



Quod

R22 Local Plan

**Matter 12:
Green and
Water Spaces**

**Newham Local
Plan**

St William Homes LLP

27TH NOVEMBER 2025

Q253076

Matter 12: Green and Water Spaces

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 12 Green and Water Spaces. This hearing statement responds to IN3 'Inspector's matters, issues and questions, written statements; and hearings programme issued by the Inspector on 9th October 2025.
- 1.2 These comments are made further to those submitted on 6th November in relation to Matter 12 which were made specifically in relation to St William's former East Ham Gasholder site. Comments provided in this hearing statement are general and where relevant relate to other St William development sites in the borough. They should be read in conjunction with our comments submitted on 6th November.

Policy GWS1 Green Spaces

Q12.1 Is policy GWS1 justified and consistent with national policy and the London Plan? In particular:

- 1.3 As set out in our submission made on 6th November, we do not consider Policy GWS1 to be sound as it is inconsistent with the London Plan particularly in relation to Metropolitan Open Land (part 1 (b)). The overarching principles set out in this policy about encouraging easy access to green space, maximising opportunities to deliver new green space, managing impacts on existing green space and delivering high quality green space are supported and align with the Framework¹ and London Plan².

a) Is the designation of each green space included on the policies map justified?

- 1.4 The designation of each greenspace included on the policies map is not justified, please refer to our response submitted to Matter 12 on 6th November 2025 (paragraphs 1.5 – 1.10). It is unclear how the Council's evidence base has informed the designation of specific greenspaces across the borough (as shown on the policies map). Furthermore, it is unclear whether the designated greenspaces relate to existing greenspace, proposed greenspace or both. One further consideration relates to the site allocations, which include site specific requirements and plans which provide indicative layouts for site allocation requirements. Helpfully, these site allocation maps have been updated to make clear that they are indicative. Where new greenspaces are proposed across the borough generally the same level of flexibility should be incorporated to ensure that the delivery of greenspace reflects actual need at the time of delivery.
- 1.5 The designation of the majority of Site Allocation N13.SA3 is unreasonable and is outlined in the 6th November submission of Matter 12,

¹ Paragraph 103 and 104 of the Framework

² Policy G4 of the London Plan

1.6 As drafted, the policies map is ambiguous and contrary to the Framework³.

c) Are the areas of Metropolitan Open Land designated on the policies map consistent with the London Plan?

1.7 Please refer to our submission made on 6th November in relation to the N13.SA3 Allocation, specifically paragraphs 1.13 – 1.17 and Chapter 2 where the designation as MOL is considered not appropriate when assessed against the relevant criterion.

1.8 This Hearing Statement considers the robustness of the Council’s evidence base and our assessment of the respective Green Space and Metropolitan (‘MOL’) designation at N17.SA1 Beckton Riverside.

1.9 The Green Space / MOL designation ‘A2’⁴ within and beyond the eastern boundary of the N17.SA1 Site Allocation (see Figure 1) is not justified as it does not serve any of the purposes for Green Belt outlined in the Framework⁵ or the criteria for MOL outlined in the London Plan⁶. It is not distinguishable from the built-up area, it does not include features of national or metropolitan value, and it is not currently publicly accessible due to the accessibility constraints. The evidence base⁷ justifies the MOL designation based on its biodiversity (Criteria C) and wildlife corridor (Criteria D). The development (24/00989/OUT) that has recently received resolution to granted for part of N17.SA1 ‘Beckton Riverside Phase 1’ requires full remediation of the Site which will include the complete removal of the top levels of earth/soil (see also response to Q12.3a) which will include the removal of all existing vegetation regardless of value.

³ Framework Paragraph 16 (d)

⁴ EB069 MOL Area 2

⁵ Framework Paragraph 143

⁶ London Plan Policy G3

⁷ EB069 MOL Area 2

Figure 1 – MOL Designation A2



1.10 St William's Beckton Riverside Phase 1 proposals will deliver a series of new connected open spaces including accessible riverside open space within this MOL designation, which will improve the quality of the existing MOL as well as providing public access to the riverside through the provision of a 2.5-hectare park. This space and the Phase 1 proposals will include a substantial on-site biodiversity offer with native trees and meadow planting as well as off-site biodiversity improvements due to the loss coming from the comprehensive remediation works. Following the grant of planning permission and implementation of the Beckton Riverside Phase 1 proposals, the MOL designation becomes redundant and will no longer reflect what is on site as a result of the remediation necessary to facilitate development (Criteria C and Criteria D). On the basis this MOL designation fails to meet the relevant criteria the MOL at N17.SA1 and should be deallocated in line with Policy G3 C of the London Plan.

Figure 2: Beckton Riverside Phase 1 Masterplan



d) Is the application of policy GWS1 to land not designated as green space on the policies map justified and does that represent a clear unambiguous approach?

1.11 There are principles within Policy GWS1 which we consider should be applied to land not formally designated as greenspace such as parts 1 (e) and (g). If there are principles and policy objectives that only relate to greenspaces and not all sites then this should be made clear.

e) Is the reference in part 3 to development on green space only being supported in exceptional circumstances justified?

1.12 Please refer to our response to Matter 12 dated 6th November, specifically Paragraph 1.6 and 1.11.

f) Are the requirements in part 5 relating to future maintenance of new green space justified?

1.13 In line with our wider representations⁸, the prescriptive requirements relating to future maintenance of new green space and a commuted sum to cover maintenance over a period of 15 years within part 5 of this policy are too detailed for policy and are not effective nor sound

⁸ St William Response to Matter 1: Paragraph 1.16 – 1.18

in the context of Paragraph 45 of the NPPF. Viability considerations are also pertinent to considerations and should be baked into policy wording.

- 1.14 If deemed to be necessary to secure this requirement within policy, the policy wording should clarify that there are two potential approaches to managing and maintaining new open green space, rather than assuming automatic transfer to Council ownership. A privately owned and managed approach should be recognised as a deliverable approach, as frequently implemented throughout London.
- 1.15 St William supports controls pertaining to the future maintenance of new green space. However, we do not consider it necessary or justified to include this requirement within the Local Plan⁹. This requirement can either be set out in the validation checklist¹⁰ or by planning condition.
- 1.16 Furthermore, a requirement for a Management Plan should not be set out within planning policy in line with our response to Question 1.7. The provision of Management Plans are provided for public realm and open space however they can also be provided via a planning condition and not just within a legal agreement. The policy as drafted does not incorporate sufficient flexibility and is overly prescriptive. St William's response to Matter 1 Q1.9 in relation to the Whole Plan Viability confirms that "the total cumulative cost of all relevant policies must not undermine the deliverability of the plan"¹¹.
- 1.17 Proposed revisions are set out in **Appendix 1**.

Policy GWS3 Biodiversity, urban greening and access to nature

Q12.3 Is policy GWS3 justified and consistent with national policy, the London Plan and relevant legislation? In particular:

- 1.18 Overall, St William considers that this policy is not effectively prepared, and therefore fails to meet the tests of soundness set out in the NPPF¹². The management requirements outlined at Part 1f are already secured by the Biodiversity Net Gain regulations¹³, it is therefore not considered necessary for this to be duplicated in Local Plans. Furthermore, Part 2 is an unnecessary duplication of application requirements, requiring the submission of an ecological assessment, and in line with our wider representations (e.g. Paragraph 1.14 of this Statement), is a prescriptive requirement which is not effective nor sound in the context of Paragraph 45 of the NPPF. Part 3 is responded to in Q12.3c below.

a) Are the Sites of Importance for Nature Conservation designated on the policies map justified?

- 1.19 The designation of Site of Importance for Nature Conservation (SINC) at the following site allocations is not justified:

⁹ Framework Paragraph 36

¹⁰ Framework Paragraph 45

¹¹ PPG ID10-002-21090509

¹² Framework Paragraph 36

¹³ Environment Act 2021 Schedule 7A

- **N7.SA2 (Twelvetrees Park and Former Bromley by Bow Gasworks)**
 - Existing SINC proposed to be extended in the Emerging Local Plan (see Figure 3)
- **N13.SA3 (Former East Ham Gasworks)**
 - SINC proposed within the Emerging Local Plan.
- **N17.SA1 (Beckton Riverside)**
 - SINC proposed within the Emerging Local Plan (see Figure 5).

Bromley by Bow Gasworks

- 1.20 The site is subject to an existing SINC designation as a result of the Open Mosaic Habitat that occupies a significant proportion of the site.
- 1.21 As set out in paragraphs 1.8 and 1.9 above all former gasworks sites require extensive remediation works to make the land safe for redevelopment and public access. This process involves the complete removal of the upper layers of soil and existing vegetation – the very features underpinning the SINC designation within the evidence base¹⁴.
- 1.22 As demonstrated at Bromley by Bow Gasworks through the extant planning permission (ref. 23/02033/OUT), ecological features have to be removed to allow safe redevelopment (see Figure 4 – consented masterplan), retaining such designations conflicts with the practical realities of remediation and delivering thousands of new homes on brownfield land within the Borough. While St William remains committed to delivering biodiversity enhancements, in these instances they have been forced to consider a Biodiversity Strategy that considers a combination of both on and off-site measures in order to meet biodiversity net gain requirements. Once the development is in place the existing SINC boundary will no longer reflect what is on site. It is therefore suggested that the boundary is revised in the Emerging Local Plan to reflect the approved plans, retaining the Riverside Park at the western end of the Site as SINC, and adjusting areas of SINC at the eastern end that previously related to existing vegetation on site which will instead accommodate new buildings and new open space and public realm.

¹⁴ EB070 – NeB28, NeB31 and NeB25

Figure 3 – Former Bromley-by-Bow Gasworks Existing and Proposed SINC Designation

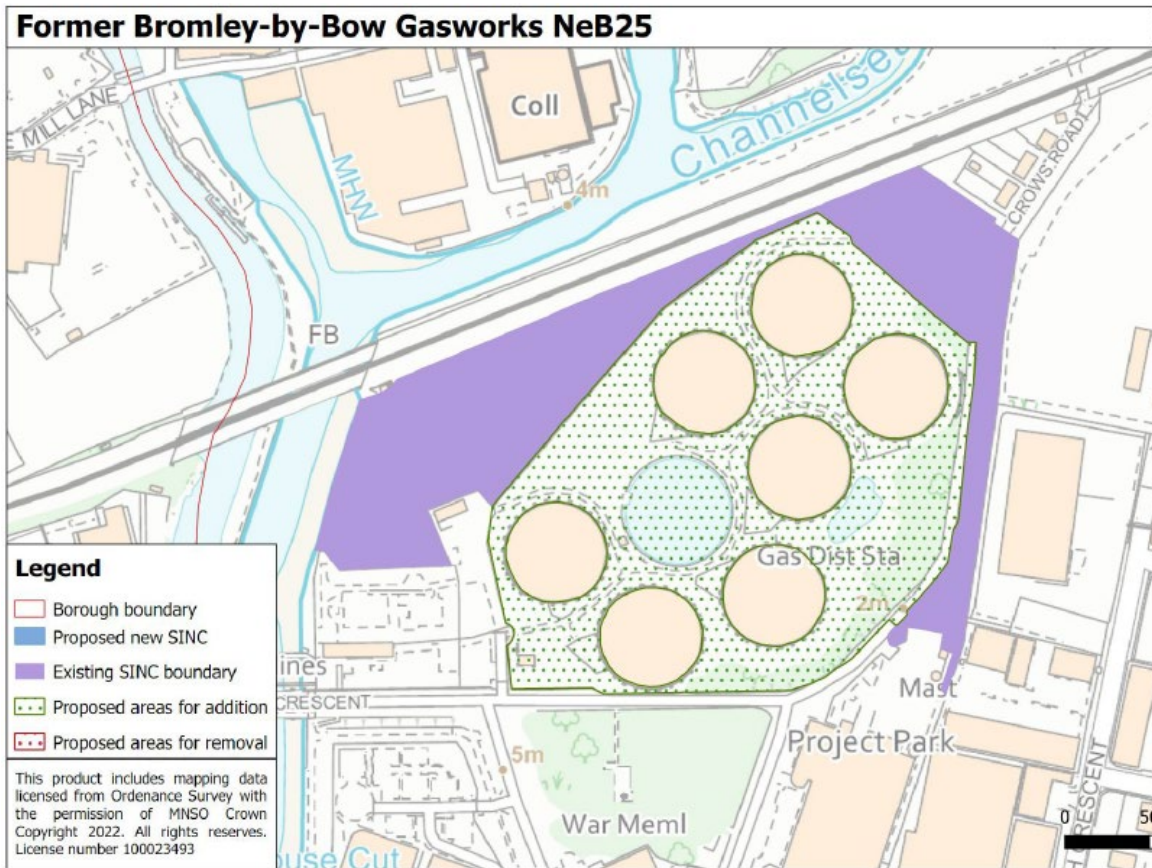


Figure 4 – Bromley by Bow Consented Illustrative Masterplan



East Ham

- 1.23 The incompatibility of the SINC at East Ham Gasworks is detailed in full in Paragraph 1.12.5 of the 6th November 2025 submission to Matter 4 Q4.15, where it details how SINC is incompatible with the Site Allocation (N13.SA3) because redevelopment is required to enable the site to be safe for public access, which requires remediation to address existing contamination. This will result in the removal of the top part of the made ground and the identified existing habitats.

Beckton Riverside

- 1.24 Beckton Riverside is an allocated site (N17.SA1) within the Royal Docks and Beckton Riverside Opportunity Area, one of the largest growth areas in London.
- 1.25 Resolution to grant planning permission was secured in October 2025 for the Beckton Riverside Phase 1 proposals, which will bring forward development that would conflict with this proposed SINC designation and policy, as proposed within the Regulation 22 Local Plan (see Figure 5). The proposal for a SINC at Beckton Riverside is therefore not a sound approach as it conflicts with the Local Plan designation for the Site and is not deliverable. The Beckton Riverside Phase 1 proposals will deliver biodiversity net gain in line with statutory requirements, with specific details secured as part of the s106 Agreement, which will enhance biodiversity both on and off-site. The proposed SINC designation is not considered appropriate nor deliverable and St William consider the statutory biodiversity net gain requirements are sufficient in achieving the ecological aspirations of the Borough.

Figure 5 – Beckton Riverside SINC Designation

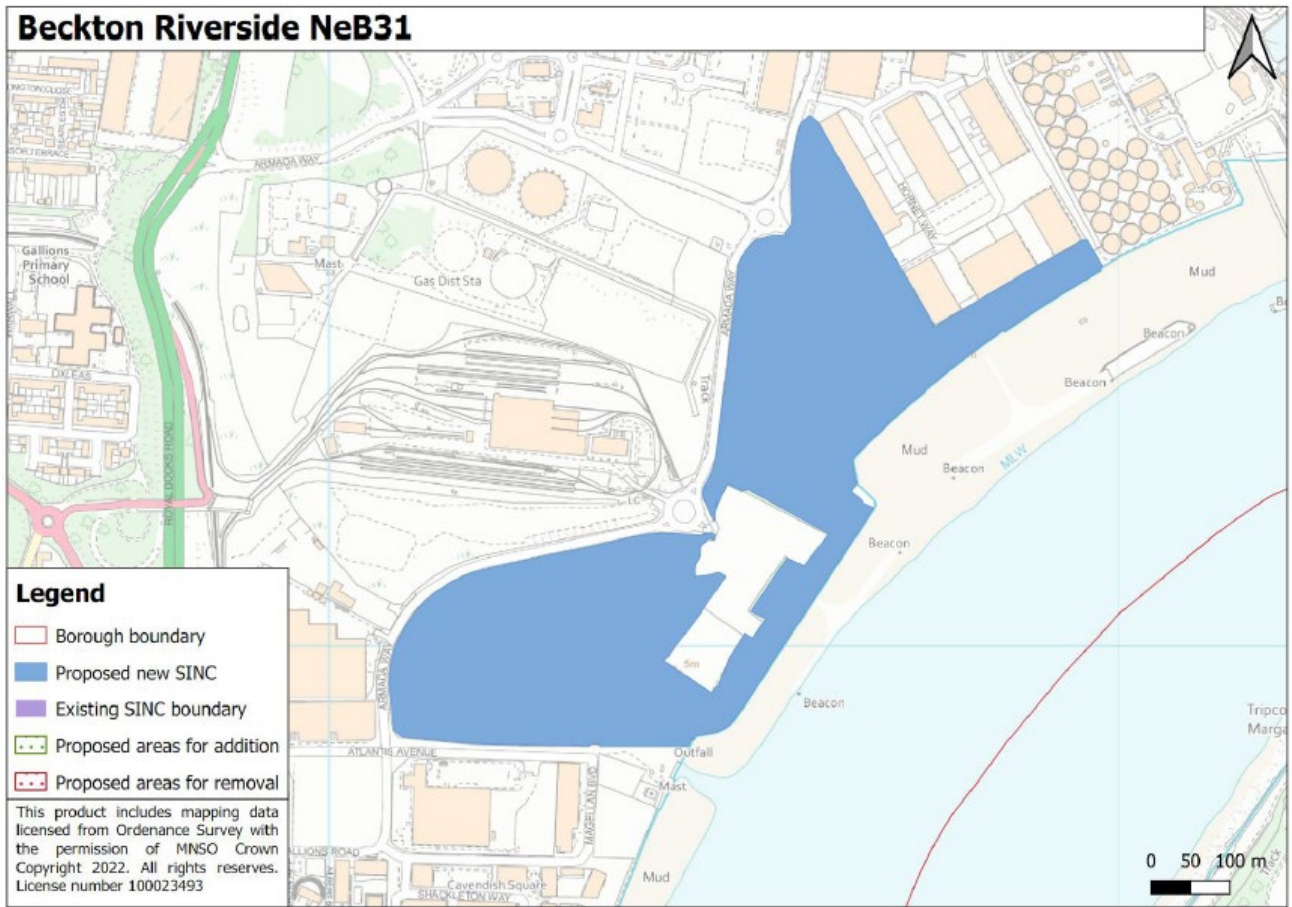


Figure 6 – Beckton Riverside Consented Illustrative Masterplan



b) The requirement in part 3 for development in areas deficient in access to nature to deliver new or improved green or water spaces that would qualify as a Site of Importance for Nature Conservation.

1.26 This approach is considered unsound and does not align with regional or national policy. This approach is considered unnecessary, particularly in light of national requirements for all developments to deliver biodiversity net gain. Per London Plan Policy G6 (D), development proposals should be 'informed by the best available ecological information' on a site-by-site basis. They should not be led by desk-based evidence base¹⁵ that proposes a SINC as a result of deficient green space in the locality. This component of the policy should be removed as it is not 'positively prepared'¹⁶ in respect of meeting objectively assessed needs.

c) The requirements in part 4 relating to biodiversity net gain.

1.27 The policy establishes a requirement for a minimum 10% Biodiversity Net Gain (BNG), to be delivered on-site where possible, and if not, off-site within the Borough before considering

¹⁵ EB070

¹⁶ Framework Paragraph 36 a

locations outside it. It further specifies that out-of-borough sites will only be accepted where it can be demonstrated that there are insufficient sites and credit schemes within the Borough to achieve the required net gain. This does not align with national biodiversity policy which states that off-site mitigation should be delivered in the same 'National Character Area', rather than being on a borough-by-borough basis. While St William supports the principles underpinning this policy, its effectiveness depends on a comprehensive assessment of available and potential off-site habitats within the Borough to confirm their suitability for BNG delivery. Further, the policy does not account for site specific issues such as remediation and viability. St William has therefore recommended revising the policy wording to remove reference to "insufficient sites," placing greater emphasis on credit schemes instead. This change would better reflect current practical experience gained through the preparation of Biodiversity Strategies for Bromley by Bow (23/02033/OUT) and Beckton Riverside (24/00989/OUT).

d) Do part 7, and the associated implementation guidance, need to be modified to ensure that it is effective in preventing adverse impacts on the integrity of the Epping Forest Special Area of Conservation?

- 1.28 Part 7 of the policy concerns the protection and enhancement of the Epping Forest Special Area of Conservation. The Regulation 22 iteration of the Local Plan omitted the 'provision of Suitable Alternative Natural Greenspace'. It should be reasonable to expect that on-site measures could sufficiently meet the policy's objectives of mitigating recreational pressure, particularly developments which offer significant offer of public realm and leisure. This approach is even considered as effective in the evidence base¹⁷. It is therefore requested that this approach, which more aligns with a design-led site-by-site consideration is embedded back into the policy wording.
- 1.29 Tracked changes to the policy are outlined in **Appendix 2**.

Policy GWS5 Play and informal recreation for all ages

Q12.5 Is policy GWS5 justified and consistent with national policy and the London Plan? In particular, will it be effective in helping to meet the particular needs for recreational space and sports facilities for young people and teenagers?

- 1.30 Draft Policy GWS5 should be revised to align with London Plan Policy S4, B(2) which applies a target of 10sqm of playspace per child alongside a qualitative assessment of play-space quality.
- 1.31 Draft Policy GWS5 should provide an expectation that play space is to be provided on site, wherever possible, with greatest priority for on-site delivery towards the Local Area of Play (LAP) for younger children.
- 1.32 Where developments are unable to accommodate elements of play-provision on-site, an off-site contribution will be supported where there is an identified need.

¹⁷ EB071 Paragraph 1.21

1.33 Off-site contributions towards play-space must be considered in overall viability terms with flexibility applied.

Appendix 1 – Policy GWS1 Tracked Changes

GWS1: Green spaces

1. Development should provide or help to deliver easy access to a network of high-quality green spaces. This will be achieved through:
 - a. protecting existing green space to ensure there is no net loss, except where it meets the criteria set out in part 3 below; and
 - b. maintaining the open character of ~~Metropolitan Open Land and~~ Green Belt in accordance with ~~the London Plan (2021) and~~ national Green Belt policy; and
 - c. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing green space; and
 - d. ensuring development next to green space does not negatively impact its functionality, connectivity, quality and accessibility; and
 - e. maximising opportunities to deliver new and improved green space (including playing fields and ancillary sporting facilities), with particular focus on the locations which will experience the highest level of need over the plan period as set out in the Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~ and the Playing Pitch Strategy ~~(2024)~~ **(2025)**; including the requirements of the neighbourhood policies, site allocations and Local Plan Policies H11 and D2; and
 - f. requiring development referable to the Mayor of London, or where a specific green space need has been identified by the Council, including in the site allocations, to provide on-site publicly accessible green space; and
 - g. requiring all development to consider at the earliest opportunity the form, function, and extent of green infrastructure opportunities, to maximise urban greening and improvements to Newham's network of green links as part of schemes; and
 - h. requiring major development to demonstrate an integrated approach to green infrastructure ~~in a Design and Access Statement~~.

2. Existing playing fields will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that:
 - a. the existing playing field is no longer required, as demonstrated by an assessment that the existing use is surplus to current and future needs; or
 - b. the development is for ancillary facilities supporting the principal use of the site as a playing fields, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use; or
 - c. the development affects only land incapable of forming part of a playing pitch and does not negatively impact the pitch or ancillary facilities; or
 - d. the area of playing field to be lost as a result of the development will be replaced, prior to the commencement of the development, by a new area of equivalent or better quantity and quality playing field in a suitable location; or
 - e. the development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field; and
 - f. no adverse harm is demonstrated in a Social Value and Health Impact Assessment (see Local Plan Policy BFN3).

3. Developments on green space ~~(excluding Metropolitan Open Land and Green Belt)~~ will only be supported in exceptional circumstances and very special circumstances for Metropolitan Open Land and Green Belt where:
 - a. it will not create or increase publicly accessible green space deficiency (at any scale); and

- b. replacement green space is provided in Newham, which provides equivalent or better functionality, quality and quantity in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit; or
 - c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents; or
 - d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and
 - i. delivers a high standard of design which complements the character and appearance of the green space; and
 - ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and
 - iii. is designed for people of all ages and physical abilities.
4. Where a development is providing publicly accessible green space, it should:
- a. deliver welcoming spaces with a high standard of design which complements the local character and which are designed to be enjoyed by people of all ages and physical abilities; and
 - b. be co-designed in consultation with local people, early on in the preparation of an application, to bring local views into the development of the space; and
 - c. maintain, and maximise opportunities to deliver improvements to active travel and the borough's network of green links; and
 - d. maximise biodiversity, delivering a minimum 10 percent Biodiversity Net Gain in a way that is particular to the local need and environmental character (see Local Plan Policy GSW3); and
 - e. maximise tree planting to contribute to an increase in borough canopy cover (see Local Policy GWS4); and
 - f. demonstrate how landscaping choices respond to the climate emergency; and
 - g. demonstrate how the scheme improves local air quality, through species selection and the layout of landscape features; and
 - h. integrate Sustainable Urban Drainage Systems (see Local Plan Policy CE7); and
 - i. evaluate Newham's Playing Pitch Strategy ~~(2024)~~ **(2025)** and deliver new playing field provision if required; and
 - j. integrate play and space for informal recreation (see Local Plan Policy GWS5); and
 - k. integrate community and/or food growing opportunities, where feasible and practical; and
 - l. incorporate off-lead dog play and exercise space, where space allows.
5. It is expected that new green space on site allocations or space ~~which will either~~ function as a local park and managed by the ~~will be transferred into the Council~~ or will remain in private ownership 's ownership. A commuted sum, to cover the cost of maintenance over a period of 15 years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted by the Council, management details will be provided a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.

Planning Obligations

- Replacement off-site green space, with an appropriate Maintenance and Management Plan, will be secured if loss and replacement is considered acceptable.

- Contributions may be secured from residential development which generates additional demand for playing fields and ancillary sporting facilities but where a new playing pitch is not being delivered on-site.
- Securing a 15-year maintenance financial contribution may be required if the new publicly accessible green space is adopted by Newham Council.

Justification

Newham's green spaces offer opportunities for social interaction and, in a densely populated borough, give a valued link to nature and a place of quiet retreat as well as a place of learning. There are also economic benefits, with beautiful green and water spaces encouraging people to spend time and money in a place and helping to generate and sustain green economy jobs.

Newham's green spaces are highly treasured by those living in the borough, and parts of the borough appear to be very green, however the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space.

Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Beckton, for example, is relatively well served with publicly accessible green space, with a rate of 2.2515 hectares per 1,000 residents, significantly above the borough average. In contrast, Canning Town South has a rate of just 0.3320 hectares per 1,000 residents³⁸.

Over the Plan period, Newham's population is projected to increase by just over 257 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038.

In order for Newham to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 686 hectares of additional publicly accessible green space ~~so as to sustain provision at the 2023 standard.~~

Newham has 115 allotments and community growing spaces with a total area of 17.88 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.0549 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

With a relatively low level of publicly accessible green space provision, when compared to other London boroughs, it is vital that we seek to deliver new and publicly accessible open spaces. We must also take every available opportunity to green the urban environment.

Of equal importance over the Plan period will be the protection of the spaces we already have, making sure we take a sensitive approach to their improvement. How well a green space is designed and the

³⁸ Please note, the Green and Water Spaces Strategy (2024) uses Newham's pre-2022 Ward boundaries. The Wards were revised in 2022 but demographic data is currently unavailable for the new boundaries.

opportunities for activities to take place in it can encourage more physical activity and benefit social connection and mental health.

Playing fields and pitches play a vital role in building healthy neighbourhoods, contributing to physical, mental and emotional wellbeing. Without access to these spaces, the quality of life and wellbeing of our residents is reduced. The borough has identified playing pitch deficits for football, cricket, rugby union and tennis. Newham’s Playing Pitch Strategy (~~2024~~)(**2025**) has established that the existing shortfalls identified can be met by better utilising current provision. As such, there is no present requirement for the creation of additional provision. However, with shortfalls existing, there is a clear need to protect all existing provision until all current and future demand is met (and with clear spare capacity established). There is also a requirement to replace provision to an equal or better quantity and quality before it is lost.

Implementation

ALL	<p>For the purpose of the Local Plan, green space is defined as space in either public or private ownership, which can have unrestricted access, partially-restricted access or restricted access. This includes all vegetated open space of public value (whether publicly or privately owned), including:</p> <ul style="list-style-type: none"> • parks, • woodlands, • nature reserves and other natural areas with wildlife conservation and other benefits such as storing flood water, • sports fields, and spaces which offer opportunities for sport and recreation, • play space, • grassed areas, • growing space (including allotments and community gardens), • green corridors (paths, rivers, railway embankments and cuttings, roadside verges, canals, parks and playing fields etc.), • derelict, vacant and contaminated land which has the potential to be transformed. <p>These spaces are considered green space whether or not they are accessible to the public but it does exclude private residential gardens.</p>
GWS1.1	<p>This policy seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development.</p> <p>Over the Plan period we will:</p> <ul style="list-style-type: none"> • maintain 0.72 hectares per 1,000 residents of publicly accessible green space, • maintain 0.0549 hectares per 1,000 residents of allotment and community garden space. <p>Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings.</p> <p>Functionality</p>

Any new or enhanced green space should adopt a multi-functional approach to its design. This is to ensure that public space can provide as many different benefits as possible, whether they are direct benefits to people (e.g. leisure and recreational spaces) or indirect benefits (e.g. carbon sequestration and biodiversity connectivity).

The Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~ sets out how the functionality of a green space will be considered. Applicants must demonstrate the elements a green space (existing and/or proposed) and clearly set out how the development proposal will enhance its functionality.

In addition to these functionality considerations, new or enhanced publicly accessible green space should also demonstrate how it meets the eight principles set out in the [Public London Charter \(2021\)](#). This includes ensuring public space is primarily offered for use by the public free of charge.

Development next to green space must not negatively impact:

- views into and out of green space
- provision of natural light
- the experience of people already using the space or the biodiversity value of the space due to intensification of use, with consideration to existing maintenance budgets

Connectivity

To deliver improvements to connectivity, opportunities for new green links should be maximised between green spaces by creating more legible and greener routes along streets and through development sites along the link, especially where Low Traffic Neighbourhoods are being implemented. The Green and Water Strategy (2024) sets out opportunities to improve green links in Newham. These have been reflected in the Local Plan Neighbourhoods chapter and relevant site allocations. Housing estates can also play a role in the creation of green links.

Accessibility

Access points and public access to green space should be protected, enhanced, and created. Walking and cycle routes along or through green spaces should be improved and, where possible, expanded to provide improved wayfinding, safety, and better links to the existing transport network and other green spaces. The design of routes to, and within, green space must also improve equity of access.

Delivery of new and improved publicly accessible green space

Areas experiencing public ~~open~~ green space and community growing space (including community growing and allotments) deficiency are set out in the Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~.

Newham's Playing Pitch Strategy ~~(2024)~~ **(2025)** sets out the need for playing pitches over the plan period. We will have regard to [Sport England's Sports Pitch Calculator](#) and the findings of the Playing Pitch Strategy ~~(2024)~~ **(2025)** to determine an appropriate amount and type of contribution or provision of playing pitches with new residential development. For large-scale residential development, it may be considered appropriate to seek on-site provision of sports pitches. Where new pitches are determined as being required, consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing

facilities. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for the relevant sports.

Contributions may be sought, for residential development which generates additional demand for playing fields and ancillary sporting facilities but where a new playing pitch is not being delivered on site. Contributions will be sought to enhance existing provision of playing pitches, based on additional demand generated by new residential development and in line with Local Plan Policy BFN4 and the Playing Pitch Strategy ~~(2024)~~ **(2025)**.

The Plan's neighbourhood policies and site allocations give further detail of where new publicly accessible green space, community growing space and playing pitches should be delivered.

Applications for development referable to the Mayor of London, or where a specific green or water space need has been identified by the Council, including in the site allocations will be required to provide publicly accessible green space. The need to provide this green space has been established through the work undertaken for Newham's Green and Water Infrastructure Strategy (2024~~5~~) to understand where additional publicly accessible green space is required to maintain 0.72 hectares per 1,000 residents of publicly accessible green space; and where new community growing space is required to maintain 0.05~~49~~ hectares per 1,000 residents of allotment and community garden space.

Local Plan Policy H11 sets out the external communal outdoor space requirements for residential development. Where site allocations are required to deliver publicly accessible green space, this should be in addition to the requirement to deliver external communal amenity space.

Local Plan Policy D2 sets out the public realm requirements for a development. Policy GWS1 and D2 are complementary and must be considered together.

Early consideration of green space

The Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~ should be consulted early in the preparation of an application, ideally before the pre-application stage, so that it can inform the design of the scheme. Applicants are expected to design green infrastructure into the scheme from the earliest possible stage. Green space is integral to the success of a development and should not be seen as an 'add on' at the end of the design process. Consideration of green infrastructure opportunities from the outset requires developments to make green space a central part of masterplanning, in line with Local Plan Policy BFN2. More guidance on ways to incorporate urban greening and deliver green links is provided in the Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~.

Urban greening can include features such as street or balcony planters, roof gardens, podiums and green walls.

Taking an integrated approach

Major development proposals should demonstrate in a Design and Access Statement how the scheme takes an integrated approach to green infrastructure. Taking an integrated approach to green infrastructure means considering the site in its wider

	<p>green infrastructure context and considering how the site can optimise existing natural and green assets, through improving their size or functionality or connectivity and address any shortfalls in the types of green infrastructure in the site and wider area.</p> <p>Schemes which impact existing green space and/or provide new green space should provide to the Council and Greenspace Information for Greater London CIC compatible data on the existing and proposed landscaping elements.</p> <ul style="list-style-type: none"> • Space type and the size of each green space provision (based on Greenspace Information for Greater London CIC typologies), • Details of any access restrictions (unrestricted, limited and restricted) including overnight closures, • Living building features (including green roofs), • Water space (see Local Plan Policy GWS2), • Public realm – hard landscaping, • Site facilities e.g. play spaces, benches, drinking fountains, • Site owner and manager. <p>Information on data standards can be found on the Greenspace Information for Greater London CIC website: https://www.gigl.org.uk/recording-surveying/links-and-resources/survey-data-standards-and-guidance/.</p> <p>Please also see Natural England’s Green Infrastructure Framework (GIF), in particular the Green Infrastructure Planning and Design Guide: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</p>
GWS1.2	<p>Surplus to current and future needs</p> <p>An assessment should follow Sport England’s latest Playing Pitch Strategy guidance or an alternative methodology acceptable to Sport England. The assessment of need should provide a robust and carefully documented assessment of the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision.</p> <p>Ancillary facilities</p> <p>The provision of new or enhanced ancillary facilities is supported and encouraged. They can play an important role in helping people to become and stay active as well as improving the use and viability of the playing field for sport. Facilities should be of an appropriate scale and are encouraged to comply with relevant Sport England and national governing bodies of sport design guidance. They should have no significant detrimental impact on the principal use of the site as a playing field and its ability to accommodate playing pitches.</p> <p>Affecting land incapable of forming a playing pitch</p> <p>The development of minor parts of a site unsuitable for playing pitches (e.g. frontage or steep sloping land) can sometimes provide a way to enhance its sporting use. However, the development should only affect only land incapable of forming part of a playing pitch and it should not:</p> <ul style="list-style-type: none"> • reduce the size of any playing pitch; • result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); • reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality; • result in the loss of other sporting provision or ancillary facilities on the site; or

	<ul style="list-style-type: none"> • prejudice the use of any part of a playing field and any of its playing pitches. <p>Replacement playing field</p> <p>Where a replacement area of playing field and associated facilities can be provided which are equivalent or better than the existing area of playing field and its facilities, it may be beneficial to sport to take this opportunity. The new area of playing field should be:</p> <ul style="list-style-type: none"> • of equivalent or better quality, and • of equivalent or greater quantity, and • in a suitable location, and • subject to equivalent or better accessibility and management arrangements. <p>Benefit the development of sporting use</p> <p>There may be occasions when the development of a new or extended indoor or outdoor facility for sport, which is to be fully or partly located on an area of playing field, can be judged to be sufficiently beneficial to the development of sport in the local area as to outweigh the detriment caused by the loss of the area playing field, or the impact on the use of the remaining playing field or pitches. The potential benefit of any new or extended sports facility may include whether the facility:</p> <ul style="list-style-type: none"> • meets an identified local or strategic need, as set out in the Playing Pitch Strategy (2024)-(2025) and/or a sports national governing body strategy (rather than duplicating existing provision); • fully secures sport-related benefits for the local community; • helps to meet identified sports development priorities • complies with relevant Sport England and national governing bodies of sport design guidance; • improves the delivery of sport and physical education on school sites; and • is accessible by alternative transport modes to the car. <p>Please see Sport England’s Playing Fields Policy and Guidance (2018) for further details.</p> <p>A Social Value Health Impact Assessment (see Local Plan Policy BFN3) is needed to support any application for a loss, reduction, replacement, reconfiguration or relocation of a playing pitch.</p>
GWS1.3	<p>For applications on, or impacting Metropolitan Open Land (MOL) or Green Belt please refer to GWS1.1.</p> <p>For applications on, or impacting playing pitches please refer to GWS1.2.</p> <p>It is important that everyone living in Newham has the opportunity to access green space within walking distance from their home. This is a key part of delivering a network of well-connected neighbourhoods.</p> <p>For the purpose of this Local Plan, the scale of a publicly accessible green space follows the hierarchy set out in Table 8.1 of the London Plan (2021) and includes:</p> <ul style="list-style-type: none"> • Regional Park (400 hectares) • Metropolitan Park (60 hectares) • District Park (20 hectares) • Local Park and Open Spaces (2 hectares) • Small Open Spaces (under 2 hectares) • Pocket Parks (under 0.4 hectares)

- Linear Open Spaces

An application which increases the severity or extends an area of deficiency, at any of the above scales, will not be permitted. It is important to realise that it is not acceptable to offset different scales of open space. For example, an application which will see an increase in Pocket Park deficiency, in a location where there is an excess of space at the District Park scale would not be permitted. These two spaces provide different experiences and meet different user needs.

In the first instance replacement green space should be provided on site. If this is not possible, replacement space should be directed to the development's existing well-connected neighbourhood. Only when this is not possible should space be provided in another part of Newham. If replacement space must be provided outside of the development's well-connected neighbourhood it must be directed to an area experiencing **open green** space deficiency. To demonstrate the acceptable location of proposed replacement off-site green space development, proposals must include the submission of up-to-date spatial mapping of the 15 minute green space network. This mapping exercise must identify the development site location in the context of the replacement green space location (including town centres) within a 15 minute walking distance (identified using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users) of the site. This will demonstrate the suitability of the replacement site in relation to the existing green space.

Many of Newham's housing estates include areas of communal amenity green space with limited function. Maximising the range of benefits this green space provides has the potential to improve the function and overall resilience of the borough's green infrastructure. Key interventions may include, but are not limited to:

- improving habitat for wildlife to improve access to nature,
- transformation of underused areas of hard surface to create new communal green space,
- structural planting to provide a barrier to air and noise pollution,
- planting trees and other vegetation to create cool, quiet spaces,
- raingardens to store and release storm water,
- run-off creating community food-growing areas.

Changes to the existing green space on housing estates will need in-depth consultation with residents and should respect the role of the existing landscape to provide privacy and amenity space for residents.

It will only be appropriate to allow a net loss of green space where it can be demonstrated that it will lead to the provision of facilities that will improve the way people can use and enjoy a green space. Suitable enhancements may include, but are not limited to: drinking fountains, cafes, public toilets, art, and interventions to improve nature interpretation or to enhance historical features, outdoor play, and fitness equipment. Importantly, any such additions should not have a negative impact on wildlife and biodiversity.

The development or enhancement of existing outdoor sport and/or recreational facilities on green space must be for green space dependent uses and, should be of an appropriate scale and be developed in accordance with Local Plan Policies SI2 and SI3.

	<p>Green space dependant uses can include, but are not limited to sports pitches, outdoor classrooms or cultural uses such as an amphitheatre.</p> <p>Please also see Natural England’s Green Infrastructure Framework (GIF), in particular the Green Infrastructure Planning and Design Guide: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</p>
GWS1.4	<p>We will always seek new publicly accessible local park (2 ha), where space allows. However, the creation of small open spaces (under 2ha), pocket parks (under 0.4 ha) and opportunities for urban greening throughout the borough is of equal importance. These spaces provide a patchwork of green stepping stones to complement our larger green spaces. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> • the development of new pocket parks to serve the needs of the borough’s network of well-connected neighbourhoods where there is a lack of local open space and in locations where people do not have access to private gardens, • underutilised spaces, such as surface level car parks and left-over land parcels should, wherever possible, be repurposed to provide open space and/or local community / food growing opportunities, • the creation of new publicly accessible roof gardens, with community/food growing opportunities, where space at ground level is especially limited. <p>Applicants should refer to the priorities and green space needs set out in Newham’s Green and Water Infrastructure Strategy (2025) (2024).</p> <p>New open space should normally be provided as publicly accessible green space. New or improved hard landscaped public space, such as a public square, may be considered appropriate in certain high footfall areas. This will be assessed on a case-by-case basis. Where green space is not possible, development should maximise urban greening features such as planting and permeable paving.</p> <p>Development must consider the following principles when improving existing or delivering new green space: High quality and welcoming</p> <ul style="list-style-type: none"> • be distinctive and welcoming – encouraging people to stay, • be distinctive and designed to create a 'public welcome' and promote access for all, encouraging people to stay, • be designed and managed to meet diverse and changing needs of Newham’s population, • address the particular needs of existing and emerging local community, • provide free to-access and accessible places to sit, designed to promote social interaction and informal eating and meeting, • deliver a place that is inclusive of all genders and protected characteristics, • be designed for effective management and maintenance, • have clear entry points with signage, which is attractive, clear, and well located, • be overlooked, • avoid rigid boundaries, where it is safe to do so, by blurring the boundaries between park and built environment, by greening the public realm surrounding parks and creating more seamless transitions between park and street, • provide generous seating and social space for children, young people, and adults, including provision of seating in the shade,

	<ul style="list-style-type: none"> • provide shade, shelter, and lighting suitable to the local environment, • meet the GLA Cool Spaces criteria, including but not limited to providing public toilets or clear signage to nearby facilities and access to free drinking water, • be capable of changing and evolving over time; <p>Co-designed</p> <ul style="list-style-type: none"> • be co-designed with residents from the outset. Designs should be sensitive to any existing function of green spaces, • co-design should include activities to target population groups who are least often heard by the council, who use green spaces least, or who have specific needs. This may include children and young people, older people, disabled people, or other groups, • meaningful, inclusive, and diverse co-design can help ensure spaces achieve their intended outcomes, meet the needs of those who use them, and improve equity of access, with subsequent benefits to health inequalities; <p>Connectivity</p> <ul style="list-style-type: none"> • deliver an improved network of green grid links in line with the Green and Water Infrastructure Strategy (2025) (2024) to enhance access to key destination points (town centres, community facilities and publicly accessible green spaces) and to and along water spaces, • create/improve links with other green infrastructure and permeability with the wider area be located on safe routes and minimise the number of crossings to access them, • provide ecological corridors for wildlife, • provide clear wayfinding / signage, • improve habitat for wildlife, • cycle and pushchair storage; <p>Climate emergency</p> <ul style="list-style-type: none"> • increase sustainability benefits, including urban cooling, provide shading and sustainable drainage, including the use of permeable surfaces and use of sustainable materials, • consider the suitability of the planting for the climate – thinking about drought impact, waterlogging and the potential for warmer and wetter winters and hotter summers, • rising temperatures caused by climate change is leading to longer allergy seasons and worsen air quality. Species selection should take this into account and seek to mitigate this impact; <p>Biodiversity (see also Local Plan Policy GWS3)</p> <ul style="list-style-type: none"> • maximise biodiversity benefits and access to nature, by incorporating areas of biodiversity that complements, and where possible provides links to, the surrounding habitats, • increase the structural and species diversity of vegetation; • provide trees, bushes and other plants which will thrive in the local conditions, will attract wildlife, provide interest, shade and where appropriate species which provide berries for birds, • maximise the inclusion of plants for pollinators and beneficial insects (with year-round benefits);
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	<p>Air quality (see also Local Plan Policy CE6)</p> <ul style="list-style-type: none"> mitigate the impact of air pollution by following the guidance in the Greater London Authority publication: Using Green Infrastructure to Protect People from Air Pollution (2019); <p>Sustainable Urban Drainage Systems (see also Local Plan Policy CE8)</p> <ul style="list-style-type: none"> maximise opportunities to reduce the adverse impacts of traditional surface water systems; remove pollutants from urban run-off at source; and to combine surface water management with green space for amenity, recreation and wildlife benefit; <p>Play and informal recreation (see also Local Plan Policy GWS5)</p> <ul style="list-style-type: none"> accommodate and encourage physical activity for all, promoting walking, cycling and social interaction, provide shade and shelter, provide features for socialising (seating, gathering places), provide opportunities for the space to be used flexibly for different purposes / events, consider informal sports facilities (ball courts, wheeled sports facilities), provide free Wi-Fi and spaces for sitting and places to study, maximise the range and inclusivity of play, including: <ul style="list-style-type: none"> fixed play opportunities, non-prescriptive play features (for example: boulders, hillocks, logs, trails, sand, water, loose play material and objects), provide suitable lighting. This is particularly important for the accessibility of outdoor sports facilities. The form of lighting will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding area, and not to cause a demonstrable harm to the local community or biodiversity. The hours of use of lighting should be agreed early in the planning process; <p>Community /food growing</p> <ul style="list-style-type: none"> maximise opportunities to provide and improve access to community and food growing spaces; <p>Dogs</p> <ul style="list-style-type: none"> where space allows, the provision of areas for dogs to be off-lead separated from other park users and activities.
GWS5	<p>Management Plans and agreed uses should be considered at the early stages of a project and should be informed by an understanding of the site and the awareness of any long-term capital funding required for the governance and maintenance of the proposal. Management should enable lasting flexibility of use and continued access to shared and communal spaces.</p> <p>Where it is agreed that the publicly accessible green space will not be adopted a Maintenance and Management Strategy will be secured to ensure the long-term and suitable maintenance and management of the site and its infrastructure</p> <p>Commitment to Public London Charter will be secured where delivering new publicly accessible green space that is privately owned and managed.</p>

Evidence base

- Green and Water Infrastructure Strategy, ~~Jon Sheaff and Associates~~ **Arkwood** with London Wildlife Trust **(2025)** ~~(2024)~~
- Newham Metropolitan Open Land Review ~~(2024)~~**(2025)**
- Newham Sites of Importance for Nature Conservation Review **(2025)** ~~(2022)~~
- Newham Playing Pitch Strategy, KKP ~~(2024)~~**(2025)**
- Greenspace Information for Greater London CIC data records.
- Characterisation Study, Maccreeanor Lavington with New Practice, Avison Young and GHPA (2022)
- [Air Quality Action Plan 2019 – 2024, Newham \(2019\)](#)
- [Climate Emergency Action Plan, Newham \(2020\)](#)
- [Public London Charter, GLA \(2021\)](#)
- [Cool Spaces Criteria, GLA \(2023\)](#)
- [Using Green Infrastructure to Protect People from Air Pollution, GLA \(2019\)](#)
- [Green Infrastructure Framework – Principles and Standards for England, Natural England \(2023\)](#)

Policy Links

Local Plan:

- GWS3: Biodiversity, urban greening, and access to nature
- GWS5: Play and informal recreation for all ages
- CE6: Air quality
- CE8: Sustainable drainage
- Section 4: Neighbourhoods

London Plan 2021:

- G1: Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open space
- G5 Urban greening
- G5 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- S5 Sports and recreation facilities
- SI 1 Improving air quality
- SI 4 Managing heat risk
- SI 13 Sustainable urban drainage

Appendix 2 – Policy GWS3 Tracked Changes

GWS3: Biodiversity, urban greening, and access to nature

1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity (green and water). This will be achieved through:
 - a. protecting existing habitats and features of biodiversity value. If this is not possible, replacing lost features within the development site, delivering improved biodiversity value; and
 - b. maximising improvements to existing habitats including:
 - i. the most valuable habitats within existing Sites of Importance for Nature Conservation; and
 - ii. the network of green and water corridors; and
 - iii. creating new wildlife habitats in the borough's larger green spaces to supplement those within the existing Sites of Importance for Nature Conservation network; and
 - c. maximising opportunities to create new onsite habitats and to deliver missing ecological links (green and water); and
 - d. maximising 'living building' elements as a key feature of the site and building design. Appropriate, site considered opportunities should be integral to the design of a development from the outset; and
 - e. maximising biodiversity measures within the London City Airport **Safeguarded Safe-Guarded Area**, whilst also ensuring that the airport is appropriately safeguarded from bird strikes; and
 - f. demonstrating, through a Management Plan, how existing and new areas of biodiversity value will be funded and maintained.
2. Major development irrespective of location, and all development in close proximity to a Site of Importance for Nature Conservation or which is likely to have an impact on protected or a priority species or habitat is required to submit an ecological assessment. Data recorded on the habitat(s) (type and size) and species present currently on site and data on the size and type of green space and 'living building' features proposed should be shared with the Council and Greenspace Information for Greater London Community Interest Company (GiGL).
3. Development in areas deficient in access to nature should deliver new or improved green or water spaces which have intrinsic nature conservation value ~~that would qualify as a Borough Site of Importance for Nature Conservation~~. Where this is not possible development should deliver:
 - a. habitat creation onsite and/or in locations accessible to residents and the wider public; and
 - b. environmental interpretation materials to provoke curiosity and provide information on the green and water space on site and in the wider neighbourhood; and
 - c. improved walking routes and access to nearby accessible Site of Importance for Nature Conservation.
4. Development must deliver a Biodiversity Net Gain of at least 10 per cent. All opportunities should be explored to deliver Biodiversity Net Gain on-site. Where it can be demonstrated that on-site net gain is not possible, applicants must seek to deliver their off-site Biodiversity Net Gain in Newham. Out of borough registered off site Biodiversity Net Gain will only be accepted where it can be demonstrated there are insufficient sites and credit schemes in Newham to deliver the required net gain.

5. Development should meet the London Plan (2021) Urban Greening Factor.
6. Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
 - a. avoid damaging the significant ecological features of the site,
 - b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site,
 - c. deliver off-site compensation, in Newham, of better biodiversity value,
 - d. where appropriate compensation is not possible, planning permission will be refused.
7. The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through:
 - a. developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and
 - b. developments of new net additional residential homes contributing to the delivery of Newham’s Epping Forest Special Area of Conservation Recreation Mitigation Strategy.**
 - ~~b-c. Provision of suitable alternative natural greenspace~~ provision of Suitable Alternative Natural Greenspace.

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Planning obligations

- Funding for delivering or monitoring Biodiversity Net Gain will be secured.
- Contributions towards Epping Forest Mitigation will be secured where required to mitigate the impact of development.

Justification

As an urban borough, Newham’s network of natural spaces act as a green lung; protecting biodiversity by giving much needed space for wildlife (animals, birds, trees, plants, insects and fungi) and as well as reducing air pollution, helping water management and moderating urban temperatures. Having a biodiverse borough means having a rich mix of plants and animals; and this variety and complexity helps nature to thrive.

As the number of homes increases over the Plan period, it will be of fundamental importance to match this growth by protecting and improving existing natural spaces (both green and water) and increasing the amount of habitat creation and through ecologically sensitive landscape design within the urban environment.

The provision of urban greening through new developments and on existing streets will provide benefits to wildlife and people living in Newham. Whilst this may not provide space for recreation, such greening can improve people’s mental health and well-being, enhance the character of the townscape, and provide opportunities for community and food growing.

Green corridors (connecting habitat for wildlife) can significantly improve the capacity of existing parks and nature conservation areas by extending their reach beyond their current boundaries. The provision of green corridors to provide access to existing parks and green spaces via safe and less polluted routes will also help people to access the existing network of green spaces.

Located outside the borough to the north of Manor Park, Epping Forest is the largest green space in London. The Forest is formed of ancient woodland and acid grasslands which cover an area of approximately 2,450 hectares. Two thirds of Epping Forest has been designated as a Site of Special Scientific Interest and a Special Area of Conservation. Epping Forest is a popular visitor destination, including for Newham residents. The rise in visitor numbers to Epping Forest from the surrounding area has led to a need to better balance the ecological needs of Epping Forest. Newham has been working with the City of London and neighbouring authorities in London and Essex to develop a joint governance and delivery approach to the Strategic Access Management and Monitoring Strategy.

Implementation

GWS3.1	<p>The ecological value of existing Sites of Importance for Nature Conservation is maximised when they are connected by areas of complementary or supporting habitats in the form of green corridors or ‘stepping-stones’. This is habitat that allows some species to move through the urban environment. This supporting habitat also provides wildlife with a wider range of opportunities for meeting their foraging or breeding requirements.</p> <p>Green corridors can be created and improved by:</p> <ul style="list-style-type: none"> • creating pockets of wildlife habitat between existing Sites of Importance for Nature Conservation • increasing the species and structural diversity of vegetation in parks, amenity green spaces and the public realm to enable a wide variety of species to move between parts of the Sites of Importance for Nature Conservation network. <p>Living building elements enhance biodiversity, examples of living building elements include, but are not limited to:</p> <ul style="list-style-type: none"> • green and brown roofs, • green walls, • swift bricks and artificial nest sites, • roost bricks for bats and designing lighting in a bat friendly way, • ensuring boundaries allow hedgehogs to move freely, • nature based Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscape form and vegetation. <p>Living building features should be specified in accordance with best-practice guidance. This is available from BS 42021:2022 and from Chartered Institute of Ecology and Environmental Management (CIEEM).</p>
GWS3.2	<p>Applicants should carry out proportionate ecological assessments for major developments, and all development in close proximity to a Site of Importance for Nature Conservation, or for any proposed development which is likely to have an impact on a protected or priority species or habitat, as listed in Section 41 of the Natural Environment and Rural Communities Act. Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here:</p>

	<p>Habitats and species of principal importance in England. It is important to recognise that priority species and habitats may include building-based biodiversity.</p> <p>Ecological assessments must be developed from the earliest stages of the pre-application process and should demonstrate as a minimum how the natural resource will be retained, enhanced and if necessary restored. The requirement for ecological surveys and assessments to be submitted in this policy also applies to refurbishment works which may impact species using the existing building, such as swifts or bats. The scale and detail of the survey will be dependent on the likely impact on biodiversity.</p> <p>The ecology assessment should include:</p> <ul style="list-style-type: none"> • information assessing the characteristics and situation of the site; and details on how the proposals will protect, replace and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species. <p>The ecological assessment should provide to the Council and Greenspace Information for Greater London CIC compatible data on the following:</p> <ul style="list-style-type: none"> • space type and the size of each provision (based on Greenspace Information for Greater London CIC typologies), • details of any access restrictions (unrestricted, limited and restricted) including overnight closures, • water space, • site owner and manager. <p>Information on data standards can be found on the Greenspace Information for Greater London CIC website: https://www.gigl.org.uk/recording-surveying/links-and-resources/survey-data-standards-and-guidance/</p> <p>Ecological surveys to inform the ecological assessment must identify potential development impacts likely to harm the ecology of the site and recommend mitigation and enhancement measures. Where a survey is required, this must occur early in the design process of a proposal and be undertaken by an appropriately qualified ecologist.</p>
GWS3.3	<p>Newham’s Green and Water Infrastructure Strategy (2025) (2024) shows those areas of the borough that are currently under-provided with natural and semi-natural greenspace and Sites of Importance for Nature Conservation. This is known as an area in deficiency of access to nature and they are also mapped on the policies map. They are defined as those parts of Newham where residents do not have adequate access to the natural environment as they live more than more than one kilometre from an accessible borough Site of Importance for Nature Conservation.</p> <p>When bringing forward development in these areas of deficiency applicants should consider whether, through on-site habitat creation and/or ecological improvement of an existing green space, areas of natural greenspace can be established which would meet borough Site of Importance for Nature Conservation criteria.</p> <p>Where this is not possible development should include green links and routes through to allow residents to access the wider network of Sites of Importance for Nature Conservation and greenspaces.</p>

	<p>On-site interpretation boards, to show how habitats contribute to and support the wider biodiversity aspirations of the borough, and visible onsite features such as bird boxes and wildflower planting can help engage local communities positively in new developments. Interpretation boards can ensure best use of green and water spaces; and can help to foster a sense of local pride by helping people to visualise the meaning and significance of new habitats within developments. Interpretation boards should be designed to be accessible (e.g. for visual/hearing impairments, considering reading age, language barriers and use of visuals).</p>
GWS3.4	<p>London Plan Policy 2021 G5 requires all major developments to include urban greening as a fundamental element of site and building design. The policy introduces the use of an Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application.</p> <p>Applicants for major development should use the London Plan Guidance Urban Greening Factor (2023), or subsequent updates, to ensure proposals meet the requirements of London Plan 2021 Policy G5. The guide provides information to help applicants to apply the UGF to proposed developments.</p> <p>Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Development proposals must secure a net gain in biodiversity value, with a clear priority for on-site measures. Development should use the latest Department for Environment, Food & Rural Affairs metric to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should be submitted together with baseline and proposed habitat mapping in a digital format with the application.</p> <p>Any off-site habitats created should be provided in the borough and be located to maximise opportunities for local nature recovery and to improve access to nature.</p> <p>Biodiversity Net Gain should not be applied to irreplaceable habitats. Any mitigation and/or compensation requirements for designated sites should be dealt with separately to Biodiversity Net Gain provision.</p> <p>Applicants should refer to the latest government legislation and guidance and the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to ensure proposed green infrastructure achieves a Biodiversity Net Gain.</p> <p>Please also see Natural England's Green Infrastructure Framework (GIF). The GI Framework provides a number of tool and guides to complement the mandatory mechanisms of Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), which form part of the Environment Act.</p>
GWS3.5	<p>Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Development proposals must secure a net gain in biodiversity value, with a clear priority for on-site measures. Development should use the latest Department for Environment, Food & Rural Affairs metric to quantify the baseline and</p>

	<p>post development biodiversity value of the development site and off-site areas proposed for habitat creation. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should be submitted together with baseline and proposed habitat mapping in a digital format with the application.</p> <p>Any off-site habitats created should be provided in the borough and be located to maximise opportunities for local nature recovery and to improve access to nature.</p> <p>Biodiversity Net Gain should not be applied to irreplaceable habitats. Any mitigation and/or compensation requirements for designated sites should be dealt with separately to Biodiversity Net Gain provision.</p> <p>Applicants should refer to the latest government legislation and guidance and the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to ensure proposed green infrastructure achieves a Biodiversity Net Gain.</p> <p>London Plan Policy 2021 G5 requires all major developments to include urban greening as a fundamental element of site and building design. The policy introduces the use of an Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application.</p> <p>Applicants for major development should use the London Plan Guidance Urban Greening Factor (2023), or subsequent updates, to ensure proposals meet the requirements of London Plan 2021 Policy G5. The guide provides information to help applicants to apply the UGF to proposed developments.</p>
GWS3.6	<p>Newham's Green and Water Infrastructure Strategy (2025) (2024) shows those areas of the borough that are currently under-provided with natural and semi-natural greenspace and Sites of Importance for Nature Conservation. This is known as an area in deficiency of access to nature.</p> <p>Newham's Sites of Importance for Nature Conservation are also mapped on the policies map and detailed in Newham Sites of Importance for Nature Conservation Review (2025). (2023)</p>
GWS3.7	<p>Under the Conservation of Species and Habitats Regulations 2017 Newham has duties to ensure that planning decisions do not result in adverse effects on the Special Area of Conservation. The Habitats Regulations Assessment element of the Local Plan Integrated Impact Assessment has considered the impact of the growth proposed in this plan, along and in combination with other Plans.</p> <p>The need for Mitigation Strategies adopted by the Council to offset the effects of recreational pressure on Epping Forest Special Area of Conservation have been identified. These strategies will be reviewed and updated as required over the plan period. Currently the Council is working with partners to develop a package of mitigation measures which fall into two categories:</p> <ul style="list-style-type: none"> • Strategic Access Monitoring and Management Strategy, which was adopted by Cabinet in July 2022. • Newham Special Area of Conservation Recreation Mitigation Strategy (2025).

	<ul style="list-style-type: none"> • Suitable Alternative Natural Greenspace, which is being developed and will be published as additional guidance.
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Evidence base

- Green and Water Infrastructure Strategy, ~~Jon Sheaff and Associates – Arkwood~~ with London Wildlife Trust **(2025)** ~~(2024)~~
- Newham Metropolitan Open Land Review ~~(2024)~~ **(2025)**
- Newham Sites of Importance for Nature Conservation Review **(2025)** ~~(2023)~~
- Greenspace Information for Greater London CIC data records.
- [Biodiversity Metric, DEFRA/ Natural England](#)
- [Biodiversity Net Gain: Good Practice Principles for Development. A Practical Guide, CIRIA/CIEEM/IEEMA \(2016\)](#)
- [Urban Greening Factor London Plan Guidance, Greater London Authority \(2023\)](#)
- [Urban Greening for Biodiversity Net Gain: A Design Guide \(2021\)](#) Characterisation Study, Maccreeor Lavington with New Practice, Avis and Young, GHPA (2024) [Air Quality Action Plan 2019 – 2024, Newham \(2019\)](#)
- [Climate Emergency Action Plan, Newham \(2020\)](#)
- [Nature Conservation in Newham, Ecology Handbook, 17, London Ecology Unit \(1998\)](#)
- [Lee Valley Regional Park, Landscape Character Assessment and Landscape Strategy, LUC \(2019\)](#)
- [All London Green Grid: River Roding and Epping Forest Area Framework, GLA \(2012\)](#)
- [All London Green Grid: Lea Valley and Finchley Ridge Area Framework, GLA \(2012\)](#)
- [Cody Dock Tidal Lea Ecology Report 2021 – 22, Gasworks Dock Partnership \(2022\)](#)
- Newham’s Biodiversity Action Plan, LUC (2010)
- [Green Infrastructure Framework – Principles and Standards for England, Natural England \(2023\)](#)
- **Lee Valley Regional Park, Biodiversity Action Plan, 2019 - 2029 (2019)**

Policy Links

Local Plan:

- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage

London Plan 2021:

- G5 Urban greening
- ~~G5~~ **G6** Biodiversity and access to nature
- SI 1 Improving air quality
- SI 4 Managing heat risk
- SI 13 Sustainable urban drainage