

# Newham Local Plan Examination Matter 12: Green and water spaces

**Hearing Statement**November 2025



Newham Examination Hearing Statement - Matter 6

### 1. Introduction

- 1.1 This Hearing Statement has been prepared by the London Legacy Development Corporation (LLDC) to respond to matters identified by the Planning Inspector in their Matters, Issues and Questions (MIQs) report concerning the draft Newham Local Plan.
- 1.2 LLDC is a Mayoral Development Corporation that was formed to regenerate the area in and around the Queen Elizabeth Olympic Park (QEOP) following the legacy of the Olympic Games in 2012. Through its urban regeneration projects, the organisation is working on delivering sustainable and thriving neighbourhoods with a focus on housing delivery and good growth. LLDC has a number of strategic sites within the Borough of Newham.
- 1.3 LLDC has been in engagement with the London Borough of Newham ("Newham") throughout the Regulation 18 and 19 public consultations of the draft Newham Local Plan and has also entered into two Statement of Common Grounds (SoCG) with Newham, referred to as Parts 1 and 2. SOCG Part 1 was between Newham and LLDC both as local planning authority and landowner prior to the transition of planning powers from the LLDC back to the neighbouring boroughs at the end of November 2024, with a focus on strategic cross-boundary matters (reference SD058). SOCG Part 2 was between Newham and LLDC as landowner only with a focus on strategic development sites owned and/or managed by LLDC that will be impacted by the proposed policies (reference SOCG004).
- 1.4 The questions under Matter 12: Green and water spaces that the LLDC wishes to provide comments on are as follows:
  - Q12.3(a) Policy GWS3 Biodiversity, urban greening and access to nature

## 2. 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:

- a) Are the Sites of Importance for Nature Conservation designated on the policies map justified?
- 2.1 The proposed Local Plan and associated Policies Map includes an extension to the existing Greenway Site of Importance for Nature Conservation (SINC) designation (referenced as NeB16 in the submitted SINC Review 2025, reference EB070) that encroaches onto one of LLDC's development sites, namely Bridgewater Triangle (BWT).
- 2.2 This development site is also proposed site allocation N8.SA8 Bridgewater Road within the draft Local Plan where a delivery assumption of 680 homes has been estimated by



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Newham, and which we have commented on more specifically in our hearing statement for *Matter 4*: *Neighbourhoods and Allocations*.

2.3 The proposed addition to SINC designation NeB16 at BWT would be inconsistent with both the SINC designation of the adopted LLDC Local Plan and the extant outline consent for development granted in 2023 (reference 21/00403/OUT), where it overlaps with approved development parcels as shown in Figure 1. For completeness, it would also be inconsistent with the much earlier Legacy Communities Scheme (LCS) outline approval for delivery of housing on this site granted in 2012 (reference 11/90621/OUTODA).



Figure 1 – SINC designation overlap

- 2.4 If the proposed SINC designation NeB16 is extended onto the BWT site, it could sterilise the potential to fully develop an area of land that has had planning permission for residential development since 2012. It has also been the subject of extensive preapplication discussions with Newham planning officers since mid-2024 in regard to amendments and reserved matters to deliver 700 homes, which are due to be submitted in early 2026.
- 2.5 The proposed SINC area is where the highest density of development is currently proposed which, in urban design terms, is the most appropriate location for the tallest buildings due to proximity to the railway at the node with the Greenway. Two tall



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standalone buildings, located fully within the proposed SINC, will accommodate approximately 200 of the 700 homes (approximately 30%). A further 30 homes are proposed where the SINC partially overlaps the third building, meaning the designation of the SINC would result in 230 homes not being delivered in the context of the current 700-home scheme. As such, the designation would not only conflict with the site's planning permissions and current proposals but would also undermine Newham's planning aspirations of 680 homes being delivered on the site in the plan period.

- 2.6 At Regulation 18 stage, when LLDC first raised this inconsistency and its potential impact, the published version of the Newham SINC Review (April 2022) provided no substantive evidence for inclusion of this area as an addendum to the existing Greenway SINC. The only reference within that document to areas being added to this SINC referred to locations at Claps Gate Lane and Abbey Lane Gas Depot. Neither of these locations are in proximity to BWT.
- 2.7 Within that document the inclusion of land at BWT within the SINC could at best be covered by a general comment that '...most sites may have had very minor boundary changes as a result of aligning the original SINC boundary to MasterMap'. This offers no substantive justification as to why the SINC is proposed to be amended, especially as the existing boundary within the adopted LLDC Local Plan follows a clear line along the towpath and at the base of the embankment.
- 2.8 A further iteration of the Newham SINC Review (April 2025) has now been submitted as part of the examination's evidence base (reference EB070). This justifies the encroachment as an addendum to the existing Greenway SINC on the grounds that the land is 'ecologically contiguous with the existing SINC'. However, again no substantive evidence to justify this is offered and none was provided to the LLDC during discussions on the SOCG Part 2 (reference SOCG004) prior to the Plan's submission. The April 2025 version of the SINC Review document was also not available for review or comment during previous stages of consultation on the proposed replacement Local Plan. Its inclusion in the submitted evidence base was the first time (that we are aware) that it was available as part of the Local Plan consultation process.
- 2.9 For the reasons set out above, it is considered that the proposed amendment to SINC NeB16 at BWT has not been justified. The boundary should remain as per the current SINC designations of the adopted LLDC Local Plan. This will ensure not only that the value of The Greenway as local green infrastructure will be maintained but that the approved development of the BWT site can be progressed to deliver several hundred homes to the Borough as intended by the adopted LLDC Local Plan, extant planning permissions and as proposed in the Local Plan, together with improved accessibility in this local area.