About Newham’s Local Plan Review

To maintain our suite of up to date and robust planning policy, a review of the main, overarching components of Newham’s Local Plan is being undertaken. The Issues and Options document is the first main stage of the review and will be followed by a Proposed Submission draft later in the year. This document contains the main issues and options that we’ve identified in terms of Newham’s future development and the fitness of existing policies and site allocations and designations to address them. The public consultation on the document presents a key opportunity for feedback and engagement as part of the plan-making process.

This document was published on 24th February for a 6 week consultation period. Comments should be made by 7th April 2017.

Consultation Documents and How to Comment

The consultation document comprises the following parts:

- Issues and Options Part 1: Policies
- Issues and Options Part 2: Sites

Accompanying Documents include:

- Integrated Impact Assessment (IIA)
- Evidence Base (various documents)

Documents can be viewed on the Council’s consultation page [www.newham.gov.uk.planningconsultations](http://www.newham.gov.uk.planningconsultations)

Paper copies of the Issues and Options document and key accompanying documents will be available to view at East Ham Customer Service Centre (328 Barking Road, E6 2RT – check for opening times) and by appointment only at Newham Dockside (1000 Dockside Road, E16 2QU – please call 020 3373 8300 between 9 and 12, Monday to Friday to arrange).

The documents can also be accessed electronically at all Newham libraries.

The Council are currently seeking views in relation to the questions raised throughout the document. You can comment by emailing the Council at [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)
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For Issues and Options: Sites contents – see Part 2.
Mayor’s Introduction

Nowhere else in the UK is undergoing transformation on the scale of Newham and in the past 20 years we have seen major progress and a huge change in the nature of our population as people from all over the world were, and still are, attracted to London and Newham – making us the most diverse place in the UK. With an abundance of development land, excellent transport links and an energetic and increasingly skilled workforce, the borough is well placed to progress further and accommodate London’s eastwards growth in the 21st century. I’m proud that as a council we continue to embrace such opportunities for our people.

Since the adoption of the Local Plan Core Strategy, which is our blueprint for regeneration in the borough, physical transformation and plans for Newham have progressed at an unprecedented rate. The greatest ever Olympic Games and Paralympic Games were held here. We now have an Enterprise Zone in the Royal Docks. Development projects like Westfield in Stratford and the £3.7 billion Canning Town and Custom House regeneration programme are delivering and creating thousands of new homes and jobs.

This is not the end of Newham’s story and many other opportunities are available in the borough. We must keep pace with the changes afoot and continue to harness this massive physical change to maximise the benefits for all of Newham’s residents, a task that Newham’s Local Plan Review seeks to achieve through the continued provision of jobs, homes and the infrastructure needed to support them. It is essential in our ambitions to build resilience in the borough create a positive and lasting impact for our residents.

I thank those of you who have taken part in our plan-making process previously. Please continue to let us know what you think. It is important that we keep on working together in shaping our borough for the benefit of all of us.

Sir Robin Wales – Mayor of Newham
Introduction

Newham’s Local Plan Review

As well as the Council’s Local Plan, there are a number of policy documents that together will shape the future of Newham, including national and regional policy and guidance, which the Local Plan must be consistent with. Newham’s Local Plan currently comprises the Local Plan: Core Strategy (2012), Local Plan: Detailed Sites and Policies DPD (DSPDPD, 2016), the Joint Waste Development Plan (2012) and the Local Plan: Policies Map (2016). A Gypsy and Traveller Accommodation DPD is also being progressed and is currently under Examination.

The Core Strategy, a key component of the Local Plan, contains both strategic policy and site allocations where the majority of Newham’s development will take place. The DSPDPD adds further detailed policy to complement and strengthen those of the Core Strategy and contains a number of non-strategic site allocations and designations that assist in the delivery of the strategic vision and help with policy implementation. It is closely related to the Core Strategy so both must be reviewed together, despite its recent adoption. The Policies Map provides a visual of all policy allocations and designations that apply throughout the borough.

Since the Core Strategy’s adoption in 2012, there have been a number of changes to the development context in the borough largely through the implementation of the strategic vision, in particularly the realisation of development opportunities on a number of
identified sites. A number of changes have also occurred to national and regional policy during that time. To ensure that Newham’s planning policies remain robust and up to date, the Local Plan Review (LPR) is revisiting the existing strategic vision, policy objectives and site allocations, considering any areas that may need strengthening or amending in light of any recent changes. To facilitate future development and ensure that opportunities to positively affect change are maximised, the review is also seeking to identify additional site allocations and designations. It will also provide an opportunity to streamline Newham’s planning policy documents, consolidating the Core Strategy and DSPDPD into one document.

**Issues and Options and the Plan-making Process**

The Issues and Options paper is the first main stage in the preparation of the LPR. At this point it does not include draft policies; these will be drafted on the basis of Issues and Options consultation feedback and further technical studies (notably the Strategic Floodrisk Assessment, and viability testing) and will be included in a later version of the document.

The main document is supported by a number of others, as follows:

- Integrated Impact Assessment (IIA) comprising Habitat Regulations Assessment, Sustainability Appraisal and Equalities Impact Assessment
- Evidence base (see Local Plan page on the Council’s website)

The IIA evolves as the Plan-making process proceeds; it has informed the content of the main document by testing each of the scoped site allocations and policy options; following consultation it will be reviewed and will inform the Proposed Submission version of the LPR.

The LPR must be supported and justified by a robust evidence base. Additional evidence has been gathered for this document, which complements that already produced for adopted Local Plan documents; this will also evolve as the Plan progresses.
At this stage mapping has been included in the form of ‘insets’ which provide more detail for particular sites. Once the LPR is complete and the updated Local Plan is adopted, the mapping will be incorporated into an amended Policies Map.

**Proposed Timetable**

The timetable proposed for preparation and adoption of the document is as follows:

<table>
<thead>
<tr>
<th>Plan Stage</th>
<th>Date</th>
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<tbody>
<tr>
<td>Call for Sites</td>
<td>May/ June 2016</td>
</tr>
<tr>
<td>Issues and Options document public consultation</td>
<td>February/ April 2017</td>
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<tr>
<td><em>This consultation</em></td>
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<tr>
<td>Proposed Submission draft public consultation</td>
<td>Summer 2017</td>
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<tr>
<td>Submission to Secretary of the State</td>
<td>Late Summer 2017</td>
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<tr>
<td>Examination</td>
<td>Autumn/ Winter 2017</td>
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<tr>
<td>Inspector’s Report and Adoption by the Council</td>
<td>Winter/ Spring 2018</td>
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Further information will be published on the Council’s website in due course.
Content Summary

The first part of the document covers 8 inter-related policy themes. Each of theme considers what needs to be achieved as part of LPR, what issues have been identified, potential policy options, and provides a set of consultation questions relating to the approach taken. Themes follow the existing Local Plan: Core Strategy spatial and thematic policies and include:

- **Vision & Spatial Policies** – revisits the existing overarching strategic vision for the borough’s development and considers any changes required to area specific policies to maximise opportunities for housing, jobs and infrastructure growth.
- **Successful Places** – continues to strive for high standards in place-making and design in accordance with the spatial vision and the achievement of high quality, distinct places.
- **Jobs, Business and Skills** – supports Newham’s economic growth agenda through the identification or potential emerging industries and rationalisation of land supply and maximises opportunities for skills development of the borough’s population via the planning process.
- **Homes** – considers how to further maximise and balance the supply of well-designed quality homes of varying types, tenures and sizes to meet the needs of Newham’s residents.
- **Sustainability & Climate Change** – explores where planning policy’s response to flood resilience, air quality, waste management, energy use and generation, and green infrastructure can be improved.
- **Strategic & Sustainable Transport** – further promotes sustainable transport and updates the policy position on major transport infrastructure projects of strategic importance planned within the borough.
- **Social Infrastructure** – manages and enhances the delivery of good quality social infrastructure (essentially shops and and community facilities) to meet need within the borough.
- **Social and Physical Infrastructure Delivery** – ensures that priorities and mechanisms for infrastructure delivery to support growth are clearly set out in policy.
Have Your Say

This consultation is your opportunity to comment on the issues, options and sites that we have identified, and tell us whether the options we are proposing are appropriate and capture all opportunities for enhancement of the borough.

Whilst each theme has its own questions to help prompt your thoughts, overall we are asking:

1. Have we considered all the issues – are there other related issues we should be considering?
2. Are the options that we have identified to address the issues appropriate?
3. Are there any other appropriate options that we have missed?
4. Are there preferred options among those we have proposed?

For further information on how to comment, please visit www.newham.gov.uk.planningconsultations
Abbreviations

AMR: Authority Monitoring Report
AQMAs: Air Quality Management Zones
BFL12: Building For Life 12
BIM: Building Information Modelling
BREEAM: Building Research Establishment Environmental Assessment Method
CHP: Combined Heat and Power
CIL: Community Infrastructure Levy
CPO: Compulsory Purchase Order
Defra: Department for Environment, Food and Rural Affairs
DECC: Department for Energy and Climate Change
DIF: Development Infrastructure Funding
DLR: Docklands Light Railway
DPD: Development Plan Document
DSPDPD: Detailed Sites and Policies Development Plan Document
ELFT: East London Foundation Trust
ELR: Newham Employment Land Review
FE: Further Education
GLA: Greater London Authority
HMO: House in Multiple Occupation
IDP: Newham’s Infrastructure Delivery Plan
IIA: Integrated Impact Assessment
JSNA: Joint Strategic Needs Assessment
LBN: London Borough of Newham
LIL: Local Industrial Location
LIP: Local Implementation
LLDC: London Legacy Development Corporation
LMUA: Local Mixed Use Area
LPA: Local Planning Authority
LPR: Local Plan Review
MBOA: Micro Business Opportunity Area
MOL: Metropolitan Open Land
MUGAs: Multi-Use Play Areas
NCCG: Newham Clinical Commissioning Group
NCFE: Newham College of Further Education
NPPF: National Planning Policy Framework
OAPF: Opportunity Area Planning Framework
PPG: Planning Practice Guidance
PRS: Private Rented Sector
PTAL: Public Transport Accessibility Level
SCC: Sustainability and Climate Change
SFRA: Strategic Flood Risk Assessment
SIL: Strategic Industrial Location
SINC: Site of Importance for Nature Conservation
SPD/G: Supplementary Planning Document/Guidance
SoS: Secretary of State
SuDS: Sustainable Urban Drainage System
STOAs: Sustainable Travel Opportunity Areas
UEL: University of East London
Vision & Spatial Policies

Issues

You told us:

- While space for large scale development is a major opportunity there is concern that some infrastructure, particularly public transport and roads, are at capacity.
- The vision is too much about homes and not enough about jobs – it feels like they are being squeezed out by homes.
- Newham residents are fairly content with their neighbourhoods, but apart from qualitative change, more focus is required on:
  - Ensuring local access to things people need and want as part of their lifestyle, including evening and cultural activities
  - Providing more and better-quality green and open spaces
  - Improving connectivity, particularly north-south
  - What happens outside of large development sites, and how they interact with the wider neighbourhood?

We know that:

- Newham has benefited from an upturn in development activity, particularly in Stratford, Canning Town, and increasingly the Royal Docks, but also in Urban Newham, where new and improving public transport connections are helping to drive investment interest.
- Both Strategic Sites and cumulatively, non-strategic sites and other designations, have a significant role in delivering the borough’s vision when set within a spatial strategy.
- Newham is evolving to become less peripheral in economic and spatial terms, with new development areas becoming or set to become important economic contributors to the London-wide economy.
We Already:

- Provide an overarching strategy for Newham’s development, focusing on the Arc of Opportunity for major growth, and maximising Crossrail and other regeneration opportunities elsewhere in Urban Newham.
- Seek to guide development through area-specific policies that recognise the unique character and circumstance of each, whilst ensuring that growth is co-ordinated with infrastructure and other requirements.
- Allocate a number of Strategic Sites for mixed use development or particular development needs (social infrastructure, education, green spaces, housing), safeguard Strategic industrial Locations, and provide a town centres strategy based on hierarchy.
- Allocate non-strategic residential sites plus local mixed use and industrial areas, together with the identification of areas of search for community facilities and micro-businesses.

We are concerned that:

- New site allocations, areas of search and designations introduced by the Detailed Sites and Policies DPD (and proposed through this consultation) as well as some site designations listed in the Core Strategy Appendix 1 (some of which clarify the strategic role of Strategic Sites) have not been set within spatial policies so as to maximise their aggregate and cumulative impact and ensure integration.
- Spatial policies make inadequate reference to physical infrastructure requirements other than strategic transport.
- Key informative concepts that drive various thematic policies are under-emphasised in the spatial policies, notably stable, mixed and balanced communities, and resilience.
- The Lea River Park is referenced mainly as a linear walking and cycling route, rather than a major open space development that addresses areas of deficiency; some requirements for it have evolved and could be better specified in policy.
- Spatial (location/configuration) in relation to open space provision more broadly are under-specified.
- The need for and support for modal shift is not sufficiently reflected in spatial policies including routes targeted for active travel, and specifications of route penetration (the frequency of walking and cycling route nodes/connections through an area, and need to bring buses into new neighbourhoods).
Depots and other utilities infrastructure (e.g. the Woolwich ferry, sewage works) associated with a time when Newham was more peripheral and a ‘service yard’ for London continue to have a disproportionate presence in the borough that doesn’t reflect the new status of the borough within the London economy.

**Implications**

Local Plan Review will need to:

1. Through updates and additions to the vision and spatial policies, reflect the evolution of borough-wide, thematic and area-specific aspirations, recognising progress to date, changes in place character, new opportunities and challenges, and revised Pan-London policy and market contexts.
2. Tie together and provide spatial coherence to proposed spatial allocations and designations, and existing ones in the Core Strategy and Detailed Sites and Policies DPD.
3. Ensure appropriate alignment/integration with spatial policies that have evolved in neighbouring Local Plans, notably the LLDC’s, which also requires removal of reference to some sites and areas. Remove LLDC site and areas except in relation to ensuring cross-boundary integration and connectivity.
## Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Pros, Cons, Justification</th>
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<tbody>
<tr>
<td>1. Do nothing more than we already do S1-S6 and others as cross-referenced.</td>
<td>The borough-wide and area-based spatial policies have successfully guided development in the borough to date and remain relevant and fairly comprehensive. Continuity can be an advantage, however policy revision would address changes in contexts, progress already made in certain areas, and new opportunities and threats as identified. Not revising the policies risks missing opportunities, not addressing new challenges, as well as policies becoming out-of-date.</td>
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<tr>
<td>2. Amend allocated site boundaries to reflect the Options scoped in Issues and Options Part 2: Sites.</td>
<td>Not all strategic sites originally identified have been delivered or have extant applications. However, progress has also been made though promotion of sites, masterplanning exercises, and pre-application discussions, which have identified further challenges and opportunities for the delivery of each site. Not amending site boundaries would provide policy continuity, but would also represent a missed opportunity to maximise the benefits of a site, address new identified issues, and reflect progress to date.</td>
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<tr>
<td>3. Amend site allocations specifications to reflect the Options scoped in Issues and Options Part 2: Sites.</td>
<td>Not amending site allocation specifications would provide policy continuity. However, revision of some existing specifications would ensure that they reflect development to date, fit more complementarily with thematic policies and in some cases, better reflect site opportunities including revised boundaries.</td>
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<td>4. Introduce new strategic sites as scoped in Issues and Options Part 2: Sites.</td>
<td>The addition of new Strategic Sites ensures that Newham will continue to offer a range of development opportunities to provide necessary homes, jobs and infrastructure on a scale and in locations that help to meet its strategic spatial vision, delivering new mixed use development (Royals and Beckton sites) and important connections (Canning Town Riverside) and supporting town centre viability and vitality (East Ham Northern and Western Gateway sites; Alpine Way). New sites would take advantage of emerging opportunities, maximising development benefits for local residents, such as improving local connectivity, permeability and public realm, providing new social or green infrastructure. Allocations of new strategic housing sites will ensure that Newham is able to continue to secure its Five Year Land Supply, helping to prevent unwanted development that may come forward through the appeal process.</td>
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<tr>
<td>5. Introduce new non-strategic sites as scoped in Issues and Options Part 2: Sites.</td>
<td>Non-strategic sites would provide an invaluable opportunity for regeneration in established neighbourhoods. While smaller sites may nevertheless progress as windfall development, their inclusion as part of a spatial strategy would ensure that the potential of each site is highlighted and constraints acknowledged, and infrastructure impacts accounted for. Non-strategic sites, taken together, also have the potential to substantially contribute towards achieving Newham’s need for housing, jobs, social infrastructure etc.</td>
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6. Spatial Policy Options

a. Bring convergence, resilience and stable, mixed and balanced communities and ‘homes not at the expense of jobs’ objectives into the policy criteria (rather than just the start of the policy S1).

b. Update housing numbers and jobs targets (all spatial policies) and explain the strategic role of proposed and existing Strategic Sites and designations and specify how they should integrate with existing/remaining areas (e.g. the transition between S14 and the existing town centre focussed on Barking Road) (S1 and area policies).

c. Refer explicitly to physical infrastructure requirements needed to be aligned with growth (as well as social and green infrastructure) (policy S1, vision)

d. Clarify that the ‘major shift from traditional industrial activity’ will take place in a managed way, with continuing protection of locally-significant and London-wide significant industrial areas, and management of spatial transitions between contrasting uses (Policy S1 and area policies, vision).

e. Support wharf consolidation and the reduced spatial impact of utilities including transport depots, ferry access, sewage works (Policy S1, and area policies – especially Beckton and the Royals, vision).

f. Promote the delivery of new strategic connectivity routes through Stratford, (east-west south of the High Street) Canning Town, (east-west Custom House to Canning Town, Activity street and Residential street) the Royal Docks, (activating the North Woolwich Road between Tidal Basin roundabout and North Woolwich Roundabout, and longer term, Woolwich Manor way between North Woolwich and Albert Island) and Beckton and related to the Lea River Park/Lea Way highlighting the role of Key Corridors in each area (S1 and area policies, vision).

g. Promote a significant modal shift towards active modes of travel and public transport, highlighting the particular opportunities in the Royals and Beckton and the importance of route/network node/connection frequency (100m/200m for walking/cycling respectively, 800m for nodal public transport access) and penetration into and connectivity across areas (S1 and area policies) which can also serve as important local view corridors in terms of views of character assets including the Thames, Docks and other

These options indicate the necessary updates to be made to the spatial policies, ensuring that updates to the vision, the thematic policies and site allocations and designations are fully embedded within them by identifying relevant spatial consequences in as specific yet flexible a way as possible. They also clarify the importance of various aspects of the vision in policy terms and afford the opportunity to make appropriate cross-boundary references so achieve strategic synergies.
| h. | Highlight the strategic open space role to be played by various Canning Town and Custom House and riverside Strategic Sites (in terms of the location, quantum, quality, accessibility and connectivity of open space provision) and the Lea River Park, and its components; specify bridges and other connecting infrastructure/routes (S1, S2, S3, S4, vision). |
| i. | Ensure all other ‘spatial designations’ in Appendix 1 of the Core Strategy are adequately reflected in the spatial policies where this continues to be appropriate (S1, area policies, vision). |
| j. | Reinforce the need to integrate sustainable design, technologies and management techniques into every development at every scale, in line with SP and SC policies (S1). |
| k. | Otherwise reflect changes to thematic policies concerning the night-time, visitor and cultural economy; tall buildings, housing protection, flood resilient design, social infrastructure, and associated site allocations and designations (all spatial policies). |
| l. | Make appropriate reference to neighbouring Local Plan spatial policies (all spatial policies). |

7. Review all other spatial policies to ensure that they are up-to-date, focussed, concise and comprehensive in light of the issues identified above.

Editing policies in the existing Local Plan would support their implementation to best effect and ensure that they are up to date in relation to the broader policy context, wider corporate initiatives, opportunities and external standards.

Some changes may however make policies marginally longer and more unwieldy.
**Questions**

- Do any of the thematic policies (successful places, jobs, homes, sustainability, transport etc.) need to be further translated into implications for particular areas?
- Is our approach to new site allocations and existing site amendments appropriate? (see Issues and Options Part 2: Sites)
  - What are the preferred options on the new sites and existing site amendments?
  - Are site boundaries appropriate?
  - Have all constraints and opportunities been identified/considered?
  - Are there any sites that are developable and deliverable that we have not identified that aren’t already in the Plan?
- Are there any other area specific issues that we should be considering?
Thematic Policy: Successful Places

Issues

You told us:

- Newham residents value a community that feels safe and support opportunities to promote healthier neighbourhoods.
- Traffic congestion is a significant concern.
- Town centres need upgrading and investment to provide a better environment as well as better shopping and leisure opportunities; numbers of betting shops and takeaways continue to be of concern.
- There should be more activities for children in the borough.
- Tall buildings appear to be justifiable everywhere and are being proposed too often as the only option for a site despite concerns about their suitability.

We know that:

- Successful Places Policies are operating fairly successfully and continue to be an important reason for refusal of poor quality proposals; and are well supported at appeal.
- Councils are now responsible for public health: Newham is focusing on increasing healthy life expectancy (quality of life) and disability free life years (prevention).
- Town centres face challenges from changes in shopping behaviours, notably a shift to more ‘basket’/top up shopping, internet shopping, and an increased importance of leisure spend.
- Some town and local centres (Maryland, Forest Gate and Manor Park) are benefiting from investment in the public realm as part of the wider Crossrail project.
- Building heights and densities continue to increase in new development beyond what was envisaged in 2011.
The Mayor's New Deal for Newham includes Keeping Newham Moving – a New Deal for our Roads: investing £100 million over the next ten years to improve the borough’s roads, footpaths and streetlights to help people travel across Newham as safely and smoothly as possible.

We already:

-通过特定的政策和做法（SP1）健康的城市规划，（SP2）优质的都市设计，（SP3）管理和地方中心（SP6）和邻里（SP8）的要求开发不同规模的贡献，以实现高质量的设计，从而创造成功的健康、安全、安全、包容、活跃、至关重要的和独特的环境。
-确保在管理新高楼的选址时，考虑到当地的和历史的背景以及公共运输的可达性、可识别性、地方性的和可持续的社区目标，需要实现最高的设计质量（SP4）。
-认识到自然、文化和历史、建筑和基础设施资产的价值，确保新开发项目保护和增强这些资产，以支持地方性（SP5）。
-寻求通过高质量的城市设计（包括对带状发展中心的整合）和公共领域改善来人性化这些地方和减少交通影响，使它们成为更宜人的交通走廊（SP7）。
-认识到各种开发影响需要从累积的角度来处理（包括空气质量、反社会行为和交通拥堵）（SP9）并管理累积影响，通过设置数字限制来针对赌博店、外卖店和夜间留宿旅馆（SP10）。

We are concerned that:

-设计质量在计划中不一定会在实施方案中实现。
-儿童和年轻人的游乐和非正式娱乐设施，以及它们在健康生活和公共空间激活中的作用目前在本地计划中没有得到关注。
o Buildings that many would regard as ‘tall’ currently do not fall within the scope of the policy due to the ‘relative to context’ definition deployed.
o The indicative height suitability matrix in Policy SP4 appears to be out of kilter with development realities concerning the location, feasibility, viability and design acceptability of tall buildings.
o Some terms in the tall buildings policy are subject to a wide variation in their interpretation undermining its strategic intent; tall buildings appear to be the default proposition for most sites.
o Trees and Woodlands are an underspecified component of ‘successful places’ in terms of their impact on quality of life and air quality and as natural place-making assets.
o Some of the borough’s town and local centres are underperforming as places and components of their neighbourhoods, but it is difficult to effect change without large scale development and associated wider investment.
o Some roads that are in practice or are intended to be, key movement corridors, are missing from the list in policy SP7, notably Vicarage Lane (E15), Freemasons Road, and Balaam Street.
o Some policy criteria could be expressed more clearly to aid implementation: for example, the criteria concerning linear clustering in SP10.

**Implications**

**Local Plan Review will need to:**

1. Continue to emphasise high standards of place-making and urban design with particular reference to town centres and public health, ensuring all components are adequately specified and working in concert with spatial policies and associated site allocations.
2. Examine the appropriateness of the tall buildings policy, ensuring it is working with development realities but also to achieve the strategic intent of the policy and the wider spatial vision.
3. Review all other successful places policies to ensure that they are up-to-date, focussed, concise and comprehensive in light of the issues identified above.
## Options

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<tr>
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<tbody>
<tr>
<td>1. Do nothing more than we already do in policies SP1 to SP10 and others as cross-referenced.</td>
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<th>Pros &amp; Cons/ Justification</th>
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<tr>
<td>Policies, having recently been added to, are comprehensive according to evidence base assessments of the key ingredients of successful places, and are performing well at appeal; continuity can be an advantage. BUT, they have key weaknesses as identified.</td>
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<tr>
<td>2. Amend the tall buildings policy to:</td>
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| a. State that whilst increasing densities in the right locations is generally encouraged, there is a preference for mid-rise densities rather than tall standalone towers, and that as per H1:6, densities should not inhibit the provision of suitable family accommodation. |
| b. Clarify that buildings in Urban Newham will fall within the scope of this policy where they are of 6 storeys or above, and that in the Arc of Opportunity, where they are 12 storeys or above, but that in any case, all buildings will be required to demonstrate high quality design as per the other SP policies. |
| c. Refine the spatial aspects - |

| i. Direct the tallest buildings in the borough to a ‘Canning Town Central’ area close to the station (see map in Part 2 – refined to be the southern core of the expanded town centre and wider area beyond the station to the north and west, not simply the town centre as at present) as a secondary focus, as well as primarily, Stratford Metropolitan. |
| ii. On locations that aren’t Arc Strategic Sites or Stratford Metropolitan/Canning Town Central, clarify that appropriateness will require robust demonstration of: |

| The current SP4 policy is not wholly ‘failing’ |

| b. Clarify that buildings in Urban Newham will fall within the scope of this policy where they are of 6 storeys or above, and that in the Arc of Opportunity, where they are 12 storeys or above, but that in any case, all buildings will be required to demonstrate high quality design as per the other SP policies. |

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| ii. On locations that aren’t Arc Strategic Sites or Stratford Metropolitan/Canning Town Central, clarify that appropriateness will require robust demonstration of: |

| The current SP4 policy is not wholly ‘failing’ |

| b. Clarify that buildings in Urban Newham will fall within the scope of this policy where they are of 6 storeys or above, and that in the Arc of Opportunity, where they are 12 storeys or above, but that in any case, all buildings will be required to demonstrate high quality design as per the other SP policies. |

| c. Refine the spatial aspects - |

| i. Direct the tallest buildings in the borough to a ‘Canning Town Central’ area close to the station (see map in Part 2 – refined to be the southern core of the expanded town centre and wider area beyond the station to the north and west, not simply the town centre as at present) as a secondary focus, as well as primarily, Stratford Metropolitan. |
| ii. On locations that aren’t Arc Strategic Sites or Stratford Metropolitan/Canning Town Central, clarify that appropriateness will require robust demonstration of: |

| The current SP4 policy is not wholly ‘failing’ |
– Good public transport access; and
– Contribution to legibility, place-making (including sensitivity to the local and historic context and place hierarchy) and sustainable communities (notably the ability to achieve neighbourliness as defined in SP8);

Noting that on Strategic Sites, a broad brush assessment of this type has been made and forms part of the site allocation.

iii. Clarify that reference in the policy to ‘good public transport access’ is expected to be a Public Transport Accessibility Level (PTAL) rating of four or above for the part of the site that the tall building is proposed on.

iv. Make reference to the placement of tall buildings so as to secure views through to the Thames, Lea and Roding and parks from public open space including Key Corridors.

v. Alter the matrix ‘Indicative Appropriateness of tall buildings’ to cross reference more detailed site allocations in terms of indicative acceptable heights and the distribution of building height across the site.

d. Clarify and reinforce the design testing to process to:

i. Require detailed designs to be submitted for all tall buildings proposed, and specify that the ability to demonstrate that design quality will be sustained through the execution or realisation of that design across all development phases will be a consideration so that this cannot be altered at a later stage (requiring design credibility, technically and financially, and continuity of the project architect).

ii. Scrutiny of scale, ensuring that it is appropriate not only in terms of local and historic context and character, but also the degree of public transport accessibility, place hierarchy (distinguishing between town and local centres and their hinterlands, and reflecting the town centre hierarchy set out in INF5), and enclosure and integration objectives for Key Corridors and linear gateways.

iii. Emphasise the role of masterplanning and Design Review as part of the demonstration and testing of design acceptability in its objective of managing the location and form of tall buildings to best effect, but refinement of it to clarify intentions in relation to wider spatial strategy, and reduce the scope for inappropriate interpretation contrary to the strategic intent of the policy would seem to be appropriate to address identified concerns.

This includes bringing more buildings that people regard as tall within the scope of the policy, more clearly articulating the preference for other types of higher density design and the importance of prioritising family housing, separating out locational and scalar appropriateness, and refining our position in relation to the likely capacity of certain areas to support tall buildings, making it more site specific and cross-referencing other spatial objectives, including the approach in adjoining boroughs where relevant.

Refined design criteria reflect realities of the assessment process, and up to date advice from Historic England.

An effective plan led approach to location of tall buildings in the borough must at the same time avoid an overly complicated and prescriptive policy.
in relation to legibility and place-making; delete reference to the term 'landmark sites'.

iv. Emphasise the careful assessment of any cumulative impacts in relation to other existing tall buildings and concurrent proposals for tall buildings at adjoining and nearby sites with particular reference to impacts arising from creation of a cluster of tall buildings or an addition to an existing cluster.

v. Include reference to scale, form and massing, proportion and silhouette, facing materials, detailed surface design, and relationship to other structures, impact on streetscape and near views, impact on cityscape and distant views, and impact on the skyline.

3. Support town centre place-quality through allocating new Strategic Sites at gateways in East Ham and East Beckton and being clearer about the opportunities at the Green Street (Queens Market) Strategic Site.

Whilst the cumulative impact of small scale change and other investment channels such as the LIP and Crossrail public realm works are important in achieving the SP6 objectives, identifying larger scale development opportunities which can have a more noticeable 'big hit' and potentially catalytic impact on them due to their scale is also important.

Identifying sites beyond individual ownerships can help encourage more ambitious and better designed (masterplanned) schemes.

4. Edit the Successful Places policies to:

a. Clarify:

i. how excessive linear concentrations will be assessed, making it clear that no more than 2 specified uses in a row will be supported, with the expectation that between such clusters should be at least 2 units (in SP10);

Editing policies in the existing Local Plan would support their implementation to best effect and ensure that they are up to date in relation to the broader policy context, wider corporate initiatives, opportunities and external standards.

Some changes may however make policies
ii. that all scales and types of applications (including advertisements, telecoms, householders) are expected to pass design quality tests (SP3); and

iii. that ‘Secure by Design’ considerations apply to individual buildings as well as the public realm (SP3).

iv. That the reference to ‘realising’ design quality in SP3 will bring design credibility, (technical and financial) and provision for continuity of the project architect into the assessment remit.

vi. That SP8 embodies an ‘agent of change approach’ to noise and disturbance.

b. Add in reference to:

i. Town centre night-time economy opportunities (SP6);

ii. the importance of playspace as part of healthy neighbourhoods and public space for all (SP2, SP3);

iii. trees and woodland as natural assets with specific BS standards to refer to in assessing and managing development impacts (SP5, SP8);

iv. the need to avoid overbearing impact and overlooking of adjoining private amenity space (SP8);

v. Additional Key Corridors: Freemasons Road, Vicarage/Upton Lane; Balaam Street (SP7).

vi Otherwise ensure clarity, focus, conciseness and comprehensiveness in all policies.

marginally longer and more unwieldy.
Key Evidence Base Documents

- LB Newham Engagement Evidence Base (forthcoming)
- Building for Life 2012
- LBN Character Study (2010)
- Shaping Neighbourhoods: Character and Context (2014)
- Streetscape Guidance: A guide to better London Streets
- London View Management Framework
- Housing 2016 (London Plan SPG)
- Social Infrastructure 2015 (London Plan SPG)
- Accessible London: Achieving an inclusive environment 2014 (London Plan SPG)
- Town Centres 2014 (London Plan SPG)
- Character and Context 2014 (London Plan SPG)
- London Planning Statement 2014 (London Plan SPG)
- Preparing Borough Trees and Woodland Strategies 2013 (London Plan SPG)
- Play and Informal Recreation 2012 (London Plan SPG)
- Planning for Equality and Diversity in London 2007 (London Plan SPG)
- The Joint Strategic Needs Assessment (JSNA) ’Adult life in Newham’ 2016 to 2018
- Newham Town Centre and Retail Study 2010 and Update 2016
- LB Newham (2017) Tall buildings: policy evaluation
- Tall Buildings: Historic England Advice Note 4 2015
Questions

- Is there anything that creates and maintains successful and distinctive places in Newham that is not covered in the Local Plan?
- Is it helpful to define what a tall building is in the context of Newham: what is regarded as tall in this context?
- Should tall buildings especially very tall buildings be guided to Stratford and Canning Town, and should tall buildings in general be confined to the Arc of Opportunity and to allocated sites elsewhere in the borough?
- Should mid-rise densities rather than stand-alone buildings be encouraged more in Newham?
- Are the indicative heights for the strategic sites appropriate?
- What width should the Canning Town central area for tall buildings be drawn?
- Should the height of a new building be proportionate to its location in the borough’s hierarchy of town centres?
- Would the creation of large strategic sites in multiple ownership at town centres in the borough help catalyse regeneration?
- Do the proposed edits and additions to the Successful Places policies raise any significant issues?
Theme: Jobs, Business and Skills

Issues

You told us:

- Both new job opportunities (including in and around town centres) and the need for new homes remain key issues.
- Evening and night time activities are felt to be lacking in many parts of Newham, particularly town centres, though there remains concern about safety at night.
- There continues to be a demand for wharf facilities which if provided for appropriately can also yield traffic management and air quality benefits, as well as freeing up land for development.
- NCFE (Newham College) has campus consolidation and enhancement plans, focused on East Ham.
- Major businesses have set out their commitment to the borough by investing in expanded and enhanced premises in the Royals and Beckton.

We know that:

- Employment rates have improved but employment remains an issue in particular amongst those in the aged 17-24 group.
- There is continued demand for viable commercial and industrial uses in the Borough, including ‘last mile’ uses. Vacancy rates on designated employment land in defined premises are low. However there are large expanses of underused employment on SIL land where continuing protection must be reviewed.
- There is a growing demand for the night time economy, tourism and culture uses, some of which are being priced out of more central boroughs; these are important particularly in town centres in terms of shifts away from retail expenditure and to extend activity into the evening and London-wide there is a move to support them beyond the Central Activities Zone to other accessible town centres.
- In Newham in 2016 at least 35% of jobs were secured through S106 for Newham’s residents at the construction phase of major developments and at least 50% has been secured at the operational stage.
Newham College is a major established and well respected FE provider in the East of London; this provides for the majority of training needs in the area in a manner well-targeted at the market’s needs.

The population of Newham and in London generally has increased in recent years, resulting in considerable pressure for housing development and jobs in the borough: land values for residential are almost four times higher than those for industrial.

We Already:

- Have identified a range of employment sites across the borough to support a range of employment uses, from designated employment areas, to employment-led mixed use sites and town and local centres, through to mixed use Strategic Site allocations; many of which sit within employment hubs with identified strengths. In doing so support the role of less high-value activities in the local economy as well as growth sectors (Policies J1, J2 J4).
- Specify spatial strategies for a number of growth sectors including retail, visitor economy and the knowledge economy, identifying a range of employment hubs where agglomeration economies are evident and have further potential (Policy J1).
- Manage the negative impacts of economic growth and night-time economy (Policies SP2, SP3, SP6, SP8, SP9, SP10).
- Have a planned strategy of employment land release to other uses in a managed way; much of this is now in train (Policies J2, J4).
- Seek to tackle worklessness and maximise employment opportunities by improving the borough’s educational attainment and working with developers to ensure local people can access new job opportunities (Policy J3) working in concert with the Council’s employment intermediary, Workplace.

We are concerned that:

- There has been increasing demand for employment land (SIL) to be released for housing, not just on Strategic Sites allocated for release; this needs to occur in a careful, managed way to ensure business needs are met so as to sustain economic growth, without leading to oversupply.
- There is insufficient reference in the plan to the physical infrastructure required to delivery economic growth, notably relating to Communications and Energy.
We may be missing opportunities to attract and strategically manage important growth sector jobs in the cultural and night-time economy, whilst needing to ensure that its negative impacts are managed strategically as well as through development management.

There is limited funding for Further Education provision and this needs to be highly focused to maximise efficiency; local infrastructure developments that most benefit local people are prioritised elsewhere in the Plan to balance housing and other demands on land, but NCFE’s lack explicit policy recognition.

Policy expectations to support employability initiatives and local businesses could be more ambitious to reflect the Council’s commitments, but this needs to ensure that undue viability impacts are avoided.

**Implications**

Local Plan Review will need to:

1. Identify further employment land for release and clarify how this will occur, whilst continuing to provide a sufficient reservoir of sites and land to deliver jobs and business growth.
2. Clarify the opportunities for promoting and managing the cultural and night-time economy as a growth sector and broaden the ambition for the visitor economy.
3. More clearly recognise the pre-eminence of NCFE as a FE training and education provider meeting local needs enabling their ambitions where seen to be of local benefit.
4. Clarify local procurement expectations in relation to development and set out the scale of ambition in terms of access to employment that developers are expected to support, subject to viability testing.
5. Make more explicit reference to high quality communications and energy infrastructure as key components in the creation of high quality business environments to support sustainable economic growth.
6. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.
## Options

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<tr>
<td>1. Do nothing more than we already do as set out in policies J1 to J4 and others as cross-referenced.</td>
<td>Policies, having recently been added to, are a reasonably comprehensive response to jobs needs according to evidence base assessments and monitoring in the context of national and London-wide policy. Continuity can be an advantage, however opportunities exist to address opportunities and threats as identified, particularly so as to ensure that employment land release occurs in a managed way.</td>
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| 2. Strengthen the policy to further promote employment across Urban Newham, responding to newer opportunities:  
  a. Recognising the value of culture as a key component of economic growth including night time uses, directing these uses (i) towards all town centres (reinforcing established cultural quarters where possible) in a scale proportionate to their function, in line with J1, INF5 and SP6, or (ii) other than smaller scale food and drink uses, to Stratford, East Ham, Green Street and Canning Town only.  
  b. Explicitly promote space for and support small scale cultural workspaces (such as publishing, tv/film production and artist studios) in LMUAs and MBOAs, certain strategic sites, and where appropriate, CFOAs,  
  c. Further promoting tourism and visitor economy facilities beyond the Royal Docks, (refined to refer to Strategic sites and the airport and ExCeL employment hubs) Stratford Metropolitan and Green | Given the opportunities presented by trends in the cultural, night-time and visitor economy, it makes sense to more positively embrace them whilst managing them strategically to deal with negative impacts in a way that enhances existing policy protections (currently the policy position can be seen as disproportionately negative by not reflecting the opportunities). This would complement broader Council programmes that promote musicianship and theatre-going amongst young people. Policy options seek to recognise the existing and potential range of formal and informal cultural, visitor and night-time activity and spaces and direct them to suitable locations across the borough: town centres which are best equipped to absorb transport, public safety and noise impacts, either all with a scale proviso, or to those with a borough-wide function or above and appropriate night time tube and/or bus access; LMUAs and MBOAs which should provide for more affordable workspace opportunities amidst a stimulating mixed use context; and Strategic sites and employment hubs that have developed/can be masterplanned with such uses planned in.  
  The policy may further recognise the ‘agent of change’ principle (secured by legal agreement) to support existing viable businesses and growth, securing compatibility between the two, complementing existing policy in SP8 and as set out through proposed and existing site allocations. As part of this, the policy will place the onus on new development to secure compatibility with existing uses through measures to address environmental impacts such as noise. This reflects wider support for this principle at the London-wide and |
Street to (i) in the case of hotels and visitor accommodation, other town centres on a scale proportionate to their function and character, or (ii) as for (i) but for all visitor economy facilities, not just hotels or (iii) as for i) but to Canning Town and East Ham only in addition to those already specified.

d. Recognise the ‘agent of change’ principle to support compatibility between existing and new uses.

e. Make reference to and support the expansion of electronic communications networks and energy infrastructure.

3.

| a. | Release further industrial land at Thameside East & West, Beckton Riverside, and on a minor scale at London Industrial Park and Cody Road using the existing managed release criteria set out in J2 and J4 coupled with spatial policies and site allocations which reflect evidence based on demand. |
| b. | Allocate additional LMUAs at Beeby Road, Atherton Mews and Esk Road and explore a mixed use designation at Bridge Road depot site (see Part 2 for mapping). |
| c. | Amend the boundary of Nursery Lane LMUA to include further Romford road properties and part of the existing LIL that is not in active bakery use. |
| d. | Amend part of Stephenson Street LIL to |

The Local Plan sets out to ensure the supply of industrial land to meet future economic needs and functional requirements through planning, monitoring and managing the protection and release of surplus industrial land so it can best contribute to strategic and local planning objectives. Currently the Local plan protects over 300ha of SIL land and much of it, and smaller industrial sites remain healthy due to the persistence of long-standing sizeable local employers (e.g. Tate and Lyle, Britvic, Nuplex) and continued demand for ‘last mile’ locations servicing inner areas. However, there are a number of areas where land is under-used or vacant and has been for some time, and national policy requires that protection of these sites should be reviewed with a view to release to other uses. The Employment Land Review Part 1(supply side) undertook this from a qualitative perspective, identifying options for release and further allocation based on these criteria plus spatial considerations such as adjoining uses, infrastructure plans, public transport accessibility, and the intentions of major employers, recommending a number of options which have been carried forward into proposed site allocation options.
Briefly, at London Industrial Park and Cody Road employment areas are performing well, but minor release options are proposed adjacent to Strategic Sites so they can be re-developed in a coherent way as part of them, ensuring modern fit for purpose employment-generating floorspace. In Cody Road, it is proposed to incorporate some of an adjoining LIL within the SIL given limited differences between it and existing SIL.

At Thameside East, there are under-used low grade sites at the western and eastern ends of the area, book ending the large local employer, Tate and Lyle which is investing in its plant, and a healthy modern industrial estate (Standard Industrial Estate). These areas have the best public transport and local connectivity, and are adjacent to significant residential development – either planned or built. Any site allocation could acknowledge the small area more fine grained mix of employment-generating uses in and around Brick Lane Music Hall and well performing St Mark’s industrial estate.

At Thameside West, Nuplex and Tate and Lyle are remaining in situ, and Peruvian wharf is being re-activated for aggregates use, with proposals for an expanded consolidated wharf centred on it, (releasing land for development around Thames Wharf, an existing Strategic Site with passive DLR station provision) requiring appropriate buffering. These uses provide significant strategic anchors to the industrial area, but land at either end of the area, adjacent to other strategic sites or intended to create more residential-led environments in proximity to DLR stations and that is relatively under-used could also logically be carefully released, at the eastern end, making better use of Lyle Park. Given proposed release elsewhere, under-used land at the heart of the area could be best redeveloped for further employment-generating uses complementing the wharf and surrounding industrial uses.

Atherton Mews is proposed as a LMUA given a similar context to Sprowston Mews which is already a LMUA (but currently with fewer employment-generating uses) if the road can be opened up and adopted. Beeby Road is proposed LMUA given its present mix of low impact employment-generating uses and scope for intensification, while expansions to the Nursery Lane
LMUA reflect the existing mix of employment-generating uses, key corridor and edge of town centre location and better scope for intensification if more land is included. Esk Road is proposed as a LMUA as it presents an opportunity to make better use of the existing site and improve the compatibility with the surrounding residential area. Bridge Road depot is currently a LIL in which these options seek to re designate as a LMUA to better reflect the residential area surrounding the employment land or an alternative housing allocation at this location.

It should be noted that these options will be refined based on consultation responses and further technical evidence currently being commissioned concerning market demand, so that we can work to ensure that business needs are appropriately provided for in what we specify through site allocations as well as remaining protections. These will complement the recently strengthened policy concerning 'managed release' (J4 adding to J2 requirements; SP8 bolstering assessment of neighbourliness) reflecting the overall promotion of a mixed use borough.

4. Strengthen the policy to ensure access to employment is better secured through the planning process:
   a. by specifying a uniform target (with associated financial contributions subject to viability testing) of at least 50% of new jobs created by a scheme to be occupied by Newham residents through appropriate funding for the Council’s employment intermediary or successor bodies and other endeavors.
   b. as above, but specifying a lower target (35%) for construction phase jobs with at least 50% for post-construction, with more expected of expanding local The pursuit of convergence for local residents is a key premise of the pursuit of development opportunity, including release of land previously protected for industrial use. It is expected, as per existing policies (notably S1, J4) that each development maximises its contribution to convergence, and employing local people and making use of local suppliers is key component of that. These principles are already reflected in policy (notably S1 and J3) but could be supported by targets and more explicit references to local procurement to better focus negotiations and commitments. The targets suggested reflect the experience of negotiation on such points that the Council’s Economic Regeneration team have achieved in recent years, with any financial contributions to help achieve such commitments being subject to viability testing.

Giving NCFE more explicit policy support should help them realise the
c. by specifying that these targets and reporting against them would be expected over all phases of development and the operational lifetime of a scheme
d. Specifying expectations of local procurement as per S1, in policy J3
e. More explicitly supporting the pre-eminence of NCFE as a local vocational qualification provider, alongside reflecting their campus consolidation and enhancement plans.

5. Other amendments as seen to be necessary to clarify and update the policies, including:
   a. Removing training facility spatial strategy from J3 to rely on that more clearly specified in INF8 and 10.
   b. Clarify and strengthen J3.2 ensure that employability prospects of all should be improved, regardless of mental health and disability status.

These would help to support the correct implementation of policies so that they work to best effect.

Removing the training facility strategy from J3 would clarify the position on training facilities being aligned with that of other community facilities, whereas the present policy is slightly at odds with it in referring to accessible non-town centre locations. Reference to training facilities in empty offices is also unlikely to be relevant now given new Permitted Development rights allowing offices to be converted to higher value uses.

Clarify in J3.2 that the policy intention is to improve the employability of all Newham residents including those with specialist health issues such as mental health and disability (also part of healthy neighbourhoods SP2.3).
**Key Evidence Base Documents**

- LB Newham LPR Engagement Evidence Base (forthcoming)
- GLA Industrial Land and Supply Economic Study (2015)
- GLA Industrial Land Demand Study (2017, forthcoming)

**Questions**

- Are we doing enough to protect/support existing businesses and allowing them to expand across the borough?
- Are there any other ways to support/improve local level employment opportunities for Newham through the planning process?
- How should the relationship be managed between employment development (and protection of) and housing development?
  - More specific requirements on mixed use sites for employment generating uses?
  - Clarity on the typology of space that sit well with housing?
- Should we encourage the support for establishment and expansion of cultural/creative uses including cultural hubs? And how should we go about this (town centres/LMUAs CFOAs?)
- Should we continue to direct tourism towards the Royals or Stratford or look to recognise the greater demand for accommodation for tourism across the borough in areas with high accessibility to public transport?
- Is there anything else planning can do to support economic growth?
Theme: Homes

Issues

You told us:

- A continuing supply and choice of good quality, safe, secure, affordable homes are needed in Newham.
- Many of you are satisfied with your accommodation in Newham, however in terms of housing quality. Those that live in the Private Rented Sector (PRS) are less likely to be satisfied.
- Lack of affordable and family-sized housing, including some kinds of specialist housing are key reasons for people moving out of the borough and people living in over-crowded conditions or accommodation otherwise unsuitable for their needs.

We know that:

- The population of Newham has increased in recent years and is projected to rise by around 50,000 people during the plan period, resulting in considerable pressure for development in the borough.
- The identified housing need across all sizes, types and tenures (including specialist housing) is for 2590 homes a year, up until 2033.
- The London Plan (2016) has set a delivery target of 3076 homes per annum in LBN (including the LLDC area) up until 2025, which includes provision for growth from beyond the borough.
- Newham can demonstrate a 5 Year Land Supply and is attracting investors to bring forward development; though the delivery of homes has increased substantially since the economic downturn, average delivery since 2013 has totalled 2390 units per year.¹
- The need for affordable and family housing (3 bedroom or more) remains high within the borough and in a pressurised housing market, it is essential to ensure that the delivery of different types, tenures and sizes of homes is achieved in accordance with local need and that quality standards are adhered to.
- PRS housing now accounts for the largest housing sector in Newham, with home-ownership decreasing; those aged between 16 – 34 are substantially more likely to rent from a private landlord.

¹ As per para 47 of the NPPF.
Newham contains approximately 10,000 HMO properties, around half of which are currently licensed through the LBN licensing scheme.

The role of purpose-built PRS housing at scale (i.e. multiple units in dedicated blocks) within the market is growing. It can help with scheme viability as part of the housing mix, but has other distinct economies and design and management affecting delivery mix and timing.

London Living Rent is likely to become an increasingly important product, in terms of fulfilling certain types of housing need in London.

We Already:

- Allocate a number of small and large scale sites across the borough to support housing delivery (H1, H5 and the spatial policies).
- Seek to deliver a supply of well-designed quality accommodation of appropriate densities; that achieves internal and external space standards across all types and sizes (SP2, SP3, H1, H6 and spatial policies).
- Require 39% of all new homes are 3 bedroom family units, (subject to mix and tenure considerations) prioritising family-sized housing over smaller units (H1 and the spatial policies).
- Recognise that a mix of tenures is essential, and on sites with a capacity to deliver above ten units, seek between 35% - 50% affordable housing, of which 60% will be social housing (typically now, affordable rent) except in Canning Town and Custom House regeneration area where 50% of the affordable housing will be social rent and the rest intermediate (H2).
- Support the delivery of quality specialist housing, including purpose built HMOs in the right locations, subject to adequate needs based justifications (H5, H7).
- Seek older persons’ housing as part of the housing mix on Strategic Sites (H5).
- Prevent the loss of housing of all types and ensure that larger units of 3 bedrooms or more are not converted to flats, short-term lets or Housing in Multiple Occupation (HMOs) (H4).
- Encourage the de-conversion of flats to family dwelling houses, and of out of centre ribbon development of commercial and community uses to housing (H4).

We are concerned that:

- A number of housing products coming forward contain no housing mix; the policy position concerning housing mix beyond family housing provision could be clearer.
- The Strategic Site family housing typologies do not sit comfortably with the 39% family housing target.
Given that both affordable and family housing are subject to viability testing, the priority given to each is unclear.

Much time is spent in negotiating affordable housing provision on schemes with unjustifiable starting offers, eventually through discussion reaching figures that respond to affordability targets.

We need policy to acknowledge the market role of purpose-built PRS housing in terms of meeting a particular housing need and scheme viability with its own distinct economics, whilst ensuring that it does not prejudice the delivery of family and affordable homes.

Whilst we encourage de-conversion of flats to family homes, we don’t likewise encourage the de-conversion of small and large HMOs to family homes.

Planning Inspectors have suggested through appeal decisions that a small number of 3 bedroom dwellings should be released as they are arguably less suitable in their location or configuration for occupation by a family.

In spite of an identified need within the borough and minimal new build delivery, a small number of larger homes (4 bedroom or above) are vulnerable to loss through conversion, where a 3 bedroom unit is proposed.

The definition of housing protected by policy H4 could be made clearer to emphasise for example, that it includes all lawful provision (in planning, building regulations and Housing Act terms).

Intermediate housing products are not well understood by the public and the current description within policy documents does not reflect new developments in the market, such as London Living Rent and Starter Homes.

It may not be clear that we have a generally positive approach to windfall sites although we only explicitly allocate larger ones.

**Implications**

**Local Plan Review will need to:**

1. Ensure a continued supply of specialist and conventional, affordable and market housing, to meet identified needs in the most effective way.
2. Refine and clarify policy in respect of the protection of housing, conversion of family-sized dwellings and de-conversion of HMOs.
3. Acknowledge and manage the role of the growing purpose built PRS market in housing delivery.
4. Revisit residential site allocations to reflect changes in the development context and to identify new sites with potential for residential development and associated indicative density and family housing typologies.
5. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.
### Options

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<td>1. Do nothing more than we already do in policies H1 – H7 and others as cross-referenced.</td>
<td>With a number of policies having recently been introduced, overall the Local Plan’s housing policies provide a comprehensive framework for the provision of quality homes of varying types, sizes and tenures, and are performing well at appeal. Whilst continuity can be an advantage, policies may fail to adequately account for anticipated market changes, as identified, potentially missing future opportunities to harness the benefits of development and growth and manage more challenging aspects to best effect.</td>
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<tr>
<td>2. Reinforce policy that will ensure a continued supply of housing to meet local need, by:</td>
<td>Population growth and projected housing need; will continue to put pressure on London’s future housing market, thus it is essential to ensure a continued supply of new homes of all types, sizes and tenures. Since the adoption of the Local Plan: Core Strategy there has been little change in the local context and there remains a substantial need for both affordable and 3 bedroom family units (across all tenures) within the borough. Ensuring a balanced delivery generally, and in particular between these two key priorities, will continue to be a challenge impacted by viability, and although drastic alterations to current policy are not necessary, some amendments may assist in providing further clarity for policy implementation. Establishing a clear policy preference in terms of the delivery of key priorities and any other preferences in relation to overall mix (to tackle the problem of churn), may assist the development management process to expedite the delivery of policy compliant schemes. However this may present some risk to achieving a broader balanced delivery, in accordance with need. Acknowledging that calculating a 39% family provision on applications below 3 units is difficult in practice and that viability often renders family housing delivery on schemes below 10 units difficult, the percentage requirement could be applied to schemes of 10 units or above, only. This in turn would mean that viability testing on family provision will run parallel with that of affordable, removing the need to interrogate schemes which, more often than not, fail to result in high yields of larger units, providing further</td>
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opportunities for the delivery of some smaller homes that meet other types of demand. In addition, the removal of the varying levels of family provision within the housing typologies described in policy justification and applied to Strategic Sites, would clarify the Council’s expectation that all sites should be contributing to meeting the 39% family housing target.

3. Refine the affordable housing policy to:
   a. Retaining the existing policy position of targeting 35 – 50% affordable housing subject to mix and tenure considerations, but:
      i. Introducing a minimum requirement (likely to be around 25% depending on the outcome of Local Plan viability assessment) across the borough; or
      ii. Introducing a minimum requirement in certain areas of the borough (likely to be around 25% depending on the outcome of Local Plan viability assessment).
      iii. Introducing a minimum requirement that varies across the borough according to viability testing.
      iv. Introduce these requirements upon plan adoption, or incrementally during a transition period.
   b. Ensure that intermediate housing products including London Living Rent housing, are adequately described and promoted within policy, as part of delivering a range of products capable of fulfilling intermediate affordable housing need.
   c. Ensure that sites deliver at least 10%Recognising land value increases within the borough, the introduction of a minimum affordable housing floor on all schemes above 10 units would assist us in achieving the strategic objectives of 50% affordable housing delivery across the lifetime of the plan; recent experience suggests that 25% would be an appropriate figure but we will be guided by Plan viability testing to ensure that this does not have disproportionate viability impacts affecting Plan delivery. This could be applied across the whole borough, or within targeted areas. A transition period where the floor is gradually increased may help support appropriate market adjustment.

This policy would mean that any proposal that doesn’t start from a position of the proposed floor at application stage would be regarded as a departure from the development plan, which is a serious proposition in a plan-led system. As such, doing so should help to ensure that a site’s full development cost is taken into consideration at the earliest opportunity, (i.e. that developers do not over-pay for land and land values adjust over time) expediting the delivery of policy compliant schemes by avoiding the stage of negotiations that typically arrives at least at this figure.

Affordable housing provision above this floor, up to the upper limit of the policy target, would still be subject to mix and tenure considerations, requiring site-specific viability testing, and typically, the application of review mechanisms and/or off site-payments.

A number of products are available on the market that, are designed to address intermediate need, and it is essential that policy responds to this changing market to ensure that opportunities for delivery aren’t missed. First,
intermediate home ownership products. in accordance with the proposed NPPF changes highlighted in the government’s recently published Housing White Paper\(^2\), it may be necessary to clearly set out in policy that 10% floor on intermediate products is required across all sites. Second, London Living Rent accommodation is an emerging intermediate affordable product across the capital that seeks to enable households with around average earnings to save for the necessary deposit to purchase their own home, by charging low rents on time-limited tenancies. Aimed at individuals and couples over shared multiple adult households (who are likely to exceed the maximum income threshold of £60,000), rent rates are based upon local benchmarks (one-third of median gross household income for the borough) and vary based on house size. The product will fulfil and important need within Newham, allowing those who do not have access to existing intermediate products such as shared ownership (i.e. households without a deposit) to achieve owner occupation over time.

4. Clarifying and refining the policy concerning the protection and management of existing stock by:

a. Either:
   i. Clarifying that large units (4 bedrooms or above) are protected from conversion/ subdivision even if this would result in the delivery of a 3 bedroom family home; or
   ii. Allowing subdivision/ conversion of large units provided that the resulting new homes are all 4 bedroom plus units in C3 use, and at least 45 sqm of private amenity space that is also at least 4m in width, is provided; or
   iii. Allowing subdivision/ conversion of large units where at least one 5+ bedroom unit is provided, with at least

The need for homes of 4 bedrooms and 5 plus bedrooms across the borough, whilst smaller than other sizes, is not insubstantial, thus any existing large units (4 bed plus) should continue to be protected, as part of ensuring a broad market offer, especially as units of this size are rarely proposed as part scheme mix within new developments. Taking account of an appeal\(^3\) decision where a large unit was lost in favour of a 3 bed unit delivery, it may be necessary to strengthen policy, clarifying that this in itself is not enough of a justification for property subdivision or conversion. It is however recognised that some 4 bed plus units may either be large enough or designed in such a way that conversion or subdivision could still enable the supply of other large family units, more aligned with market demand, and may help support viable conservation work in large conservation area properties. Options scoped reflect the possibilities for conversion where this is the case, provided that decent amount of amenity space, suitable for family use, is safeguarded to mimic the typical provision for a 3 bedroom home in Urban Newham, maintain character, and avoid the over-extension of houses into gardens being a justification for conversion.

In line with the protection of 3 bedroom plus family homes from loss through

\(^2\) Fixing our broken housing market (Feb 2017).
\(^3\) 16/00137/REF
45 sqm of private amenity space, that is also at least 4m in width.
b. Support the de-conversion of HMOs to family dwelling houses.
c. Reinforce the need for the protection of 3 bedroom family homes from further loss via conversion or subdivision in all circumstances.
d. Defining what is meant by the terms ‘housing’ and ‘quality hostels’.  
Conversion or subdivision (to ensure an adequate supply), it is a pragmatic approach to also provide support within policy for the de-conversion of HMOs to family dwelling houses.

Recognising challenging appeal decisions and continuing support for the protection of family homes and large existing stock of HMOs, it may be appropriate to clarify their protection, highlighting the policy position that promotes new family housing everywhere, so no locations are seen to be ‘less suitable’ (although policies are working to improve suitability) and that the preferred focus is on purpose-built HMOs and flats which can better achieve quality design and management requirements. This would clarify for example, that quality amenity space is all the more important for HMOs (as set out in policy SP8) given the intensity of internal living conditions, and that we understand that there are a variety of family-sized household types, with varying locational/accommodation preferences, some of whom are willing to trade off the lack of amenity space for a convenient location.

Whilst existing policy takes a catch-all approach to housing protection and stock management, for clarity it may be useful to confirm that whilst any listing is not exhaustive, ‘housing’ refers to any lawful accommodation as defined by legislation (including Planning and Housing Acts and Building Regulations) and ‘quality hostels’ are those that meet such quality standards expected of any new proposed provision, as defined by policy.

5. Introduce policy that specifically relates to purpose built PRS housing and stipulates that:
   a. Purpose-built PRS for single household or HMO occupation will be acceptable as part of the housing mix on Strategic Sites as well as the locations identified in policy H7.
   b. Purpose built PRS provision should come forward as part of a broader site housing mix, where onsite Family and Affordable Housing provision remain a priority, however:

Existing policy around PRS, given the level of HMOs across the borough, has been focused on small scale models where typically a landlord owns one or more HMOs or single dwelling houses and rents them out individually on assured shorthold tenancies. In Newham, this has often resulted in loss of family dwelling houses and an increase in churn and associated problems, which existing policies have sought to address, encouraging purpose-built HMOs and conversions from non-residential stock in town centres and along key movement corridors where multiple occupancy can be better supported and absorbed.

Policy is now required that speaks to the market role of purpose-built (and often larger scale) PRS in terms of meeting specific housing needs. As this
i. offsite family and affordable provision may be acceptable where onsite is demonstrated to be undeliverable, and where it is agreed that such affordable and family units will be delivered before or in line with the PRS housing;

ii. offsite contributions may be acceptable where onsite or offsite provision is proven to be unfeasible, provided that these are proportionate and financially neutral; and

c. dual viability submissions will be necessary, incorporating both the built for rent and build for sale financial appraisal.

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6. Introduce policy criteria that, specifically supports housing delivery from the development of small scale ‘windfall’ sites, not already

| Model assumes a long term view of housing supply, more purpose build housing developments will now remain in single ownership, invest in broader area place making, and offer longer term secured tenancies as part of a competitive rental product. This in turn should assist in providing qualitative improvements in housing quality, ensuring increased tenant satisfaction within the borough.

The PRS market, unlike mainstream market housing for sale, relies on annual revenue streams to deliver. This requires Local Planning Authorities (LPAs) to recognise the distinct economics of the sector in relation to viability, to ensure that the maximum gain from new development can still be harnessed for residents of the borough. As part of ensuring policy compliant proposals, options seek to welcome PRS products as part of a broader delivery on larger scale sites, maintaining the position that onsite family and affordable homes are a priority. In this context, onsite may mean within the boundary of the wider Strategic Site, as opposed to any smaller red line boundary associated directly with a PRS proposal. Whilst it is still possible to achieve onsite affordable housing on PRS schemes, lower returns from build to rent compared with build to sell, may make it necessary to for LPAs to approach viability analysis from a different angle, carefully considering the appropriate level of planning obligations and when these should be made throughout a schemes lifecycle. For example, given the financial model, it’s likely that lower levels of upfront family and affordable housing will be possible, but that further units could be achieved over the longer term.

To this end, it is essential that policy is introduced that speaks directly to this model, facilitating PRS schemes without impeding the Council’s ability to achieve family and affordable housing provision (proportional to that gained from market sale development), and ensuring that during the development management process, consideration of factors such as adequate claw-back mechanisms and finance contributions are capable of being made.

| Whilst the vast majority of housing delivery anticipated to come forward in Newham throughout the plan period will be on large scale strategic sites, a minor percentage of overall unit completions arise from small scale sites that |
allocated by the Development Plan, cross-referencing other policies as necessary.

have not already been identified for their housing potential by Local Plan documents due to their size. In recognition of these sites’ role in housing delivery and in accordance with the government's recently published Housing White Paper, a policy reference is proposed to assist in facilitating their development, allowing for the maximisation of housing delivery from all possible land sources, regardless of size or potential capacity.

7. Review and update residential (strategic and non-strategic) site allocations and identify any new sites deliverable for residential development.

To boost the delivery of new homes across the borough is it necessary to assess any newly identified sites (above 0.25ha) for their suitability and availability residential development allocation.

To ensure that existing housing allocations are fit for purpose, it is also necessary to undertake a review and amend existing allocations (where necessary) that respond to any changes to the development context.


8. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.

Editing policies in the existing Local Plan would support their implementation to best effect and ensure that they are up to date in relation to the broader policy context, wider corporate initiatives, opportunities and external standards.

Some changes may however make policies marginally longer and more unwieldy.

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**Key Evidence Base Documents**

Questions

- Are we doing enough to facilitate the delivery of an appropriate mix of quality accommodation that meets the needs of Newham’s residents? Should we:
  - Prioritise family over affordable housing or vice versa, or continue to prioritise both?
  - Introduce an affordable housing minimum (floor), in addition to retaining the existing policy targets?
  - Allow subdivision/ conversion of very large houses, provided that they yield family homes?
- Should we be introducing specific policy to manage the delivery of purpose-built PRS?
- Are there any other housing related issues that we should be considering beyond these and those already in the Plan?
Theme: Sustainability & Climate Change and associated infrastructure (green, blue, energy, waste)

Issues

You told us:

- That you want to feel safe in your homes and businesses.
- That having access to reliable transport is important.
- That a significant portion of household income is spent on fuel.
- That household and business waste not stored and presented properly is a frequent source of frustration and complaint.
- That you want more and better-quality green and open spaces.

We know that:

- Air quality objectives are not being met in Newham or across London.
- London will get hotter and dryer over time, worsening the effects of poor air quality and increasing demand for water despite already pressurised supply.
- With more than half of Newham in a higher risk flood zone, flood risk management is vitally important.
- The Lea River Park has the potential to uplift and transform the western boundary of the Borough, improving north-south and east-west connections and access open space in many areas where it is lacking.
- London is an energy stress zone requiring investment in infrastructure and efficiency to ensure supply can keep pace with growth.
- Waste apportionments have decreased since 2012, meaning the East London Waste Authority area is expected to handle less waste than planned for in 2012.
We already:

- Promote adaptation to the changing climate through improved resource efficiency in buildings (including energy and water) and through use of passive solar design, sustainable urban drainage systems, living roofs and enhanced greening to combat heat island effects (SC1).
- Require adherence to London Plan carbon targets and promote retrofitting for improved carbon efficiency and the development of heat networks and on-site renewable energy sources (SC2 & INF4).
- Address flooding by requiring flood risk assessments and applying the sequential test, protect space for the maintenance of flood defences, requiring improvements to surface water run-off and demonstration of viable drainage strategies, and through having a presumption against hardstanding in open spaces and domestic gardens (SC3 & SC5).
- Expect enhancement of a site’s biodiversity offer, require Biodiversity Statements on certain scales of development, permit development only where harm to habitats and species is avoided, protect SINCs, and promote greening of sites and the enhancement of waterways (SC4 & SC5).
- Promote innovative approaches to waste management, safeguard operational sites needed to meet the area’s waste apportionment, and ensure waste facilities support the waste hierarchy (INF3 & SC5).
- Protect and enhance green infrastructure and the blue ribbon network, supporting increased use where appropriate with a range of important sites specifically addressed (INF6 & INF7).

We are concerned that:

- Whilst Local Plan policies are intended to be crosscutting, the way the plan has evolved has led to some issues being dealt with in multiple places, possibly creating a lack of clarity regarding requirements.
- Some aspects of sustainable development such as air quality, construction waste management, and the need for buildings to be adaptive are not sufficiently prominent in the plan.
- Whilst energy efficiency and sustainable energy generation is sought though policy, the absence of in-built monitoring apparatus makes it difficult to know whether developments are delivering the levels promised.
- The potential of district heating and cooling networks is not being realised; this may include making use of the Royal Docks and River Thames as means of heating and cooling (via heat pumps).
Energy infrastructure needs to evolve to meet the needs of businesses and a growing population but requirements (other than those related to local heat networks) are inadequately specified in the plan; this is also the case with telecoms infrastructure despite its impact on ‘smart’ (more energy efficient) working and living.

Up to date information on flood risk needs to be reflected in policies; whilst we also need to encourage as shift away from a reliance on car-parking at ground floor as a response to flood risk which creates ‘dead’ spaces without active surveillance and a lack of variety and interest at ground floor.

In assessing the protection and enhancement of biodiversity, there is no standardisation in the way biodiversity value is assessed; moreover resilience to climate change is not specified in the design of enhancement schemes.

Site specific open space requirements linked to strategic projects such as the Lea River Park and other aspects of quality and accessibility are inadequately specified and some elements of green infrastructure require adding to the existing schedule for protection to reflect its strategic intent.

**Implications**

**Review will need to:**

1. Increase the visibility of air quality issues and requirements.
2. Reinforce the fact that sustainable design practices are expected, vital, and in some aspects non-negotiable, with all forms and scales of development contributing, making better use of technologies and other opportunities to improve their effectiveness and cost efficiency.
3. Incorporate recommendations and findings of the updated SFRA, associated infrastructure requirements and encourage more innovative design responses to flood risk.
4. Ensure all appropriate green infrastructures are protected and establish standardisation in the way its offer (specifically with regard to biodiversity) is assessed and valued.
5. Ensure energy infrastructure requirements in addition to the heat network are adequately specified in the plan, along with telecoms.
6. Ensure that cross-cutting policies are not creating overlap that causes confusion about requirements and otherwise review policies to ensure that they are up-to-date, focussed, concise and comprehensive in light of the issues identified above.
### Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Pros &amp; Cons/ Justification</th>
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<tbody>
<tr>
<td><strong>Overarching</strong></td>
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<tr>
<td>1. Do nothing except reorganise and integrate policies to reduce overlap / provide clarity about requirements.</td>
<td>SC policies, having recently been added to, address the range of key sustainability and climate change issues and are reasonably well used; continuity can be an advantage and re-organisation will address minor issues of use. This approach does not however address the additional weaknesses identified.</td>
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<tr>
<td>2. Re-visit the viability of BREEAM non-residential and Zero Carbon residential development in Newham as part of broader viability testing.</td>
<td>Given the need to test the viability of the plan, it makes sense to re-visit the viability of these policy requirements and the caveats to their implementation in SC5 to ensure that sustainable design opportunities are maximised.</td>
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<tr>
<td><strong>Flooding &amp; Drainage</strong></td>
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<tr>
<td>3. Strengthen the plan’s response to flood risk by:</td>
<td>The need to respond to the threat of flooding is not optional, as we have frequently seen in recent years across London and the UK, floods do happen and severity is likely to increase. It is essential for the development industry to respond to the realities of the time and location it operates in, creating buildings that are truly fit for purpose. The design and construction of new development provides by far the best opportunity to improve the flood resilience of buildings and places given that most large development sites fall within areas of flood risk so there is no sequentially favourable (lower flood risk) alternative to building on them.</td>
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<tr>
<td>a. Incorporating recommendations of the updated SFRA;</td>
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<td>b. Establishing in principle support for flood defence improvements, subject to compliance with other relevant policies.</td>
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<tr>
<td>c. Clarifying design requirements in Flood Zones 2 and 3 by specifying that in addition to the appropriate siting of vulnerable uses above ground floor level, we encourage the deployment of smart design including:</td>
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<td>i. locating a broader range of less vulnerable uses at ground floor (storage and utility rooms, ancillary living space (excluding bedrooms) such as studies and garden rooms, utilities e.g. grey water and refuse storage, bike parking, employment-generating uses where in accordance with the spatial strategy), and</td>
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<td>ii. using build specifications and materials at ground level that can accommodate and withstand flooding (raised floors, elevated utilities, flood resistant membranes etc.).</td>
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<tr>
<td><strong>Energy</strong></td>
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4. Make clear that applications for development that will increase the capacity of energy and telecoms infrastructure where there is an identified need will generally be supported, subject to compliance with other relevant plan policies. INF4 already expresses support for expansion of local heat and power networks; however there may be other forms of development such as sub-stations needed to maintain utilities sufficiency in certain parts of Newham.

5. Promote the use of open water heat pumps by:
   a. Expressing a general support for their use; The National Heat Map: Water source heat map layer produced by the Department for Energy & Climate Change (DECC) in March 2015 shows the substantial potential for heating and cooling that the Thames Estuary provides, as viably demonstrated upstream elsewhere in London. Making use of this resource would reduce reliance on the grid for heating and cooling and would be a significant boost to the resilience of Newham in a fluctuating energy market. Consideration would need to be given to whether such solutions would have any unacceptable impacts on the ecology of the River or Docks.
   b. Specifying that major developments within 500m of open water (the Royal Docks or River Thames) should investigate the feasibility of using heat pumps.

6. Improve the delivery of decentralised energy by requiring the construction standards of the London Heat Network Manual and specifying the vicinity within which major developments should connect to heat networks;
   a. Within 1km of an existing network, connection must occur before occupation. Referring to the standards set out by the London Heat Manual should ensure that connections are fit for purpose, something it is hard for Local Planning Authority officers to do when those connections are not being made live at the time of granting permission.
   b. Within 1km of a network scheduled to be operational within 3 years of the grant of planning permission, connection should be provided for and the arrangements facilitating it explained. Being specific about the radius in which connection is expected has both drawbacks and advantages, whilst it helps to ensure proper consideration is made in some areas, it may discourage connection outside of these areas even when viable and feasible.
   c. Within 500m of a potential network as per the London Heat Map, connection should be provided for.

7. Introduce a requirement to incorporate low-cost energy use and generation monitoring apparatus into major new development. Given that such equipment can be incorporated into new development at no more than the cost of a standard meter, and that reporting can be automated via computer systems, such a requirement would be expected to bring substantial benefits with little additional burden on the resources of developers or the planning authority. Better monitoring of the production and use of
### Air Quality

8. Create a standalone policy that promotes air quality improvements by:
   a. Drawing together and being clearer about existing requirements including (from SP2, SP8, SP9, SC5):
      i. Refusing the grant of planning permission unless it is demonstrated that emissions from the construction process will be minimised and controlled;
      ii. Avoiding an increase in specified pollutants within AQMAs and requiring mitigation where developments increase exposure in those areas;
      iii. Requiring Air Quality Impact Assessments with certain proposals.
   b. Adding to the above by:
      i. Requiring all development to at least deliver an ‘air quality neutral’ standard;
      ii. Requiring schemes that include outdoor space to consider positioning in relation to pollutant sources (roads);
      iii. Requiring additional mitigation (such as the provision of trees) in new ‘sensitive receptor’ uses such as housing and schools.

   Whilst the Local Plan already makes requirements regarding the consideration of air quality, it remains a challenging issue that warrants more strategic attention.

   Requiring additional mitigation from ‘sensitive receptor’ uses is problematic as these are much needed forms of development that are, by and large, not the causes of poor air quality. The challenge is in improving air quality without hindering the ability of businesses to operate in the borough, as the most significant contributor of pollutants is road traffic and freight.

   The GLA’s Sustainable Design and Construction SPG, provides a formal definition for ‘air quality neutral’ and facilitates a transparent and consistent approach to demonstrating whether a development meets that standard.

   The incumbent Mayor of London has pushed an agenda for air quality positive standards.

   Sensible locating of open spaces in relation to pollutant sources is in some ways an easy win but must be balanced against the need for accessibility and visibility (to encourage use).

### Biodiversity & Green Infrastructure

9. Improve the protection of biodiversity and delivery of net gain by:
   a. Introducing a requirement that soft landscaping and GI elements are resilient to climate change and disease (i.e. through planting choices that ensure a diversity of species and require little water / can withstand increased temperatures).
   b. Endorsing use of DEFRA’s biodiversity metric to standardise

   The benefits of green infrastructure last only as long as the planting in them survives. Landscape professionals should be able to make informed decisions about species that will thrive not only now but as far into the future as possible without additional development costs. Relevant guidance will be signposted.

   DEFRA’s biodiversity off-setting metric was developed as a
valuation.

10. Strengthen the protection and delivery of green infrastructure by:
   a. Designating missing sites as identified in Part 2 ‘Green Infrastructure Additions’;
   b. Modifying MOL designation around Beckton Sewage Works to better reflect up-to-date operational use, legal obligations, and strategic aspiration (see Part 2);
   c. Re-visiting site-specific, spatial and thematic policies to ensure position around GI is fully reflected in each in relation to:
      i. River Thames, Lea and Roding frontage and connectivity (S2, S3, S4, S5 and INF6) including through industrial sites where redevelopment is expected (e.g. Albert Island).
      ii. The specifications around location of open space within sites (ensuring that the location ensures improved quality, connectivity and accessibility especially where it is a relocation of an existing facility).
      iii. Combining HSG22 and HSG23 into a strategic site together with the Hallsville Site reflecting ambitions for a linear central green route and connectivity (as well as housing and a new school).
      iv. Being more ambitious about the amount of open space in S15 Canning Town East and clearer about the reconfiguration of open space in S13 Manor Road.
   v. Being clearer about the strategic open space roles to be played by the Limmo, Royal Victoria and Twelvetrees gasholders site (proposed to become part of the S12 Strategic Site) and the scale and accessibility of such open space.

Given the dispersed nature of green infrastructure in the borough and increased development pressure, it is important to retain and safeguard as much as possible (the multiple benefits are widely recognised). Such protection should not unreasonably limit development potential or flexibility of use as changes are acceptable (where necessary) provided an equivalent or enhanced quantum/quality is maintained. A particular emphasis has been placed on identifying green corridors given their air and water pollution and biodiversity benefits, plus the scope in some cases to use them as local walking and cycling routes.

The proposal to remove / re-provide MOL around Beckton Sewage Works will help safeguard the most strategically valuable parts of GI whilst accommodating the ongoing operations of the works. See mapping included in the sites section for where removal/addition is proposed, the replacement space would link the Greenway with existing MOL at the riverside and meets criteria (a) and (d) of London Plan Policy 7.17.

   i. It is important to ensure that as large scale redevelopment occurs across the ‘Arc of Opportunity’, the chance to improve river frontages and promote access to them is not missed.
   ii. Appropriate siting of open spaces is vital to their use and success, early clarity regarding expectations can help inform successful and coherent masterplanning.
   iii. The Local Plan at present does not reflect the ambitions of the Canning Town SPD with regard to linear connectivity of green space and pedestrian routes through these sites; re-modelling of the school provides further opportunities to extend these east west linkages and connect with the Recreation ground.
   iv. The area in the vicinity of Area 15 is particularly lacking in
access to open space, so there should, as per the SPD ambitions, be greater reflection of this opportunity. There is an opportunity in the masterplanning of S13 to re-provide open space elsewhere on the site, but this should be to better strategic effect as regards quality and accessibility.

v. The Lea River Park is of strategic significance (both to Newham and our neighbouring boroughs) and will make the most of the River Lea asset while transforming a part of the borough that lacks accessible open space and social infrastructure. To achieve aspirations for the park, its constituent parts must be considered comprehensively.

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<tr>
<th><strong>Resource Efficiency &amp; Waste</strong></th>
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<td><strong>11.</strong> Highlight the requirement for buildings to be designed to be as flexible to future adaptation as possible and encourage the use of technologies such as Building Information Modelling (BIM).</td>
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<tr>
<td>Whilst this aspiration is already expressed in design policies, the ongoing intensification of land use makes it more important than ever that buildings are adaptable to future needs and conditions (changing land use demands for example, or changes in climate conditions). Systems such as BIM can help retain building knowledge (i.e. to inform future adaptation) and have the potential to improve project efficiency and inform better design decisions. Benefits may prove limited if systems are rarely used and not well understood, however their use would be optional and not therefore burdensome upon developers.</td>
</tr>
<tr>
<td><strong>12.</strong> Require Site Waste Management Plans to ensure that waste arising from demolition and construction is dealt with as sustainably as possible.</td>
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<td>The scale of redevelopment in Newham is so vast, and the development potential so substantial, that it is important to address waste generation and management in all stages of a scheme; the handling of construction waste requires local specification due to the deletion of such a requirement at the national level.</td>
</tr>
<tr>
<td><strong>13.</strong> Highlight that the safeguarded waste site at Beckton Riverside (Schedule 2 of the <a href="#">Joint Waste Plan</a>, page 52) may not be needed and that this option should be factored into masterplanning of the area.</td>
</tr>
<tr>
<td>Given that existing provision meets the current waste apportionment, and Newham already has a large proportion of land dedicated to waste processing (notably the sewage works) the possible release of this site would better reflect the spatial vision for the borough (moving it away from a ‘peripheral / edge of city’ area to be more intrinsically part of the Capital’s economic mainstream)</td>
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and could expand the potential of the Beckton Riverside area for redevelopment and enhanced use.

**Key Evidence Base Documents**

- LBN Strategic Flood Risk Assessment (Aecom, forthcoming)
- SCC AMR bulletins [forthcoming]
- Valuing London’s Urban Forest (iTree, 2015)

**Questions**

- Are there any other sustainability issues that should be addressed?
- Of the issues identified, are there any that you would prefer us to prioritise?
- Do we seem to have missed any innovative approaches to promoting the development of high-quality, efficient, flexible and resilient buildings and places? Specifically in regard to:
  - Flood resilience
  - Air quality
  - Waste management
  - Energy use and generation
  - and the benefits of green infrastructure
Theme: Infrastructure – Transport (policies INF1 and INF2 plus SP7, 8 and 9)

Issues

You told us:

- Crossrail will bring benefits, but in North Woolwich has also brought considerable disruption and reinforced barriers without there being a Crossrail station.
- Travel around the borough remains an issue, particularly north-south links and ongoing problems of congestion and town centre access in Urban Newham.

We know that:

- We have some areas that are amongst the best in public transport accessibility terms and some that are amongst the worst.
- Rail services continue to improve but at the expense of bus patronage rather than car usage; bus reliability has also decreased.
- Air quality is a significant issue across the borough, much due to transport emissions.
- Road congestion has increased (6% increase since 2014 and 9% increase since 2013).
- Newham has a large amount of space given over to transport depots, dating from a time when there was less demand for the land for other uses; it continues to be an area of search for intensifying such uses.
We Already:

- Seek to secure investment in Newham’s strategic and local transport network to support regeneration and economic development, improving Newham’s integration with the surrounding area and wider sub-region as well as movement within the borough (north-south connectivity is explicitly mentioned) (INF1).
- Promote a more sustainable pattern of movement through location, design and management of new development (INF2, SP7, SP8).
- Have identified areas of significant cumulative impact concern including Sustainable Travel Opportunity Areas (STOAs), Congestion Zones and Air Quality Management Areas (AQMAs) to highlight that even small changes can contribute to bigger issues and opportunities (SP9).

We are concerned that:

- Population increase and new development in Newham will have significant impacts on transport/infrastructure across the borough as well as air quality.
- Connectivity, accessibility and reliability remain key barriers to public transport usage in the borough; this includes severance caused by railway lines and other transport infrastructure and lack of step-free access to key stations (East Ham, Upton Park, & Plaistow).
- As Newham continues to have relatively cheap land compared with more central boroughs and is at the end of some rail, tube and light rail lines, it remains attractive as an area of search for depots, despite this now having more opportunity costs in terms of spatial impacts.
- We need to get parking levels right to avoid parking stress, ensure appropriate access for disabled people, maximise space for other uses and encourage more sustainable travel modes.
Implications

Local Plan Review will need to:

1. Update the strategic transport policy to reflect current investment priorities for Newham and strategic transport providers, working with providers to ensure that these can also absorb the impacts of new developments proposed but also ensure that supporting infrastructure reflects the evolution of the network and change in development context.
2. Specify new sustainable transport interventions and connections that site allocations will require individually and in concert to maximise their positive impact.
3. Set out a more locally specific, context-sensitive methodology to determine appropriate levels of car-parking whilst maximising sustainable transport opportunities, as per the NPPF.
4. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.
### Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Justifications (for pros and cons see IIA)</th>
</tr>
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<tr>
<td>1. Do nothing more than we already do as set out in policies INF1 and INF2 and others as cross-referenced.</td>
<td>Policies are working as intended and are quite comprehensive according to good practice concerning sustainable transport. However issues as scoped suggest to leave them as currently drafted would mean that they weren’t as clear and up to date as they could be with the potential to miss opportunities to secure specific benefits.</td>
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</table>
| 2. Clarify and update policy INF1 to:  
  a. Ensure that the objective is wholly reflected in the policy, in particular, that negative impacts are properly evaluated and mitigated in proposals for major transport investment, (appropriately cross-referencing SP2, SP8 and SP9) with due consideration given to alternative options which may have lesser spatial and other opportunity costs.  
  b. Update policy references to ensure that they reflect current investment priorities and realities for Newham notably in relation to:  
     i. Crossrail/ Crossrail 2 (proposed eastern extension);  
     ii. London Overground (ongoing support for increased capacity and extensions to the orbital rail system (Overground));  
     iii. the Leaway, river crossings;  
     iv. the DLR (further policy reference to support extensions to the DLR network with an explicit reference supporting extensions at Barking and Thamesmead);  
     v. Upper Lea Valley rail (policy support and explicit reference for increase capacity and service enhancements between Upper Lee Valley and Stratford);  
     vi. cable car (strengthen the policy reference to | The negative impacts of transport infrastructure remain an issue in particular congestion associated with works and its impacts on health and quality of public transport service, and barrier effects of surface lines and depots, which are also very space hungry. Policies elsewhere in the plan allow for these negative impacts to be assessed alongside the positive, but this could be more explicit in the policy itself to reinforce due consideration by providers.  
  
Securing investment in transport infrastructure ensures people have access to jobs, social infrastructure and places to visit. With future increases in population and ongoing development and regeneration across the Borough, improving transport linkages is a key component of ensuring successful places, meeting expectations of residents, businesses and investors. The borough has benefited from major strategic transport improvements but ongoing and proposed strategic transport initiatives have evolved since 2012. The Local Plan Review is an opportunity to comprehensively update the current framework of projects and completions.  
  
A more comprehensive policy acknowledgment of safeguarded transport infrastructure would provide clarity for proposals to fully consider the operational functions of these |
encourage measures to improve local usage of the cable car as a transport link;

vii. step-free station access (in line with City Hall aspirations; explicit reference at Plaistow, Upton Park and East Ham stations);

viii. wharves and navigable waterways (further encouraging wharf consolidation where strategically advantageous);

ix. and freight railheads/sidings (acknowledging there are none to safeguard in the LPA area);

x. the airport (delete reference to the out of date masterplan).

c. Strengthen and reinforce in policy the role of safeguarded transport infrastructure e.g. radar sightlines, stations and mooring points as part of the strategic transport network and regeneration objectives, whilst clarifying that infrastructure with a large land take (e.g. depots) should not be extended further and providers will be encouraged to consider ways to reduce its spatial impact consistent with the evolution of the network and opportunity costs.

d. Structure the policy with more numbers and sub numbers and otherwise update and bring clarity, focus, conciseness and comprehensiveness.

3. Amend Policy INF2:
   a. to be clear that London Plan standards are a starting point for establishing parking levels, but accessibility, type of development, local car ownership and the overall need to reduce the use of high-emission vehicles will also be considerations; and
   b. otherwise update and bring clarity, focus, conciseness and comprehensiveness notably through appropriate cross-referencing of SP8.

The Local Plan Review will seek to ensure opportunities for Sustainable Travel are maximised, congestion is reduced and reliance of the car is significantly decreased. As such the policy will need to strengthen the assessment of car parking to ensure appropriate levels are met taking into consideration accessibility of the scheme, type, mix and use of development and local car ownership levels (as per the NPPF). The ongoing promotion of Car Clubs and publicly accessible electric charging points will be secured as a key component of sustainable transport provision in Newham, in line with 'Keeping Newham Moving: a New Deal for our facilities. As such this option would strengthen in policy Newham’s ongoing support for the operation of safe and functioning safeguarded infrastructure. However, the option also acknowledges the need to consider ways to make infrastructure requirements more compatible with other land uses, consistent with increased demand for land in the area.

The policy is not currently very easy to read or refer to due to lack of numbering and sub-numbering. It may also benefit from other minor edits to improve its currency, clarity, comprehensiveness and focus.
4. Specify in Strategic Site allocations and spatial policies particular connections and sustainable transport interventions that should be delivered as part of any development, particularly:
   a. pedestrian connections through sites (notably to the Thames from the Docks), at a 200m frequency, with cycling connections at a 400m frequency;
   b. facilitation of step-free station access on appropriate sites;
   c. local river crossings and riverside paths particularly those associated with the Lea River Park; and
   d. ‘Activity streets’ along North Woolwich Road and in the longer term Woolwich Manor Way in addition to those already specified in Canning Town and Custom House to secure sustainable travel measures and improve pedestrian connectivity and public realm;
   e. Bus penetration of large sites, achieving public transport access within at most 800m;
   f. DLR depot reconfiguration/re-location at Beckton.

Development has an important role to play in securing investment to improve connectivity. Allocation of strategic sites should make reference to the public transport context of the surrounding area and how development of the site can secure improvements in sustainable transport, being clear what will be sought through S106 agreements as opposed to CIL

Addition of another layer of specification may make site allocation tables more cumbersome, but will help clarify the expectations from the site and its interactions with neighbouring sites.

Reference in the Royal Docks spatial policy to ensure development contributes to securing investment to improve connectivity. Promotion in the policy for an ‘activity street’ creating local activity focal points at North Woolwich Road/Albert Road (with longer term aspirations at Woolwich Manor Way to improving connectivity from S19 to the North Woolwich Local Centre). As such developments would better connect these areas for both pedestrians and maximise sustainable transport measures secured through
5. Any other amendments as seen to be necessary to clarify and update the policies e.g. strengthen in policy S1.9 the overarching borough wide objective for a modal shift towards sustainable travel and maximise opportunities to support this including active travel, improved walking and cycling facilities and public transport. These would help to support the correct implementation of policies so that they work to best effect.

**Key Evidence Base Documents**

- Infrastructure AMR [pending]
- Local Implementation Plan 2 – Newham’s Transport Strategy (2011) and Update/LIP3 (2014)
- TfL Business Plan 2016

**Questions**

- Is there anything else we can do to promote sustainable transport in Newham?
- Are the above options appropriate? Are there advantages or disadvantages that haven’t been acknowledged?
- What would most persuade you to leave your car at home, or not own a car?
Theme: Infrastructure - Social Infrastructure (retail hierarchy & network and community facilities)

Issues

You told us:

- Quality and impacts of community facilities raise more concerns than the distribution of facilities: people are happy to travel to get better services. You are less satisfied with education and healthcare provision than previously.
- Community spaces for use by multiple group use are important and concerns exist over large, single group facilities.
- Social isolation is an issue for certain people (elderly and disabled people).
- Lack of publicly accessible toilets makes it difficult for some people to enjoy the borough’s centres and public spaces.
- The distribution of shopping provision is generally seen to be satisfactory, (pending the full opening of new, planned provision) but needs to keep pace with new development and allow for easy access; quality is also still seen to be lacking.

We know that:

- Community infrastructure providers including the CCG and the Council are reviewing their networks of premises to make them more efficient in relation to projected needs and resources, accessible to a wider group of people, and of higher quality; this involves some existing sites and some new sites4.
- There is a need to increase the number of school places available, particularly secondary level, to meet the needs of a growing young population5, with pupils of secondary school age tending to remain in the borough rather than move on. Childcare provision is also likely to need to increase to meet demand created by new free entitlement6.

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4 Newham Clinical Commissioning Group Local Strategic Estates Plan – June 2016 and Review of the leasing arrangements for community centre buildings owned by the Council (Parts A & B) (Cabinet, January 2017).
There will be additional demand for sports pitches and especially informal pitch provision in the future; there is a deficit of artificial (3G/astro-turf) pitches already, but a large proportion of this could be met by improved community access to provision in schools.

Over 80% of Newham’s 16 sport’s halls in community use are located within educational facilities (schools and UEL).

The Retail Strategy set out in the Core Strategy continues to be appropriate in relation to available spend and performance of retail floorspace; Stratford has the most opportunity and East Ham has suffered most from the opening of Stratford City.

We Already:

- Plan for new development to be served by appropriate social infrastructure: shops and community facilities. Community facilities are defined as “education (from pre-school to further and higher education) and training, health, social, leisure, places of worship, community (which could include pubs in some cases where other facilities are lacking), cultural and civic uses (including criminal justice and court facilities) and emergency services ” plus “older people’s housing and specialist provision for other vulnerable people (falling into Use Class C2)” (INF8).
- Ensure changes to community facilities reflect local needs, (balancing their provision with other demands on land) prioritising new healthcare and education provision on Strategic Sites and carefully managing loss of community facility floorspace (INF8, INF10).
- Plan for community facilities to be accessible to all and multi-functional in their distribution and design, directing most to town and local centres which can best handle large numbers of users, but allowing for more localised provision in particular circumstances (INF8, INF10).
- Have a planned network of town and local centres, together with local shopping parades, where retail, services, community facilities and other attractions are focused in locations where they can thrive on passing trade as well as local residents’ spend (INF5).

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Plan for significant growth at Stratford and Canning Town, consolidation in other centres, and allow for evolution of Gallions Reach to become a town centre (INF5).

We are concerned that:

- It is difficult to plan for successful places reactively: it is preferable for community infrastructure plans to be reflected in and facilitated by the Local Plan where shown to be of local benefit, so they can be aligned with other strategic planning considerations (densities, availability of play-space, playing fields and transport planning) and viability testing of sites and policies.
- Finding new sites for community facilities is difficult due to viability, and therefore asset disposal and new provision needs to take account of other providers’ needs as well as the owner's investment plans.
- There is confusion as to whether community facilities specified in INF8 which are not D1 uses, (e.g. D2 commercial leisure uses such as gyms and cinemas, Sui Generis cultural/leisure uses such as nightclubs) should nonetheless be subject to the same policy (i.e. INF8 and INF10).
- The protection afforded to playing pitches, play space, MUGAs and associated facilities is unclear as not all are ‘green infrastructure’ and they comprise more than green space.
- The transformation of Gallions Reach into a town centre needs to be set within the broader strategy for major development in the area.
- Retail and leisure uses help make successful places, but must be provided in a way that doesn’t compete with existing centres; some provision continues to occur in a low density, inefficient format.
Implications

Local Plan Review will need to:

1. Re-visit the definition of community facilities in INF8 particularly as used in INF10, so that it fits appropriately with the strategy set out for these uses, and clarifies the status of those which may otherwise fall between policies.

2. Make the policies more sensitive to market processes including development viability and the difficulty of finding new social infrastructure sites, further encouraging mixed use and flexible use principles.

3. Make site allocations that are cognisant of social infrastructure providers’ estates plans, where these are of local benefit.

4. Continue to support the strategic management of the town centre network and hierarchy, including a new role for Gallions Reach as part of a wider development area.

5. Otherwise review social infrastructure policies for clarity, currency, focus, conciseness and comprehensiveness in light of the issues, identified above.
# Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Justification (for evaluation of pros and cons, please see IIA)</th>
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<tbody>
<tr>
<td>1. Do nothing more than we already do in Policies INF5, &amp; INF8 – INF10 &amp; H5</td>
<td>Policies, having recently been added to, are comprehensive in addressing the provision of social infrastructure, and are performing well at appeal. Continuity can be an advantage, but there are weaknesses as identified.</td>
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<tr>
<td>2. Clarify the definition of community facilities and expectations around their inclusion in new development:</td>
<td>These alterations to the policy offer clarity as to what defines a community facility in policy terms. They also serve to consolidate the list of community facilities into one specific policy, and addresses the policy reference to specialist housing, (treating in policy terms as a community facility) which is currently outlined in policy H5 and not in INF8, as well as overlap with green infrastructure policies whereby the status of playspace, pitches, MUGAs and associated facilities may be regarded as unclear. Including these facilities in the definition of community facilities means that they are included in the policy presumption in INF8:1 that requires new development to be supported by appropriate facilities to meet local needs.</td>
</tr>
<tr>
<td>a. Being clear that it includes lawful D2, A4 and Sui generis uses as well as D1 uses where these are regarded as community facilities by the definition in INF8;</td>
<td>Public toilets whether provided by a local authority or ‘publicly accessible’ are not mentioned in the Local Plan but have been reducing in number over time. This can have a negative impact, particularly for certain groups such as the elderly, those with disabilities and people with young families, affecting their use of places such as town centres. New development should look to provide new publicly accessible toilets, managing them as part of the public realm or broader community facilities.</td>
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<td>b. More clearly including pubs, without the caveat ‘where other facilities are lacking’ (as if loss were to be proposed then this would be dealt with by other criteria in INF10);</td>
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<td>c. Adding in the specialist housing referred to in H5 to the definition in INF8;</td>
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<td>d. Include children’s playspace, playing pitches (including MUGAs) and associated facilities in the definition;</td>
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<td>e. To include public toilets, being clear that new publicly accessible toilets should be provided for in new strategic development incorporating local or town centres, and that having publicly</td>
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accessible toilets may be one aspect of making a community facility open to the wider community.

3. Insert the requirement to Policy INF8 to consider mixed use developments that include new or enhanced community facilities where these are to be re-built or newly provided, alongside other compatible and policy compliant uses, notably housing.

Continuing the concern to increase the efficiency of land use, ensuring that both local infrastructure and other needs (e.g. housing) are met, and in doing so, helping to make community facilities more integrated with the community, more secure (due to presence of residents etc when the facility is closed) and more viable.

4. Modify policy to more appropriately allow for market forces to operate in relation to commercial community facilities and to better direct these to help realise social infrastructure development plans by:
   a. Excluding commercial (D2, A4 and leisure/culture sui generis uses) community facilities from the requirement in INF10:3 to demonstrate local need where proposed in policy compliant locations;
   b. Excluding D2 uses from the requirements of INF10:4;
   c. Altering INF10:4 to allow for a mixed use ‘compromise position’ so that rather than wholesale release of facilities to other uses, or protection as is, mixed use redevelopments incorporating residential and replacement community floorspace meeting need should be allowed for in

The definition of Community Facilities in Policy INF8 in conjunction with Policy INF10 may inappropriately fetter competition where such facilities are commercial – making it difficult for new commercial leisure and cultural activities to open, even in policy-compliant locations, or dis-incentivise the re-focussing of their operations in more appropriate locations. Options 4a and 4b address this anomaly in line with proposed options elsewhere in the Plan to encourage the night-time and cultural economy in appropriate locations in relation to spatial strategy and cumulative impact. Option 4c reflects the reality that new models of provision can often occur within a mixed use building or site and as with option 3 above, we should encourage the more efficient use of land, which may in turn help the viability of a social infrastructure plan and the likelihood that it can be implemented. It nonetheless would ensure that the overall difficulty in finding available and viable new sites for social infrastructure provision is adequately managed. Option d clarifies that, in the context of the ongoing need for landlords to secure viable asset management, peppercorn rents would not be regarded as appropriate benchmarks.
marketing, and required to be explicitly considered as options (drawing such potential to the attention of local providers that have indicated need) in asset disposal processes;

d. Clarifying that, in relation to marketing requirements in INF10:4b, benchmark rents would not include peppercorn rents.

5.

a. Allocate a number of social infrastructure sites to reflect the strategic approaches of providers and to fulfil the local need in relation to:

i) Health sites;

ii) Education sites; and

iii) Flexible Community Facility Sites (mostly mixed use flexible/multi-purpose community facility with residential).

taking into consideration other policy criteria about how these should be designed, and where appropriate setting out how key constraints may be overcome.

b. Update the IDP (Infrastructure Delivery Plan) to reflect up to date health, education and flexible community facility needs, being clear that this is included as a strategic infrastructure plan for the purposes of INF10:3:e.

c. Amend East Ham town hall site (S26) to

The NHS Newham Clinical Commissioning Group (NCCG) and the Council, amongst others, are reviewing their networks of premises/provision in order to make them more efficient in relation to the projected needs of the area and the resources available to meet them. The amendments proposed would provide scope for the health and education and community space needs of the borough to be met in a strategic manner, reflecting wider Local Plan objectives concerning best use of land, local access and mixed use, cohesive and resilient communities. It will also help reflect the realities concerning build-out times that may entail the need for temporary facilities.

It should be noted that a number of community facilities sites have options for being either community facilities sites (additional incorporating housing) or for housing only. These are undergoing an options assessment process, taking into account investment requirements, (i.e. ensuring the facility meets appropriate quality standards in a viable way) alternative provision available or soon to be available locally, opportunities to enhance the efficiency of the site and secure better integration with its context, and requirements of providers using or seeking space in the area to meet local need. The response to this consultation can help inform the ongoing evaluation of options for the future of such sites, in the context of a broader strategic approach to the management of community infrastructure provision across the area that responds to identified issues around accessibility and inclusivity, site availability, balancing needs for community infrastructure and other development (notably housing) and so on.
contain the presumption that the police station site should be considered in conjunction with the adjacent college site.

d. Amend criterion 5 of INF10 (which prioritises health, childcare and education facilities on Strategic Sites) to encourage the consideration of locating meanwhile education and health facilities on Strategic Sites whilst permanent facilities are being built.

e. Clarify that it will be acceptable for schools, particularly secondary schools, in lieu of dedicated playing fields to have good local access to wider open space suitable for playing pitch provision.

f. Ensure that where new or intensified community facility provision is being proposed, that it takes account of other infrastructure providers’/commissioners’ expressed needs and scope for co-location.

Where such sites are presented as having only one option - ‘residential plus community facilities’ (i.e. without a residential only option) credible new or continuing needs-backed interest has been shown in them by relevant social infrastructure providers or commissioners with a lack of alternatives available in the area, whilst re-development of the site from its present use/configuration presents the opportunity to introduce residential as well as, (or partly to enable) the meeting of such needs.

In the case of the 2 leisure centre sites, these are subject to ongoing options appraisal as both have been identified as being towards the end of their life in their present form. Cognisant of this process, the [Local Plan] options proposed for the Balaam Leisure Centre site reflect the scope for re-location of the leisure centre closer to/within Canning Town centre given the extensive redevelopment sites in the vicinity, which would better support broader regeneration and accessibility objectives compared to its re-provision in its present location. The existing site, if vacated in this way could be considered as suitable for a mixed-use ‘LMUA’ redevelopment (which could incorporate some community floorspace) given its local centre and mixed use surroundings, or residential only given alternative provision locally. In the case of Newham Leisure Centre, the [Local Plan] options reflect the potential to re-provide the centre on-site, or potentially do so with some enabling residential, where this would secure enhancement of the facilities including those categorised as ‘green infrastructure’. Again, responses to this consultation will help inform the ongoing evaluation of options for the future of these sites.

In the case of education and health sites identified for these uses only, these reflect the provisionally identified scope to intensify or otherwise upgrade provision within existing site boundaries whilst still providing for adequate playspace, parking, emergency access etc. At this point, given these requirements and the early stage of capacity work, the proposing of mixed use options incorporating residential on a site by site basis is not considered appropriate, but would be allowed for by option 3 above, at the point of plans being progressed for the sites. Responses to this consultation can help inform detailed specifications around their allocation,
6. Update policy INF5 to align with the updated evidence base and strategic spatial strategy:
   a. Allocate the Gallions Reach retail park within a Strategic Site with the requirement that it is re-designed and re-provided to form a town centre for the area meeting new local needs in a vertically mixed use and denser format, masterplanned as an integral part of the wider site and with a transformation in its access (to be much more of a ‘walk-to’ centre) and orientation (to serve a new residential hinterland). Make it clear that only local population uplift and re-design as part of that may make it a suitable candidate for Major centre designation.
   b. Further new local centres to be specified at:
      i. Lyle Park adjacent to the Silvertown DLR station
      ii. S08 adjacent to the DLR station
      iii. Beckton Riverside alongside appropriate transport nodes where there is less immediate access to the new town centre or other new provision (e.g. at Gallions).
   c. Updated references to Maryland (now a designated local centre) Stratford (now a

   Required to ensure that proposed site allocations are aligned with and embedded within the strategic policy as already set out in INF5 – see IIA and site allocations section for further information, and that INF5 is updated to reflect boundaries adopted as part of the Detailed Sites and Policies DPD, the London Plan 2015 and the refreshed retail study.

   Management and re-provision of Gallions Reach as part of the wider site allocation for a significant new piece of urban development would allow for the various constraints that impact on the site to be managed to best effect, and for the retail provision to be better integrated into the town centre network.

   New local centres, as elsewhere, are to be explicitly referenced as opportunities in relation to public transport nodes, where there are gaps in the network and significant levels of development proposed.

   Although each town centres has seen some development, all have the capacity and strategic need for more, through strategic development sites, renewal of existing stock and the potential to increase densities.
Metropolitan centre) and Local Shopping parades in INF5a, and continuing aspirations for town centres as set out in INF5.

7. Otherwise update, clarify, focus and consolidate policies including:
   a. Criterion 4c of INF10 (which allows for release of community facility sites where a facility is unsuitable in size and scale for its location in relation to the spatial strategy and where the local area has good access to a local/town centre) to ensure that this explicitly includes consideration of access to facilities meeting similar local needs where these arise.

Editing policies in the existing Local Plan would support their implementation to best effect and ensure that they are up to date in relation to the broader policy context, wider corporate initiatives, opportunities and external standards. Some changes may however make policies marginally longer and more unwieldy.

Key Evidence Base Documents

- LBN Local Plan Review Engagement Evidence Base (forthcoming)
- Newham Clinical Commissioning Group (NCCG) Estates Strategy (2016)
- Review of the leasing arrangements for community centre buildings owned by the Council (Parts A & B) (Cabinet, January 2017).
- East London Foundation Trust (ELFT) Estates Strategy (2013)
- NHS Five Year Forward View (2014)
- Transforming Services Together (2015/16)
- Newham Liveability Survey (2015)
- Newham Annual Residents Survey (2015)
- Childcare Sufficiency Assessment (2015)
- GLA Social Infrastructure Supplementary Planning Guidance (2015)
• LBN Playing Pitch Strategy (forthcoming)
• LBN Built Facilities Strategy – (forthcoming)
• LBN Town Centres and Retail Study (2010)
• LBN Town Centres and Retail Study Update (2016)

Questions

• Is it appropriate that the definition of community facilities should be clarified and broadened in order to ensure that the appropriate planning policies apply? Is anything missing from the expanded definition as proposed?
• Should policy actively encourage the incorporation of new housing alongside new community facilities where possible?
• Should market forces be allowed to operate further in relation to the provision of commercial community facilities so as to ensure they are located in the most appropriate locations?
• Should specific allocations be made in relation to community spaces, health and education facilities, in order to ensure that this provision is managed in a strategic manner? Should other social infrastructure estates plans be reflected in site allocations?
• How does Gallions Reach need to change to become a town centre?
Theme: Social and Physical Infrastructure Delivery

Issues

You told us:

- There is confusion, particularly from infrastructure providers about what infrastructure will be sought though the planning process associated available funding and priorities.
- The Infrastructure Delivery Plan (IDP) is out of date; it is not clear where any updates are published, or their status.

We know that:

- Each time a planning application is assessed representations are received from residents and other stakeholders requesting that certain types of infrastructure require additional capacity or need to be upgraded. A considerable amount of time is spent negotiating what, if any, social and physical infrastructure is required to make individual planning applications acceptable in planning terms and who will bear the cost of this.
- Strategic Sites, particularly housing schemes, are required to ensure that there is commensurate job growth and requisite supporting infrastructure but cumulatively sites need to contribute towards other infrastructure necessary to make development acceptable – and the borough needs to achieve the optimum balance between jobs, homes and infrastructure to benefit existing and new residents.
- There is limited public sector funding for a range of infrastructure, with a change in central government funding for local government, education, health etc. The introduction of the Mayoral and Newham CIL Charging Schedules has presented both challenges and opportunities for delivering infrastructure throughout the borough.
We Already:

- Establish that the delivery of affordable housing (on sites of 10 units+) and family housing is maximised within planning applications to deliver the optimum provision of this social infrastructure in the right locations (Policy H1 & H2, S1).
- Seek to enable Convergence by tackling worklessness and maximising employment opportunities by improving the borough’s educational attainment and working with developers to ensure local people can access new job opportunities (Policy J3, J4).
- Ensure that existing deficiencies in the quantity, quality and access to green and blue infrastructure are not exacerbated and where possible are protected and ensure new development has commensurate open space for new residents (Policy INF6, INF6a & INF7).
- Promote the delivery of appropriate waste infrastructure and a combined heat and power network (INF3, INF4).
- Seek to protect community floorspace where there is local demand and ensure that these facilities are open and accessible to the whole community (Policy INF8 & INF10).
- Support the delivery of Strategic Transport and the local sustainable transport interventions, with the expectation that the development cost is borne via S38/S278 Highways Agreements or other Council or third-party investment (INF1 & INF2).
- Ensure there is no conflict between the infrastructure which may be funded by the Community Infrastructure Levy and that which may be funded by a planning contribution and/or is provided on-site in-kind.

We are concerned that:

- Investment strategies from key infrastructure providers have not been forthcoming, have lacked detail or clarity concerning the investment that is required or will be made in infrastructure in the borough, meaning that individual planning applicants must make assumptions on the infrastructure that their development will need to rely upon and/or make a contribution towards.
- The relationship between the IDP and other pieces of commissioned work (e.g. in the Royals Enterprise Zone) around infrastructure sufficiency is unclear.
- The way services are being delivered is changing and we want to futureproof the development of the borough in line with that.
Policy expectations to support employability initiatives and local businesses may not be readily identified as a key Council priority, with the commitment to utilising local labour during construction and end use paramount to enabling sustainable development in the borough (including a resilient local workforce, less reliant on private vehicles etc.).

Some of the planning applications which have been proposed on Strategic Sites have been not in line with the site allocation, meaning infrastructure requirements need to be more robustly assessed and the implications for capacity for future development sites has to be adjusted. These adjustments to capacity are not necessarily incorporated into planning policy documents or the infrastructure delivery plan in a timely fashion and could delay the delivery or realisation of some developments in the borough.

Implications

Local Plan Review will need to:

1. Clarify the borough’s priorities in respect of infrastructure delivery to support growth and ensure its benefits are spread.
2. Establish that the relationship between the Community Infrastructure Levy and Section 106 Agreements will be dealt with in more detail in a Planning Obligations Supplementary Planning Document, in line with priorities established in the Local Plan and the London Plan.
3. Work in parallel with the CIL Review to ensure appropriate rates are levied and the right infrastructure is secured across the borough.
4. Re-affirm the importance of infrastructure delivery bodies keeping the IDP up to date, so that their plans can be integrated into the spatial strategy; identify where updates will be published and recognising it as an important policy consideration.
### Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Pros &amp; Cons/ Justification</th>
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<tbody>
<tr>
<td>1. Do nothing more than we already do. The policies throughout the Development Plan identify infrastructure requirements and each planning application will continue to demonstrate their contribution towards infrastructure need.</td>
<td>Policies through the Development Plan establish a variety of local and strategic priorities that should be taken into consideration when somebody seeks to bring forward a policy compliant scheme in Newham. Doing nothing does leave some ambiguity and require landowners to constantly engage on infrastructure delivery and how their development site might have to contribute to things. There will be less clarity on the investment to be input by infrastructure providers and the contribution required/expected by Developers/Land Owners to enable the growth of the borough.</td>
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<tr>
<td>2. Strengthen the policy to clarify: &lt;br&gt; a. That all Development will be required to make a contribution to social and physical infrastructure; this includes through the payment of the Mayoral and Newham CIL, and particularly on larger schemes, appropriate on S106 contributions to affordable housing, the employability of local residents and businesses; and towards anything else which is necessary to make an application acceptable in planning terms where this is not provided for in funded infrastructure plans.</td>
<td>All Development will be required to make a contribution to social and physical infrastructure; this includes through the payment of the Mayoral and Newham CIL; the provision of affordable housing, utilising and contributing towards the employability of local residents and businesses; and towards anything else which is necessary to make an application acceptable in planning terms. A Planning Obligations Supplementary Planning Document will be produced to clarify, in line with amendments to the Regulation 123 list, what the expectations are of in-kind or financial contributions towards physical and social infrastructure. Development proposals, particularly on Strategic Sites need to ensure that their infrastructure requirements do not place an unacceptable detrimental impact onto existing communities or fetter 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.</td>
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<tr>
<td>b. An indicative priority for the delivery of employment opportunities for local residents, the delivery of family housing and the delivery of affordable</td>
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Clarifying the borough’s priorities sends out a key message to the development industry about the costs of proposing and delivering policy compliant schemes in the borough, enabling mixed and balanced communities with more independently economically active local residents, and the particular objectives where viability is limited. This should help focus otherwise lengthy negotiations and ensure that existing communities have assurances as to how impacts of growth will be mitigated.

### 3. Re-affirm that the Infrastructure Delivery Plan:

- a. is regarded as integral to the successful delivery of the Development Plan and establishes the strategic approach to infrastructure, referenced e.g. in Policy INF10, having been informed by discussions with providers about the quantum and location of proposed development going forward and as such where a planning application seeks to provide strategic infrastructure requirements identified within it (including but not limited to energy, telecoms, sewage, education and health facilities), inline with extant policies, will be supported in principle.

- b. is periodically updated to provide updated available information on the borough’s infrastructure requirements from providers and on the basis of commissioned technical work, and published alongside the main Local Plan documents on the website.

The NPPF confirms that 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. This collaboration has, to date, been sporadic. The reaffirmation of the IDP as integral to the delivery of the Development Plan means that infrastructure providers, land owners and developers will need to use it to be cognisant of the full costs of delivering schemes in the borough and the associated impact on demand/need for infrastructure and services.

The requirement for an Infrastructure Delivery Plan was introduced into the system to ensure the deliverability of plans with requisite supporting infrastructure. These options seek to embed the IDP more clearly into the plan and clarify how it should be updated and those updates published and incorporated into the plan. Such updates would clarify what has been delivered and any change in the need/demand for infrastructure that needs to be factored into masterplanning, impact testing and providers’ strategic planning. As well as being informative for developers and providers, it also helps provide comfort for existing residents and businesses that growth can be appropriately accommodated within planned infrastructure provision.
c. Is used to update the spatial strategy where these updates are aligned with Local Plan Review.

Key Evidence Base Documents

- Newham Local Plan Review Engagement Evidence base [forthcoming]
- Newham Infrastructure Delivery Plan 2013 (and forthcoming update)
- Royal Docks & Beckton Riverside OAPF DIF study (forthcoming)
- Mayoral CIL Charging Schedule 2012
- Newham CIL Charging Schedule effective 2014 and relevant Regulation 123 Infrastructure lists
- Planning Obligations Annual Monitoring Reports

Questions

- Are the expectations of what a Land Owner/ Developer may have to contribute through planning obligations and the borough’s priorities to this end clear?
- Is the borough’s commitment to working with stakeholders to ensure that sufficient infrastructure is provided by each planning application clear?
- Is there sufficient support in existing policies towards the provision of strategic infrastructure?