modes. Policy INF1 establishes support for water transport infrastructure and safeguards Bow Goods Yard.

6.229a The spatial strategy sets out that where the introduction or expansion of waste facilities meets and identifiable local need, Schedule 1 safeguarded sites followed by Strategic Industrial Locations will be prioritised. This approach helps to direct waste uses to the most appropriate locations (often in terms of impacts and serviceability) and helps to protect those uses long term. In the context of this policy, ‘local’ means not only waste arising within Newham, but also waste handling capacity that contributes to the meeting of London Plan apportionment targets and deals with waste arising within other London boroughs (i.e. part of Newham’s local need is its regional role). As such, proposals that do not demonstrate how they meet local or regional need will generally not be supported. It is however acknowledged that given that the Joint Waste Plan review has yet to commence, with its process of need analysis and site search, which may identify further suitable locations.

6.229b Beckton Riverside is a significant growth area as signalled in the London Plan and expected GLA OAPF; the spatial strategy approach above seeks to balance the needs of waste capacity protection with growth and housing delivery targets. Whilst recognising that the scale of development expected for the area is such that a new waste facility could be incorporated, the policy allows for shift in waste needs over time. Given the scale and complexity of development envisioned for Beckton Riverside (see Strategic Site allocation for more detail) realisation of opportunities is expected to have a long lead time; in that time, waste needs may change significantly, for example through improved recycling rates, changes in London Plan apportionment methodology, or the securing of other safeguarded sites.

6.229c It is acknowledged, that as with other industrial uses, waste processing/management facilities have come under pressure due to competing land uses, notably residential, not least as many have been inappropriately regarded until recently as ‘inefficient’ users of space. Whilst land use change must necessarily continue in the borough, such uses are
afforded protection through the Managed Release, Managed transition and Managed Intensification criteria in Policy J2, with the industrial land safeguarded with capacity allowing for their accommodation in the borough according to projected need in the ELR (in which they are a component of identified industrial space requirements including an allowance for sub-regional demand/apportionment).

6.230 Heavy goods vehicles (HGVs) have a significant impact on the quality of the environment of the borough’s streets. The Council, in recognising the primary role played by HGVs in waste transport, will seek to minimise their impact by using planning conditions to restrict strategic HGV movements to the primary road network and other, suitable non-residential, roads.

6.231 The Council recognises that modernisation and additional capacity will be required to deal with foul and storm water arisings and sewage sludge in London and supports Thames Water’s proposals for developing additional treatment capacity at Beckton Sewage Treatment Works, including sludge treatment facilities, as part of wider investment that will benefit London as a whole.

6.232 The Council supports proposals for additional combined foul and storm sewage storage tunnels proposed as the Thames Tunnel and Lea Tunnel, which will substantially reduce the frequency of system overloading and subsequent discharge of untreated sewage into the Rivers Thames and Lea, in accordance with national policy and London Plan Policy 5.14 and subject to satisfactory stakeholder engagement and the assessment and mitigation of environmental impacts.

6.233 The London Plan sets out its policies a hierarchical approach to managing London’s surface water and combined foul and surface water drainage, expressed in Policies 5.12 (flood risk management), 5.13 (sustainable drainage), 5.14 (water quality and sewerage infrastructure) and 5.15 (water use and supplies).

Implementation

6.233 Schedule 1 and 2 waste sites are currently found within the 2012 Joint Waste Plan though this is likely to be reviewed in the plan period. The policy will remain applicable to any replacement ‘Schedule 1’ sites (i.e. safeguarded); the updated plan is likely to be called the East London Waste Plan (ELWP). Schedule 2 sites, which reflect capacity to meet strategic waste needs will be revisited by the update; in the meantime should development come forward on that presently identified in Beckton (which falls within the Beckton Riverside Strategic Site S01) the site allocation together with this policy provides for delivery of a strategic waste facility in accordance with the objectives of the Joint Waste Plan Policy W2, directing such development to remaining SIL or requiring the submission of updated evidence that demonstrates that the strategic need is no longer present. This may be due to intensification of capacity elsewhere, changing waste needs and apportionment (including a revised sub-regional distribution) or identification of an alternative site to meet that need.
6.233a Further guidance on the meaning and application of the waste hierarchy is available from DEFRA\(^4\) and WRAP\(^5\) (the Waste and Resources Action Programme), specific government guidance on applying the hierarchy to the management of hazardous waste management is also available\(^6\).

6.233b Supporting the implementation of this policy and Building Regulation requirements, the Council has produced guidance\(^7\) for new development that details the amount of waste storage capacity expected, the needs of typical Local Authority and private collection service vehicles, and best practice advice regarding bin store location and design.

6.233c Construction and Logistics Plans for new waste management proposals should demonstrate how the use of rail and water freight is maximised, particularly where sites are close to the Blue Ribbon Network. Where considered necessary, planning conditions may be established to define the proportion of waste transported by sustainable modes.

6.233d The principle of minimising spatial impacts of waste management should be applied to both waste facilities and the handling and storage of waste within other developments. Applicants should refer to policy SP8 for more detail on the range of amenity impacts that will need to be considered. In relation to facilities (including heat from waste operations) this will mean consideration of air quality impacts, overall land take, and effects on any nearby residential amenity (e.g. via noise and smell) – though the spatial strategy primarily directs waste uses to non-residential areas, not only enclosure to minimise air emissions but the minimisation of land take overall. Where considered necessary, planning conditions will be used to specify expectations in relation to enclosure and emissions mitigation.

6.233d(i) In terms of waste management within other development, the local guidance referenced above gives specific examples of how bin stores etc should be designed and located to minimise impacts as per Policy SP8. Tri-separation facilitates the separate collection and processing of three waste streams (non-recyclable waste, recycling, and food waste), improving efficiency and outcomes. While Newham does not currently operate a food waste collection service this is likely to change in future given regional and national drivers. For most developments, ‘facilitating’ will simply mean space for containers but for those incorporating chutes, tri-separators should be installed.

6.233e The consideration of the environmental protection levels delivered by new waste facility proposals will be done through the Environment Agency’s licensing processes; as such proposals should show evidence of engagement with the EA.

6.233f The requirement for major developments to make use of Site Waste Management Plans is encouraged by the Environment Agency and the London Plan given the multiple benefits they can bring including accurately estimating waste levels prior to the start of works, reducing amenity impacts, facilitating regulatory compliance, and minimising costs through early planning and consideration. Relevant guidance is produced by WRAP\(^8\).


\(^5\) http://www.fccenvironment.co.uk/assets/files/pdf/content/wrap-applying-wastehierarchy.pdf


\(^7\) https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy-to-hazardous-waste

\(^8\) www.newham.gov.uk/wasteguidance

\(^8\) http://www.wrap.org.uk/sites/files/wrap/GG899.pdf
Broadly, Newham’s operational waste management sites are situated in the Lower Lea Valley and at Jenkins Lane in Beckton. The favoured location for a future waste management site is at Beckton Riverside.

Policies relating to waste management together with details of the safeguarded sites are set out in the JWDPD.

Monitoring

Monitoring will include indicators relating to delivery of the strategic principles, spatial strategy, and design and technical criteria to assess the efficacy and suitability of the policy. Outputs related to waste activity will be drawn from review of planning consents; depending on the number of relevant applications per year this will be done via full review or sample. Whilst waste generation and recycling rates are driven by factors the planning system can only partially affect (specifically attitudes toward the importance of recycling), outcome indicators relating to recycling rates, diversion from landfill, and levels of waste collected per head will also be monitored, with information drawn from the Environment Agency’s Waste Data Interrogators.

Indicators:

i. INF-OP-10 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny].

ii. INF-OP-5 Securing more sustainable waste management:
   a. New waste management facilities in line with the spatial strategy [Target: majority of relevant consents];
   b. New/intensified waste management facilities delivering full enclosure or equivalent environmental protection [Target: majority of relevant consents];
   c. Loss of waste handling capacity [Target: no net or functional loss without compensatory capacity appropriate consistent with the strategic principles];

iii. INF-OUT-4 Reducing Waste
   a. Percentage of household waste sent for recycling, reuse or composting [No specific target, should be improving] (%);
   b. Percentage of local authority collected waste diverted from landfill in East London Waste Authority region [Barking & Dagenham, Havering, Newham, Redbridge] (%);
   c. Household waste collected per head (kg) [no specific targets, positive trends should be observed].
INF4 - Utilities Infrastructure

Local Heat and Power Networks

Objective

6.236 To facilitate growth in local heat and power networks in the borough and maximise retrofitting opportunities to reduce carbon emissions and fuel poverty for residents, and increase Newham's energy resilience.

Policy

The Council supports the development and expansion of community and district heating and cooling networks within existing and new development areas and therefore:

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

1. **Strategic principles:**
   a. Sufficient utilities infrastructure capacity (including energy and water supply, wastewater handling, and telecoms) will be established to meet the needs of development over an appropriate time horizon, with projects identified in the IDP receiving in principle support.
   b. The spatial and environmental impacts of utilities infrastructure will be minimised and where feasible reduced, particularly where existing facilities are being expanded or reconfigured.
   c. The expansion of decentralised energy networks will be facilitated and supported in principle.
   d. The use of innovative energy technologies to reduce fossil fuel use and emissions by exploiting sustainable or waste energy sources is encouraged, specifically air, ground, waste, and water heat pumps where appropriate. That make use of sewage waste and other waste currently processed in the borough, and will be encouraged in order to increase energy security and contribute to low carbon and waste processing development targets; and

2. **Spatial Strategy:**
   a. Utilities infrastructure, particularly in the Arc of Opportunity will evolve to keep up with growth and facilitate the creation of new neighbourhoods and economic opportunities. This includes but is not limited to:
      i. Expansion of operational capacity at Beckton Sewage Treatment Works.
      ii. Extension of superfast broadband to new development sites and new and existing employment areas
      iii. Provision of additional energy transmission infrastructure in the vicinity of the Royal Docks and Beckton, and heat network infrastructure to distribute locally generated energy across the Arc
      iv. De-commissioning and remediation of gasholder sites, providing necessary legacy gas pressure etc infrastructure
b. Development of sites affected by the Local Heat Network LDO will facilitate its expansion.

3. Design and technical criteria:

a. Confirmation that sufficient utilities capacity exists to meet the needs of the development will be required, with proportionate contributions to studies or upgrades made where necessary.

b. All energy sources (including CHP and renewable energy installations) with an output of 50kWe or more should provide for connection to heat networks and be flagged to the GLA for inclusion on the London Heat Map. Applications for major combined heat and power (CHP) and renewable energy developments must demonstrate how the design has made provision for connection to existing or future community or district heating and cooling networks. The local planning authority will seek where practicable to secure planning agreements to ensure that such connections are implemented;

c. Applications for As per SC2, all major development should prioritise provide for connection to heat networks or provide for connection in future where connection is not made prior to occupation those within 500m of existing networks should connect prior to completion wherever feasible. If connection is not feasible at the time the development is implemented, then the development should ensure that a future connection can be made. in the vicinity of an existing or planned district heat network or other heat distribution network

d. Heat network infrastructure should be designed, and constructed, and managed in accordance with the London Heat Network Manual\(^1\) and Policy SC2

e. Air, ground, waste, and water source heat pump installations should conform to relevant up-to-date guidance and ensure all licences from relevant statutory bodies can be acquired.

f. New and intensified utilities infrastructure projects, should demonstrate, through an options appraisal, that the favoured scheme is the most appropriate in terms of spatial and environmental impacts, costs and feasibility.

g. All new development, including road and rail schemes, should incorporate future-proofed ducting to accommodate utilities connection requirements, and be designed to allow easy access to key utilities infrastructure such as high voltage electricity cabling that falls within and adjacent to the site, as well as designing within associated safety limitations.

h. Development in the vicinity of Beckton STW should undertake an Odour Impact Assessment and respond with appropriate mitigation as necessary as per the guidance cited in policy SP8.

The Council will support the use of waterways for local heat and power networks.

Refer to combined INF4/INF3 map on page 295 for spatial elements.

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.
Reasoned Justification

6.235 Utilities infrastructure in London is already stretched; the levels of growth expected in Newham, and specifically in the Arc of Opportunity, means capacity of multiple kinds must be increased to facilitate the creation of new neighbourhoods (such as Beckton Riverside) and take up of economic opportunities (for example in the Royal Docks Enterprise Zone) that have a significant local and regional role. Known issues include water supply and sewage handling in the Thames Water area generally, energy supply/transmission infrastructure in the Royal Docks and the need to extend super-fast broadband, as per the IDP. If growth expectations are to be met, utilities enhancements must also work in tandem with new development in an already heavily urbanised area and minimise land take as well as other spatial and environmental impacts (including noise, smell, and visual intrusion). Such pressure also extends to the increasing need to decommission and remediate the now unnecessary multiple gas holders in the area, which consume considerable areas of land, with legacy gas pressure etc infrastructure being far more modest.

6.235a This policy contributes to all plan objectives, seeking to enable economic growth (objective 1), create high quality places that do not suffer the effects of utilities shortfall (objective 2), deliver good growth by embedding utilities needs and future-proofing to avoid further works and improve construction efficiency (objective 3), and balance local and strategic needs, for example in recognising that whilst facilities like Beckton Sewage Treatment Works may need to expand to meet [local and] strategic needs, that this should be counterbalanced by the minimisation of local impacts (objective 4).

6.235b District heat networks are supported by national² and London Plan planning policy as a means of meeting the requirements of the Climate Change Act to reduce UK CO₂ emissions to 80% below 1990 levels by 2050. Networks can be implemented at the scheme/site level as well as neighbourhood-wide, taking strain off the traditional grid and encouraging use of more sustainable forms of energy generation. Growth expectations in the Arc of Opportunity not only provide the need for expansion but the opportunity; the development of energy and heat networks should be embedded in the earliest stages of planning and masterplanning new development. Part of facilitating heat network expansion is an accurate picture of potential and demand, as such all energy generating sources over a certain threshold should be included on the London Heat Map.

6.235c This policy helps make best use of locally available energy sources, supporting the implementation of policies SC1 and SC2 by (amongst other things) identifying relevant standards for heat network and heat pump installations (3d/e), and requiring their spatial impacts to be minimised as far possible (1b). Government research³ has also shown the huge untapped potential of Water Source Heat Pumps in the UK and London; as such, Newham’s Royal Docks asset and position alongside the Thames should be investigated for the potential benefits of a sustainable, renewable, and ‘free’ source of heat, helping to improve local energy resilience. Similarly heat pumps can be used to exploit ground, air, and waste heat (i.e. from transport of industrial processes); provided the environmental impacts of such installations are acceptable (including no worsening of air quality), their

take-up is encouraged. These renewable technologies complement more widely understood options such as solar (PV), options for which should also be explored as an example of locally available / renewable energy (the Council notes that there is not considered to be significant potential for wind energy within the Borough).

6.235d Utilities needs are evolving, which makes definitive planning for them difficult at the point of design and construction. It is therefore logical to take an enabling approach: designing and building in additional capacity in terms of utility connection ducts, and providing for future connection to heat networks where present connection is not possible. Experience in the Olympic Park area for example, has shown that ‘passive ducting’ (beyond what was needed at the point of development completion) through development platforms has been taken up within a few years, achieving considerable cost savings on, for example, subsequent lighting and CCTV schemes.

Implementation

6.235e As per the support in principle for the expansion of heat networks, permissions for related infrastructure will normally be granted subject to appropriate mitigation of impacts and compliance with other development plan policies. To ensure longevity and efficiency (including the avoidance of heat loss), heat network apparatus should be designed and constricted in line with the GLA’s Heat Network Manual or subsequent updates.

6.235f As per the minimising spatial impacts point, opportunities for retrospectively minimising the impacts of utilities infrastructure should be sought in addition to the expectation applying to new and expanded facilities, this might apply to the undergrounding of pylons, the siting, scale, and design of sub-stations, or the reconfiguration of existing sites such as Beckton Sewage Treatment Works. While expansion of capacity is supported, and will likely mean some expansion of operational land-take, solutions should be as space efficient as possible and mitigate impacts appropriately. However, this must necessarily work in conjunction with the “agent of change” approach set out in SP8-1(c) and J1/2 in relation to new development in the vicinity of such infrastructure, including ensuring that statutory [utilities] undertaker duties and safety requirements are met.

6.235fa To confirm that sufficient capacity exists applicants should liaise with utilities providers to determine if an assessment needs to be undertaken. In the case of water and waste water it is expected that the impact of development both on and off-site is considered. In some instances it may be necessary to undertake appraisals to determine if a proposal will lead to overloading of existing water or waste water infrastructure.

6.235g Examples of relevant guidance for heat pump installations include the Environment Agency’s Good Practice for Ground Source Heating4 or the (now abolished) Department for Energy and Climate Change’s Water Source Heat Pump research5. For any apparatus to be installed in waterways, developers should seek the advice of the Port of London Authority, Environment Agency, and Marine Management Organisation where relevant, and ensure all necessary licences can be achieved.

5 Including ‘Water Source Heat Pumps – Navigating the Way: A Customer Journey for potential developers’ - these documents are available from the Local Plan team if no longer available online,
6.235h The London Heat Map\textsuperscript{6} shows existing and proposed heat networks in Stratford and the Royal Docks, including details of energy sources. In addition, the Council’s Local Heat Network LDO\textsuperscript{7} gives permission for heat network infrastructure along a determined route. Applicants intending to use the LDO would apply to the Council for prior approval, enabling delivery of the network to be monitored. Developers are encouraged to engage with the heat map to determine the opportunities associated with sites.

6.235i It is acknowledged that gasholder decommissioning and remediation is costly, though standard viability methodologies assume this is factored into viability calculations initially through land value and the concept of the ‘reasonable premium’ and then if necessary, via cross-subsidy from enabling development, if otherwise acceptable.

6.235j As per the IDP, the GLA are working with electricity infrastructure providers to resolve the pressing need for capacity upgrades to meet growing demand in the Royal Docks and Beckton. A site search, focusing on land within the GLA portfolio with minimum spatial impact is being undertaken with provisional targeting of further work on Albert Basin and Thames Wharf. This policy seeks to work within the context of that work, which in turn is consistent with its principles, though will need to be tested also against other relevant policies in the plan.

6.238 The scale of opportunity can vary on specific development sites. The London Thames Gateway Development Corporation proposed a route based on heat mapping work they undertook (see map below) that could supply 120,000 homes and extend to 23km (across the sub-region). There are also CHP plants planned at Stratford and Canning Town that could be extended to provide a service to the wider community. Greater use of decentralised energy will also help Newham become more self-sufficient and increase its energy resilience. Heat networks were identified during consultation as an important opportunity for Newham given the scale of expected development.

6.239 Clear policy support for district heat networks including the Thames Gateway heat network will provide certainty for developers and promoters of such schemes. The LTGDC has the potential to connect up to 120,000 homes and properties in Newham, Havering and Barking and Dagenham. If implemented in its entirety, this would be the largest district heating network in the UK. It is expected that the route will be built in shorter sections over the next 5-10 years and in response to available demand for consumer connections.

6.240 The Council will work with significant energy users, potential energy providers and Energy Service Companies (ESCOs) to identify and develop district energy networks. For example, there is potential for the Thames Gateway heat network to be linked up to existing heat users within the Royal Docks e.g. ExCeL, the new Siemens building and LBN’s own offices, along with other major proposals coming forward.

6.241 There is potential to bring the network forward by means of a Local Development Order, which would grant permission for works comprising but not limited to pipes, heat exchange equipment, street furniture, informational signage and ancillary engineering works. This

\textsuperscript{6} https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map

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could apply borough wide and to any district heat network provider and would expire in 5 years (or it could be revoked by the authority at any time).

6.242—If a Local Development Order is not pursued, all proposals would be subject to the above policy. Any development falling outside the scope of the LDO would also be subject to the policy.

Monitoring

6.242a Whilst the reporting systems of infrastructure and utilities providers are not consistent and easy to draw upon monitoring will try to assess the scale of objections from utilities providers on grounds of capacity, and gather evidence of utilities shortfall issues. Where major capacity issues arise (significant power outages for example, or telecoms failures) and are reported, an analysis of the role of the planning system will be included in relevant Authority Monitoring Report bulletins.

6.242b Indicators:

i. INF-OP - 6 Sufficient and Sustainable Utilities Infrastructure:
   a. Promoting Local Heat and Power Networks Energy projects delivered / KM of heat network delivered (to be monitored in line with Infrastructure Delivery Plan, should show a sustained increase in heat network infrastructure); Proportion of consents providing connections to or future connection to heat networks (via a sample audit) [No specific target: should be increasing];
   b. Utilities infrastructure planning and project milestones met [Target: milestones set out in the IDP];

ii. INF-OP - 7 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny].
INF6 - Green infrastructure & the Blue Ribbon Network

Objective

6.257 To address existing open space deficiencies, and improve the quality and accessibility of existing open spaces, improve connections, and ensure new development includes adequate open space for new residents.

Policy

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

1. Strategic Principles & Spatial Strategy:

a. Green infrastructure and the Blue Ribbon Network will be protected and enhanced. For the purposes of this protection (and to be read in conjunction with policy SC4), the sites and features identified in Appendix 3 and shown on the Policies Map are designated as Protected Green Space.

b. The multiple roles and benefits of designated and undesignated Green Infrastructure will be maximised and promote implementation of policies SP2, SP5, INF7, SC1, SC3 and SC4. Deficiencies in quantity, quality and access to open space in the borough will be addressed. Key priorities are:

c. A ‘green grid’ approach will be promoted, with new and enhanced spaces - notably as part of the Lea River Park (GI-1) - adding to the connectivity established along rail and river corridors, the Greenway (GI-4), and the chain of Metropolitan Open Land in the east of the borough (GI-2/3)\(^1\).

d. Residential and visitor moorings will be supported where need can be demonstrated outside of SIL and LIL areas in accordance with H3 and J1.

2. Design and technical criteria:

a. In effecting the need to protect green and blue infrastructure, there should be no net loss of functionality, taking into account cumulative impacts and the multiple roles and benefits of such infrastructure (including quantum where this is material to its function).

b. Development in the vicinity of the Lea Valley Regional Park should contribute to implementation of its adopted plans.

Green infrastructure will be protected and strengthened over the plan period. Deficiencies in quantity, quality and access to open space in the borough will be addressed. Key priorities are:

1 Proposed new publicly-accessible Metropolitan Open Land (MOL) at Queen Elizabeth Olympic Park in legacy, and along the Lower Lea Valley (Lea River Park);

\(^1\) ‘GI’ references refer to the Key Diagram at the start of this plan.
2 Improving access to the Lee Valley Regional Park from surrounding areas, with improved spaces, opportunities for access to nature and visitor attractions within and adjacent to the borough;

3 De-designation of MOL on operational land at Beckton Sewage Treatment Works in the Roding Valley;

4 Address existing deficiencies in quantity and quality of District and Local Parks and ensure major development contributes to provision of new public parks, particularly within the Arc of Opportunity;

1 Provision for new allotment plots;

2 Improvements to natural and semi-natural open space having regard to the priority habitats and species targets in the Biodiversity Action Plan; and

3 Address gaps in access on foot and by cycle to open spaces and natural green space.

Green Belt and the majority of MOL and protected Green Space as designated in the UDP have been retained and are included on the Proposals Map. MOL exceptions are listed above; see Proposals Map for protected Green Space changes. Due to the scale of changes that have taken place in the Olympic Park area, an indicative symbol has been used.

New development must contribute to targets for priority habitats (Public Open Spaces and Green Corridors) in the Biodiversity Action Plan. The most appropriate site (or sites) for additional burial space will be identified through the proposed Detailed Sites and Policies DPD. Any proposed burial ground should meet the following criteria:

1 The site must be of an appropriate size that ensures sufficient burial space for an appropriate number of years;

2 The site must be accessible to all sections of the community (multi-faith); and

3 Sites must be suitable for the purpose of burial.

New residential development including family homes should include (or contribute to the provision of) new children’s play space within 150m.

From INF6a: For the purposes of the protection afforded by Policy INF6, the sites and features identified in Table XX are designated as different types of Protected Green Infrastructure (as shown on the Policies Proposals map)

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 plan should conform: 1. Strategic Principles and Spatial Strategy.
**Reasoned Justification**

6.256 Green infrastructure (GI) comprises the green spaces and features (street trees, and living roofs for example) that together form a living network with a multitude of benefits. Green infrastructure can enhance not only biodiversity and habitat provision, but also improve drainage capacity and reduce flooding, cool the urban environment (helping to reduce the urban heat island effect), contribute to local and historic character, tourism potential and visual amenity, and have both physical and mental health benefits, including through encouraging walking, cycling, and other leisure and recreation activities. The importance of green infrastructure has been highlighted by the creation of a Green Infrastructure Task Force for London and the resulting report ‘Natural Capital, Investing in a Green Infrastructure for London’, and its importance is recognised in London Plan\(^2\) and national policy and guidance\(^3\).

6.256a The Blue Ribbon Network (BRN) is significant in Newham, incorporating the rivers Thames, Lea, and Roding as well as the Royal Docks. The BRN is a similar form of, and in some cases overlaps with, green infrastructure, performing an equivalent variety of roles (environmental and social) and therefore worthy of the same protection and enhancement.

6.256b The promotion and protection of green and blue infrastructure within this policy contributes to the delivery of high quality places people can enjoy living in (plan objective 2), to good growth by improving the environmental impacts of development (e.g. through drainage enhancement, or the preservation of habitats) (objective 3), and to optimising the benefits of development for local people, ensuring green infrastructure is not functionally eroded and new provision is delivered (objective 1).

6.256c Newham has an emerging ‘green grid’ but growth will inevitably mean increased pressure on green spaces and other forms of GI, both in the numbers of people wanting to access them and in competing demands on land use. Promotion and enhancement of the green grid is therefore encouraged, which will include improving connectivity to and between existing spaces and features as well as delivering new contributions. In doing so, the impact of green infrastructure interventions are enhanced, even when quantitative opportunities are limited. This is particularly the case in Urban Newham, which will also need to secure improved access to new and existing (in some cases inaccessible) larger green spaces in the Arc of Opportunity and in the east of the borough to help address existing and emerging deficiencies. The Lea River Park is a project highlighted in the IDP of particular significance in this respect. Even without public access however, green chain links should be protected and promoted given benefits to biodiversity, and, research also shows that merely being to see GI features such as trees can have health benefits.

**Implementation**

6.256d Given the desire to maximise the benefits of green infrastructure and the cross-cutting nature of those benefits, GI decisions should also be informed by policies SP2, SP5, INF7, SC1, SC3, and SC4. In line with SC4 requirements relating to the protection of habitats and

\(^2\) Policy 2.18

\(^3\) https://www.gov.uk/guidance/natural-environment#para027
The policy sets out a general presumption of protection which means that loss of green and blue infrastructure will be resisted and adverse impacts mitigated. However, where the functionality of GI can be enhanced, the alteration of existing designated and undesignated assets will be considered. Where the designated green space is publicly accessible and contributing to the adequacy of open space access of Newham’s existing and future residents [see mapping in INF7 and subsequent updates published as part of IDP updates], any changes should lead to no net loss in quantum. Generally, changes to GI and their impact on its functionality will need to be assessed in light of engagement with users and others benefiting or with the potential to benefit from GI, management bodies and other experts (such as the Environment Agency and Natural England). This will be reflected in updates to the Green Infrastructure database in Appendix 3, to be hosted on Newham’s website. The IDP will also highlight particular enhancement projects.

The Blue Ribbon Network likewise has its own custodians and regulators in Newham, including the Environment Agency, Port of London Authority (PLA), Canal and Rivers Trust, Marine Management Organisation (MMO) and Royal Docks Management Authority (RoDMA). Proposals affecting these assets should therefore be discussed at an early stage with such bodies, whose advice will be taken in the assessment of proposals. The MMO delivers UK marine policy objectives for English waters through statutory Marine Plans and other measures. Newham is within the South East Inshore Marine Plan area for which a plan will be prepared at a future date. Until the relevant Marine Plan has been prepared, the UK Marine Policy Statement should be referenced for guidance on any planning activity that includes a relevant section of coastline or tidal river (extent shown on the map attached to Policy SC3). Proposals should also have regard to the objectives of the Thames River Basin Management Plan as per policy SC2.

Proposals incorporating new moorings should cross-reference INF1 and associated implementation advice.

The Lea Valley Regional Park Authority area (LVRPA) extends into Newham as shown on the Policies Map, development in the vicinity of the LVRP area should therefore have regard to the actions set out in its adopted plans including the Lea River Park and particular policies on biodiversity for instance.

The Lea River Park is a sub-regional project being delivered by the LVRPA, the London Boroughs of Newham and Tower Hamlets, the GLA and London Legacy Development Corporation. Further detail is found in the IDP and Lea River Park Primer, Design Guide and Curatorial Approach documents published on the Council’s website, which should be referred to in locations in the Lea Valley which may contribute to or otherwise affect its delivery. These are further signposted in the spatial policies and relevant Strategic Site Allocations set out in Appendix 1.
Monitoring

6.256i Monitoring the effectiveness of the policy will focus on consents and other known activity relevant to the policy objectives. The London Development Database requires monitoring of all open space losses and gains which is useful here; however BRN impacts are more difficult to gauge other than indirectly via consultee commentary. Similarly, there is presently no satisfactory way to monitor all contributions to GI enhancement through new development, but focusing on those aspects that add to the connected green grid and that otherwise affect protected green space that would be recorded in the DB are nonetheless useful to inform policy review and to help scope further projects by the Council and its partners. In addition, engagement activity, particularly with local residents, will seek to bolster the GI/blue ribbon database to better understand components of functionality for each [water]space. There is no outcome indicator specific to this policy, given a full borough-wide green/blue infrastructure audit is too great a task to be an expected component of monitoring, with outcomes instead be reflected in other indicators concerning health and well-being, biodiversity, flood risk and climate change resilience, and satisfaction with parks.

6.256j Indicators:

   i. INF-OP-10 Green and Blue Infrastructure Protection and Enhancement:
      
     a. Protection of Green Infrastructure Environmental Protection and Enhancement  
        i) Amount of natural green space (SINCs and area deficient in nature conservation interest) (Target - via monitoring of consents - is no net loss of protected green space area and/or trees unless not affecting functionality, and no unresolved objections from BRN custodians)
     
     b. Delivery of Lea River Park projects [Target – IDP milestones];
     
     c. Other Green Grid Enhancements [No specific target, but monitor consents and other related interventions for additions to connectivity, quantity and quality relevant to the GI database];

   ii. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal].

6.258 Green Infrastructure is a term used to describe the multi-functional uses of open space. These include visual amenity, historic character, accessibility and active travel, children’s play space and quiet enjoyment, tourism, leisure and recreation, biodiversity, local food growing, surface water attenuation, reducing the urban heat island effect and improving air quality and climate change adaptation. Ensuring existing and future populations have access to high quality inclusive open space is a priority.

6.259 There are 479 hectares of open space within Newham. This is formed of formal public parks, informal parks and local open spaces, linear routes, waterways including rivers, canals and towing paths, and other informal spaces.
6.260 In common with other urban boroughs, the provision of open space per 1000 population falls short of the 2.4 ha FiT standard, with an average of 1.99 ha of open space provision per 1000 population. While the designation on its completion of the Olympic Park as Metropolitan Open Land will bring this average nearer to the FiT standard, there are deficiencies in open space elsewhere in the borough that need to be addressed to meet the Core Strategy’s vision for a place which is attractive for families to live, work and stay, and meets the needs of visitors for recreation and leisure.

6.261 The London Plan East London Green Grid sets out the open space resource in East London and provides a spatial approach to identifying locations for new publicly accessible open spaces, improving existing open spaces, and strengthening connections between spaces and destination points. This provides a strategic overview for improvements to Green Infrastructure that crosses borough boundaries, such as the Olympic Park, Lee Valley Regional Park, Lea River Park, Roding Valley linear green space and river crossings, and links to major open space to the north such as Wanstead Flats. An open space assessment of the borough (which also took into account provision beyond the borough boundaries) found that there were areas of deficiency in the quantity, quality and accessibility of open spaces (see map).

6.262 There are deficiencies in local open space in Manor Park, East Ham and Green Street. Canning Town is not within the catchment of a District Park; improvements are programmed to existing open spaces to improve the quality and functions of the space to address this deficiency.

6.263 A key theme of the Core Strategy is to increase the number of family homes. It is important to provide easily accessible and safe playing areas within easy reach of family homes.

6.264 There are linear barriers to local connectivity particularly road, rail and water spaces and courses and large undeveloped spaces. Improvements to connectivity along and across these barriers, particularly on foot and by pedal cycle will be necessary to address this issue.

6.265 Over 500 residents are on a waiting list for allotments. This latent suppressed demand equates to 12.5 ha. There will also be latent potential demand arising from population growth over the plan period. Using GLA population projections a further 14 ha of allotment provision will be needed. 2.1 ha (85 plots) are to come forward as part of the Olympic Legacy plans but this would still leave a need for 24.5 ha of allotment provision.

6.266 In addition, the Biodiversity Study noted that there was a lack of access to natural open space for a significant proportion of residents, and there was scope to enhance biodiversity on existing open spaces and as part of new development (See Policy SC4).

6.267 With a significant proportion of residents in Newham preferring burial, or whose faith requires it, there is a need to plan for burial space. However, Newham is well provided for with a number of burial grounds in the borough. It is not considered that additional space will be required in the short term. Any additional sites will be considered in the preparation of the Detailed Sites and Policies DPD.
Areas of deficiency in quality, quantity and access to open space will be prioritised for investment. The Council will work with partners to address existing deficiencies in the Green Infrastructure network. The Council’s priorities are set out in the Parks Development Plan 2009-14. The Council’s Green Infrastructure investment plans and those of other private and third sector organisations will be included in annual updates of its Infrastructure Delivery Plan. This will include those of the LTGDC and successor arrangements for the Lea River Park, and those relating to the statutory functions of that part of the Lee Valley Regional Park Authority (approx 63 ha) which falls within the borough (see Map above).

Opportunities to secure new local open space will be sought through the development management process in identified deficiency areas (see also Policy INF9).

‘Meanwhile’ uses such as community food growing projects will be welcomed on appropriate sites (including floating facilities) providing they would not prejudice the longer term regeneration aspirations of the site.

Designation and precise boundary of the remainder of MOL to be defined through the Detailed Sites and Policies DPD.

New and enhanced open space of a strategic nature is included in the spatial designations schedule (OS designations). However, more detailed implications and local open space will be considered in the preparation of the Detailed Sites and Policies DPD.

**INF6a—Protected Green Infrastructure**

**Objective**

To protect and strengthen identified green infrastructure.

**Policy**

For the purposes of the protection afforded by Policy INF6, the sites and features identified in Table K below are designated as different types of Protected Green Infrastructure (as shown on the proposals map):

Table K. Note: a fuller version of the table can be found in Appendix 5.

**Policy Links**

SP5, SP8, SC5, INF6, INF7.

**Reasoned Justification**

As per paragraphs 6.271 and 6.272 of the Local Plan: Core Strategy, this DPD sets out to update and define the boundaries of the open space component of green infrastructure to be protected across the Borough. As shown in the policy and schedule above, protected green infrastructure includes locally significant green space, waterways, land designated as
SINC, MOL or Green Belt, and other non-designated elements such as trees. Applicants should be aware that trees, whilst not specifically designated given the numbers involved, are afforded additional protection by policies SP5, SC5 and SP8 and in certain cases, Tree Preservation Orders; the blue ribbon network is also provided with additional protection by Policy INF7. It should be noted that not all such open space is publicly accessible, but it can nonetheless perform green infrastructure functions as set out in INF6.

6.7 The Reasoned Justification of Policy INF6 sets out the importance of green and open space and summarises deficiencies within Newham. This additional policy facilitates implementation by providing clarity and up-to-date designations.
**INF9 Infrastructure Delivery**

**Objective**

6.292 To ensure that infrastructure is provided alongside new development to provide for local needs, setting out clear requirements for developers and addressing existing infrastructure deficits through partnership working and making best use of existing assets.

**Policy**

Priorities for infrastructure will be set out in the Infrastructure Delivery Plan, and will be updated annually. Broadly, priorities that accord with the Core Strategy’s objectives include:

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

1. **Strategic Principles and Spatial Strategy:**
   
a. All development will be required to demonstrate infrastructure sufficiency accounting for existing deficits as well as new needs arising, with new infrastructure delivered alongside housing and other growth.

b. Identified infrastructure needs and planning requirements needed to accommodate planned growth (other than those relating to access to jobs and access to conventional housing) are set out in the Infrastructure Delivery Plan and where appropriate, Site allocations and spatial policies;

c. Where infrastructure needs, including housing mix, employability interventions and the type of infrastructure solution to an issue arising are subject to viability, the following Broadly, priorities that accord with the plan’s Core Strategy’s objectives include:

   i. Family and affordable housing to help create stable, mixed and balanced communities;

   ii. Community facilities including affordable workspace, Local access to employment and training to help secure convergence and resilience; and

   iii. Infrastructure that secures good growth and optimises development potential, balancing local and strategic needs.

3. Education provision;

4. Intelligent infrastructure (‘smart grid’) e.g. decentralised energy network and retro-fitting opportunities;

5. New and improved open space;
6. Local transport and public realm improvements; and

7. Strategic transport where it does not prejudice the achievement of other local priorities as listed above

2. Technical Criteria:

a. In demonstrating infrastructure sufficiency, an assessment should be undertaken accounting for should be taken of:

i. The needs, commitments and planning requirements set out in the IDP and relevant thematic policies and site allocation specifications that reflect this.

ii. Recent technical studies and engagement with strategic infrastructure commissioners and providers that may update the position set out in the latest IDP.

iii. Accessibility, capacity and availability of existing infrastructure in the area where this is to be relied upon.

iv. Potential CIL contributions relative to the infrastructure funding gap, and mindful of the spending limitations set out in the Reg 123 list; and

v. The ability of the development proposal to make physical and financial contributions to meet needs arising where consistent with other policies and latest CIL regulations.

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.
Local authorities have a requirement to invest in their communities and to develop the necessary infrastructure (physical, social and green, including affordable and specialist housing and mechanisms to connect people to job and business opportunities) to support them, however this is not a responsibility that falls to the local authority in isolation. The development of localities requires investment from a range of sources including healthcare providers, water and sewerage undertakers, and national agencies, and developers. Where there is a substantial programme of development or regeneration, such as in Newham, there is a need for the investment strategies of the various agencies to be effectively coordinated through integrated infrastructure planning, and for growth, notably of housing, but also of employment space, to occur alongside the evolution of infrastructure. The ultimate objective is to ensure ‘good growth’ is achieved, maintaining and preferably enhancing quality of life, rather than resulting in unacceptable impacts and externalities.

A Community Infrastructure Study has been undertaken for the Council. This focuses on the identification of the future infrastructure and services that Newham will require during the plan period up to 2027. This has been achieved by assessing the baseline of existing provision to establish how demand is currently met; assessing future infrastructure requirements to support growth estimating costs and means of funding; and establishing governance arrangements.

It is important for the Council and other infrastructure providers to have a firm grasp of the infrastructure needs of the future, and how they relate to existing plans of service providers to improve service delivery. This is because the planning process provides a forum in which to align providers’ plans with the expected population and household growth in Newham; because it is important to identify any remaining funding gaps for infrastructure provision after these plans have been assessed; and because there needs to be a sound basis for infrastructure specified in site allocations and for the collection of developer contributions.

PPS 12 requires that the deliverability of the LDF, especially the Core Strategy, is set out in an Infrastructure Delivery Plan (IDP). This comprises an infrastructure delivery strategy that covers the years 1-15, and a projects schedule which has more certainty for years 1-5/6. The IDP is included at Appendix 3, and was prepared in conjunction with other stakeholders who are responsible for implementing physical, social and green infrastructure schemes. This will form the basis of a Community Infrastructure Levy (see below) but in the interim will be used to inform the negotiation of planning obligations. The NPPF confirms that the Local Planning Authority should engage with authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands. The outcome of such engagement, set out within the Infrastructure Delivery Plan (IDP) and reflected in the spatial and thematic policies demonstrates how the infrastructure needs arising from the strategy set out in the development plan will be met, including provision for managing ‘known unknowns’ which are the inevitable consequence of varying planning horizons and processes. As such the IDP has been embedded within policy to signpost to infrastructure providers, land owners and

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developers the full costs of delivering schemes in the borough and the associated impact on demand/need for infrastructure and services.

6.297 It should also be noted that there are likely to be a number of tariffs/levies operational in Newham to collect contributions from development towards the provision of supporting infrastructure e.g. the Mayor of London’s Crossrail and CIL. The LTGDC tariff will continue to apply until 2013. Some [infrastructure] policy requirements are subject to viability, and the variety of cost demands on a development means it is helpful to specify which of these are most important in light of the overall vision and objectives of the Plan. In doing so it is acknowledged that shortfalls will have to be picked up by other agencies/mechanisms e.g. direct grant funding of affordable housing.

Implementation

6.298 Infrastructure sufficiency is defined as having enough infrastructure capacity in the right places at the right time to meet needs arising [existing and future needs] in ways that meet reasonable expectations, i.e. cognisant of Such reasonable expectations relate to planning benchmarks and those achieved Pan-London and more locally, as well as those set out elsewhere in the Plan, (including accessibility benchmarks described in INF2&5], the IDP and technical studies, and impact modelling on quality of life, business continuity, blight/opportunity cost and the environment. Capacity may be new or existing, particularly through enhancements to existing, and assessments will need to be mindful of existing deficits, accessibility constraints (physical, financial, temporal, inclusivity) and the role of identified sites in addressing deficits in light of the overall scarcity of sites, particularly for open space and community facilities such as schools and healthcare.

6.298a Demonstrating infrastructure sufficiency will therefore include an assessment of [gross and net] infrastructure needs arising, and how these will be met on or off site, whether through physical (e.g. provision of floorspace, floorspace flexibility or access improvements) or financial contributions (e.g. Mayor of London and Newham CIL, S106) or other undertakings (e.g. relating to public access or user charges) necessary to make an application acceptable in planning terms. As part of this, particularly where the IDP indicates evolving plans, engagement will need to occur with key providers/undertakers/commissioners, such as Thames Water, the Newham CCG and the Council. There are still a number of uncertainties following the government’s Comprehensive Spending Review and subsequent cuts in local authority spending. Further work will therefore be undertaken to assess viability following confirmation of the Council’s budget in March 2011, prior to proposing a Community Infrastructure Levy (CIL) for Newham. The Council offers a range of pre-application services in order to help applicants develop their proposal in accordance with planning policy. Early engagement with the Council, infrastructure providers and commissioners and other statutory consultees plays an important part in achieving successful planning outcomes, particularly for large scale and complex cases where infrastructure planning is likely to be an iterative process in tandem with capacity testing.

6.298aii For small sites and windfall sites infrastructure needs are likely to be less substantial and
the infrastructure assessment should be proportionate to the scale of the development. However cumulative impact may still be an issue and the availability of services and facilities in accessible locations will be particularly relevant to an application. Proposals should set out specific consideration on this point, including any specialist needs. Again early engagement with the Council is recommended in order to establish likely issues and areas of focus.

6.298a Development proposals, particularly on Strategic Sites, need to ensure that their infrastructure requirements do not place an unacceptable impact onto existing communities or infrastructure, in turn fettering future development i.e. through under provision of community facilities, excessive demand on utilities, insufficient public transport capacity to cope with additional demand etc. This will be particularly relevant where the development proposed is not accounted for in funded infrastructure plans including where the proposal places different infrastructure demands than envisioned in the development plan or most recent IDP.

6.298aii In anticipating what degree of capacity shortfall would be met by CIL expenditure, applicants should be mindful of the Regulation 123 list which delimits what CIL may be spent on locally, and the scale of the funding gap outlined in the CIL charging schedule evidence base or such other updated evidence, relative to likely CIL receipts given CIL levels and coverage (i.e. exclusion of certain forms of development). The annual CIL receipts and expenditure are reported in the Community Infrastructure Levy (CIL) Report and published in accordance with the CIL Regulations. Broadly, mitigation of impacts of a development should not be expected to be [wholly] provided by CIL; to ensure development is acceptable account must be taken of the full impact of the proposal on existing communities and infrastructure.

6.298aiv Where appropriate, financial and non-financial planning obligations will be sought to secure the provision, operation of, and maintenance/management of site specific infrastructure and the mitigation of any environmental impacts arising from development necessary to make the development acceptable in planning terms.

6.298b The IDP is intended to inform the plans of both developers and providers, whilst providing comfort for existing residents and businesses that growth can be appropriately accommodated within planned infrastructure provision/infrastructure planning processes. It will be periodically updated, ideally annually, to clarify what has been delivered and any change in the need/demand for infrastructure as per updated information from providers and technical studies, which should be factored into masterplanning, impact/sufficiency testing and providers’ strategic planning. Infrastructure projects identified within the IDP are regarded as having demonstrated need and a strategic approach to infrastructure where this is a policy requirement, notably INF8.

6.298c Where engagement with infrastructure providers and commissioners to update the IDP proves challenging despite Duty to Co-operate obligations, efforts will be made to escalate the issue, notably through work with neighbouring authorities and the GLA. Such difficulties will also be noted in the IDP itself, identifying its information may be incomplete.
6.298c A Planning Obligations Supplementary Planning Document will be produced to clarify, in line with the Regulation 123 list, what the expectations are of in-kind or financial contributions towards physical and social infrastructure. The priority list in 1c is to guide the application of review mechanisms and negotiations; the weight given to each priority category will vary on a site by site basis according to particular strategic and local needs which are reflected in specific site allocations and designations and associated policies. Infrastructure to deliver good growth is that that falls within the remit of the IDP.

Monitoring

6.299 Regular monitoring and review of infrastructure delivery will be required, through the Annual Monitoring Report. Delivery of infrastructure will be kept under review, monitored against the indicators set out below and through ongoing engagement with commissioners and providers published in the LBN Authority Monitoring Report, annual S106 and CIL reports and associated monitoring bulletins and in updates to the IDP. Going forward, updates to the IDP will be used to update the spatial strategy where these updates are aligned with Plan Review. Outcomes are not specific to the policy; rather, reference should be made to those identified under S1 relating to the overall spatial vision of which this policy is an important part.

6.299a Indicators

i. INF-OP-15 Securing Appropriate Infrastructure Delivery Mechanisms:
   a. Developer contributions for community infrastructure and open space improvements (including physical and financial contributions)[no specific target, should be relevant to the IDP and spatial strategy];
   b. CIL Charging Schedule and Receipts /Spend. [no target, reference to the infrastructure funding gap will be made];
   c. Overall IDP progress and other infrastructure delivery mechanisms [targets are the milestones set out in the IDP];

ii. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal].