



Quod

R22 Local Plan

Matter 13: Social Infrastructure

Newham Local Plan

St William Homes LLP

27TH NOVEMBER 2025

Q253076

Matter 13: Social Infrastructure

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 13 Social Infrastructure. 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.

Policy BFN3 Social value and health impact assessments

Q13.1 Is policy BFN3 justified and consistent with national policy and guidance and the London Plan?

- 1.2 The objective of maximising social value and embedding health and wellbeing principles into development is strongly supported (part 1 of Policy BFN3) and is justified and consistent with national policy and guidance and the London Plan in particular paragraph 8 of the Framework and London Plan Policy GG3 (Creating a Healthy City).
- 1.3 However, the specific policy requirements namely within parts 2 and 3 of the policy are not consider necessary or justified and therefore contrary to paragraph 36 of the Framework. Major development proposals are already subject to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations') which determine when an Environmental Impact Assessment is required. Environmental Impact Assessments are the process to evaluate the likely significant environmental effects of a proposed development. It identifies, assesses, and mitigates potential negative impacts and enhances positive ones, ensuring that environmental considerations are taken into account before a decision is made on a planning application. Health and social value issues are already addressed via the EIA process and therefore a separate requirement for a Social Value and Health Impact Assessment (SV-HIA) is duplication and unnecessary.
- 1.4 Furthermore, in line with our response to question 1.7, requirements for specific planning application documents do not belong in the Local Plan and instead supporting guidance or validation checklists that can be updated on a more regular basis should be used. As identified in the Council's response to FPQ1 (ED002), the draft Local Plan contains approximately 60 separate information requirements across emerging policies. This approach is inconsistent with NPPF Paragraph 45 which states that local planning authorities should only request supporting information that is relevant, necessary and material to the application, and should be kept the minimum needed to make decisions.
- 1.5 Policy GG3 of the London Plan does not explicitly require that major development submit a Health Impact Assessment, nor does it set out fixed thresholds in the Plan for when it is mandatory. Policy BFN3 should be revised to only seek the objectives outlined in part 1 around maximising social value and making a positive contribution to the health and wellbeing of our communities. The prescriptive requirements within part 2 and 3 for a SVHIA should be removed.

- 1.6 Introducing unnecessary complexity, and administrative burden, particularly where matters are already addressed through other assessments such as Environmental Impact Assessments has the potential to delay the planning application process which is contrary to the Framework.
- 1.7 The proposed tracked changes to the policy wording of BFN3 is outlined in **Appendix 1**.

Policy SI2 New and improved community facilities and health facilities

Q13.3 Is policy SI2 justified, effective and consistent with national policy and the London Plan? In particular:

a) The requirement in part 2c for community facilities that have 1,000 sqm or more floorspace or a user appeal beyond the local neighbourhood to be located within a town or local centre (unless part 2d is complied with in the case of main town centre use facilities).

- 1.8 Parts 2 and 3 of Policy SI2 are overly prescriptive and not consistent with the Framework¹ or the London Plan².
- 1.9 Both the Framework and the London Plan seek to ensure new community and health care facilities are easily accessible by public transport, cycling and walking. They do not define that they should be located within a town or local centre nor do they define a floorspace threshold. Part 2 of the policy as drafted applies three criteria that does not align with the Framework or London Plan:
1. Specific requirement for facilities to be located in town or local centres
 2. A floorspace threshold that determines where community facilities should be located with no supporting evidence base to explain why that threshold has been selected
 3. The use of the term 'user appeal' with no associated definition
- 1.10 Most London borough Local Plans including the recently adopted Lewisham Local Plan and the draft Local Plans for Enfield and Camden do not include a floorspace threshold (or 'user appeal' reference) for community uses, or a requirement for the facilities to be within a town centre. It is therefore suggested that the floorspace threshold is removed and reference to 'user appeal' is removed.
- 1.11 If the Council wish to prioritise the provision of community facilities within town centres, further flexibility should be incorporated within the policy to acknowledge that community facilities would be appropriate in areas convenient for the communities they serve and where they are accessible however to acknowledge there may be flexibility depending on the type of infrastructure being provided. This is what is reflected in the implementation text and the policy should be updated to align with this.
- 1.12 Paragraph 16 of the Framework seeks to ensure Plans are *"prepared positively, in a way that is aspirational but deliverable"* (part b) and *"contain policies that are clearly written and*

¹ Paragraph 98 of the Framework

² Policies S1, S2 and S3 of the London Plan (2021)

unambiguous” (part d). As drafted the policy is overly prescriptive and therefore not prepared positively, it also contains policy that is not clearly written and ambiguous. It therefore fails to comply with the Framework and amendments are required, which are set out in **Appendix 2**.

b) Part 4 which states that speculative social infrastructure development will not be supported.

- 1.13 The resistance to speculative delivery of new social infrastructure is unclear and therefore does not accord with the Framework.
- 1.14 Implementation text SI2.4 provides some explanation around its intention which is to ensure any proposal for social infrastructure actually meets a need and has considered appropriately the end user(s). Part 1 of Policy SI2 already outlines a requirement for new social infrastructure to be subject to a needs-based assessment at the time of delivery it is therefore not considered necessary to include part 4 as well and it is recommended that this statement is removed.
- 1.15 Part 1 of the policy provides positive support for the provision of social infrastructure where an evidenced need exists. This is consistent with the strategic objectives of the London Plan and national policy promoting sustainable communities.

Policy SI3 Cultural facilities and sport and recreation facilities

Q13.4 Is policy SI3 justified, effective and consistent with national policy and the London Plan?

- 1.16 The principles of Policy SI3 aligns with the Framework³ and the London Plan⁴ in particular part 2 of the policy which acknowledges that provision must be subject to a needs-based assessment at the time of delivery.
- 1.17 Notwithstanding the requirement of this policy and any associated site allocation, an appropriate degree of flexibility must be applied to any requirement for new or re-provided cultural, sports and recreation facilities and regard given to the viability of the development and other competing requirements of the site allocation.
- 1.18 The policy should recognise that major mixed use redevelopment schemes often face significant abnormal and other policy costs which can materially affect scheme viability. To reflect the challenges of viability, the Newham Local Plan should adopt similar wording as provided within the Tower Hamlets Local Plan (Policy D.SG5), which states, *“For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”*.
- 1.19 This consideration is especially relevant to Site Allocation N13.SA3, which is identified as delivering a new cricket pitch as part of its wider redevelopment. The Playing Pitch and Outdoor Sport Strategy (EB046) refers to the disused cricket pitch on site (Leigh Road Gasworks Sports Ground), despite this having only ever operated as *private facility* reserved for the exclusive use of gasworks employees until its abandonment nearly two decades ago.

³ Paragraph 98 of the Framework

⁴ Policy S5 of the London Plan

- 1.20 It has therefore never served the recreational needs of the wider local community, and its reinstatement in accordance with Site Allocation N13.SA3, which is supported in principle, should not be treated as a direct re-provision of a public sporting facility.
- 1.21 Relevant tracked changes are outlined in **Appendix 3**.

Policy SI4 Education and Childcare facilities

Q13.5 Is policy SI4 justified, effective and consistent with national policy and the London Plan? In particular, will it be effective in helping to ensure that the particular educational needs of all sectors of the community can be met?

- 1.22 The overarching objectives of Policy SI4 aligns with the principles set out in the Framework⁵ and London Plan⁶ which seek to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. Part 1 of the policy seeks to do this whilst making it clear that provision of education and childcare facilities is subject to identified need.
- 1.23 However, as drafted a number of policy SI4 requirements are onerous and unjustified with the potential to stifle viability and deliverability of proposals and consequently the timely delivery of any identified social infrastructure including specifically education facilities.
- 1.24 Part 3(a) of the policy seeks to ensure “the appropriately timed delivery of new educational facilities to meet changing pupil needs”. Whilst it is acknowledged that educational facilities must be in place at the time of need, their delivery must also be carefully considered in the context of the delivery of the wider development facilitating its provision. Developments are only able to deliver education facilities where viability is taken into considerations and flexibility must therefore be afforded to ensure the provision of a new education facility would not in effect hinder or delay the delivery of the wider development. At Beckton Riverside for example, where resolution to grant was recently secured for the Phase 1 development proposals, the (draft) planning permission enables the first form of entry for the primary school requirement to be met by existing provision at a nearby school with the remaining forms required to come forward on the adjoining land owned by the GLA which will be subject to a later planning application. This approach enables the Beckton Riverside Phase 1 proposals to come forward at the earliest possibility with education provision timed appropriately.
- 1.25 Part 3(b) of the policy seeks to secure “the long-term option to deliver an education facility on specified site allocations”. St William does not support the safeguarding of land for an undefined period of time. The long term safeguarding of land in key locations where need is uncertain or not forthcoming would be contrary to the Framework⁷ and London Plan⁸ and would have a detrimental impact on placemaking over the medium to long term. Any safeguarding of land for education facilities should be evidence based and not precautionary, with clear triggers for removal of that safeguarding when appropriate.

⁵ Paragraph 100 of the Framework

⁶ Policy S3 of the London Plan

⁷ Paragraph 8 of the Framework

⁸ Policy D3 of the London Plan

- 1.26 Part 3(c) of the policy requiring flexible design to respond to an increase in pupil numbers over time is supported in principle however it must be clear that this would only be up to an agreed maximum facility size as agreed by any planning permission for the site.
- 1.27 There are a number of specific criteria outlined within part 5 of the policy which are not deemed necessary namely part (d) which is duplication to part (a); part (c) which is onerous and overly prescriptive and part (e) which requires the submission of a Transport Assessment – please refer to our response to question 1.7.
- 1.28 Part 6 of the policy is also prescriptive and not relevant to the objective of this policy which is to secure the provision of education and childcare facilities. Furthermore, biodiversity and greenspace requirements are already set out within other planning policies within the Plan.
- 1.29 St William considers that these amendments, as outlined in **Appendix 4** are important to ensure that delivery remains responsive to actual need, avoids the sterilisation of much needed land, and supports effective use of land.

Appendix 1 – Policy BFN3 Tracked Changes

BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing

1. All developments in Newham should maximise social value and to make a positive contribution to the health and wellbeing of our communities.
2. Major development, and proposals where potential health or social value issues are likely to arise, must address this as part of the Environmental Impact Assessment process and include a Social Value and Health Impact Assessment~~undertake a screening assessment as early as possible in the development process, to determine whether a Social Value and Health Impact Assessment (SV-HIA) is required.~~
- ~~3. Where the screening assessment identifies that a SV-HIA is required, then:~~
 - ~~a. the scope of the SV-HIA must be agreed with the Council's Planning and Public Health departments before it is undertaken by the applicant; and~~
 - ~~b.a. applicants will be required to prepare a proportionate SV-HIA as early as possible in the development process. This is to allow the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.~~

Appendix 2 – Policy SI2 Tracked Changes

S12: New and re-provided community facilities and health facilities

1. A sufficient supply of community facilities and health facilities will be achieved through:
 - a. the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery; and
 - b. the delivery of new health facilities on identified site allocations, subject to a needs-based assessment at the time of delivery; and
 - c. the provision of new, expanded and improved community facilities and health facilities, where it is demonstrated that there is unmet demand which will not be met by any planned delivery.
2. New facilities ~~which are either, 1,000 sqm or greater Gross Internal Area, have a user appeal beyond the local neighbourhood or are anticipated to generate a large number of trips~~ will be supported where:
 - a. there are no unacceptable transport and highway impacts; and
 - b. it can be demonstrated that the scheme has been designed to be neighbourly; ~~and~~
 - c. the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility;~~the proposed facility is located in a town or local centre;~~ or
 - d. if the facility is a main town centre use within a town centre, it can be demonstrated through undertaking:
 - i. a sequential test, that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period; and
 - ii. if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area it can be demonstrated through undertaking an impact assessment, that there are no significant adverse impacts.
3. ~~New facilities which are smaller than 1,000 sqm Gross Internal Area and have a local neighbourhood user appeal can be located outside of town or local centre where:~~
 - a. ~~the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility; and~~
 - b. ~~there are no unacceptable transport and highways impacts; and~~
 - c. ~~it can be demonstrated that the scheme has been designed to be neighbourly; and~~
 - d. ~~it is located in a:~~
 - i. ~~Neighbourhood Parade; or~~
 - ii. ~~next to a park or school; or~~
 - iii. ~~in an area of identified community facility deficit; or~~
 - iv. ~~it can be demonstrated through undertaking a sequential test, that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period; and~~
 - e. ~~if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no significant adverse impacts.~~

~~4.3. Speculative social infrastructure development will not be supported.~~

~~5.4. Re-provision (including modernisation and/or expansion) of a facility in an existing town~~

or local centre will be supported on the existing site where:

- a. here are no unacceptable transport and highways impacts; and
- b. it can be demonstrated that the scheme has been designed to be neighbourly

6.5. Re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:

- a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and
- b. there are no unacceptable transport and highways impacts; and
- c. it can be demonstrated that the scheme has been designed to be neighbourly; and
- d. if a main town centre use for a cultural use,, a sport or recreation use, or a bar or pub above 300sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no there are no significant adverse impacts.

7.6. Proposals for all new and re-provided (including modernisation and/or expansion) facilities should:

- ~~a.~~ ~~provide a Social Value Health Impact Assessment (see Local Plan Policy BFN3);~~
~~and~~
- ~~b.~~a. demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space; and
- ~~c.~~b. make efficient and effective use of land, maximising the opportunities for shared use of facilities; and
- ~~d.~~c. ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and
- ~~e.~~d. be visible and welcoming from the street and be designed to facilitate social
- ~~f.~~e. be inclusive and accessible; and
- ~~g.~~f. be designed with flexibility in mind, to allow the building to adapt to different users of the space over time; and
- ~~h.~~g. demonstrate how environmental conditions and air quality have influenced the position of the facility on the site and its design. This is especially important for facilities which are intended for children or other vulnerable users; and
- ~~i.~~h. maximise availability of their provision to the community, including during the evening and at weekends; and
- ~~j.~~i. if it is a large-scale development, and where possible for smaller-scale facilities, provide free, publicly available provision of accessible toilets, baby change, Wi-Fi and drinking water facilities; and
- ~~k.~~j. demonstrate that the scheme has been designed to be neighbourly.

8.7. Proposals for social infrastructure facilities will usually be:

- a. secured for the specific intended use of the facility; and
- b. required to enter into a Community Use Agreement with the Council.

8.

Appendix 3 – Policy SI2 Tracked Changes

SI3: Cultural facilities and sport and recreation facilities

1. Existing cultural facilities and sport and recreation facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocate unless it can be demonstrated that:
 - a. the criteria in Local Plan Policy SI1 1.a are met; or
 - b. the existing facility and any other social infrastructure use is no longer required, as demonstrated by:
 - i. an assessment that the existing use is surplus to current and future needs; and
 - ii. evidence that the facility has been actively marketed for a cultural or sport and recreation use for at least 12 months and it can be clearly shown there is no alternative social infrastructure uses that could take on the space to meet the needs of the local neighbourhood; and
 - c. the criteria in Local Plan Policy SI 1.b and SI 1.c are met.
 - d. the provision of new, expanded and improved cultural facilities and sport and recreation facilities, where it is demonstrated that there is unmet demand which will not be met by any planned delivery.
2. A sufficient supply of sport and recreation facilities will be achieved through the delivery of new or re-provided sport or recreation facilities on identified site allocations, subject to a needs-based assessment at the time of delivery.
3. New and reconfigured culture, sport and recreation facilities should meet the criteria set out in Local Plan Policy SI2.

Justification

The borough's rich cultural offer includes cultural and creative facilities which stimulate vibrancy and vitality and promote diversity. Newham's strategy [Building Newham's Creative Future \(2022\)](#) sets out an ambitious programme to promote the borough's cultural and art facilities. Its vision is for Newham to be a place where culture, creativity and heritage drive investment, inclusive participation and wellbeing.

Over the past 15 years Newham has been at the centre of some of London and the UK's largest and most ambitious cultural regeneration projects, with key developments at East Bank. Newham is home to a thriving and talented community of artists, dance groups, production agencies, musicians, community choirs, theatre companies and fashion designers. This community is essential in showcasing and nurturing Newham's cultural diversity and heritage. Artists contribute to vibrancy and the identity of a place and can encourage wider social value through open studios, public performances/exhibitions, events and festivals. Cultural facilities provide the spaces for art and culture, in all its forms, to be experienced and valued. Newham currently has few cultural spaces across its neighbourhoods¹⁸, with many not having any access to facilities such as music or dance venues, galleries or local museums.

Sports and recreation facilities are vital for promoting people's health and well-being, helping people to be active and de-stress. Priority 8 of Newham's Health and Wellbeing Strategy seeks to create an active borough. Despite a substantial free activity offer and some improvements to our sporting

¹⁸ Newham Community Neighbourhood areas, see Community Facilities Needs Assessment (2022) for further information.

infrastructure in recent years, participation in sport and recreation activities in Newham remain among the lowest in England¹⁹.

Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability. **The Regional Park's offer for Newham's communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.**

We need to ensure that residents continue to have opportunities to be physically active and healthy. On average, Newham residents have poorer health outcomes than London and England. For example, life expectancy is shorter²⁰, early death from cardiovascular disease is higher²¹, there is more mental health illness²², and children are more likely to be overweight or obese²³. Evidence suggests a link between the inactivity of residents and levels of local deprivation with the highest areas of deprivation almost 10 per cent more physically inactive than lowest deprivation areas²⁴. In addition, the perception that there is a lack of safe, green spaces as well as an ageing portfolio of sport and recreation facilities around the borough, contribute to low participation in physical activity. This creates a tipping point for poor health outcomes such as obesity and can affect mental wellbeing.

Implementation

| | |
|-------|---|
| ALL | <p>For the purpose of this policy cultural facilities are defined as:</p> <p>Theatres* (Sui Generis) Galleries* (F1(b)) Museums* F1(c) Live music, comedy and dance venues* Sui Generis</p> <p>For the purpose of this policy sport and recreation facilities are defined as:</p> <p>Sports venues/clubs, indoor sport, recreation and exercise facilities* (E(d) or F2(d))</p> <p>* Main town centre uses, as defined by the NPPF and London Plan (2021)</p> |
| SI3.1 | <p>Newham will look to protect existing cultural and sport and recreation facilities. Applicants wishing to bring forward a development which will impact an existing cultural facility should first consult Newham's Community Facilities Needs Assessment (2022), We Are Cultural (2022) and the Built Leisure Needs Assessment (2025) (2024) to understand existing provision in the borough and if the proposal site falls in an area of deficit.</p> |

¹⁹ Well Newham, 50 Steps to a Healthier Borough. Part 2: The Evidence for Action (2020).

²⁰ [Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](#)

²¹ [Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](#)

²² Adult Psychiatric Morbidity Survey

²³ [Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](#)

²⁴ Active, U. K. (2014). Turning the tide of inactivity. London: UK Active. England, S. (2017). Active lives adult survey: May 18/19 report. London: Sport England.

| | |
|-------|---|
| | <p>The implementation text for Policy SI1.1 provides guidance on demonstrating the loss of a cultural or sport or recreation facility to other uses (including a reconfiguration, reduction in size or relocation). There are a number of additional tools in place to help quantify any demand from future users created by the building of new homes and population growth for sport and recreation facilities (Built Leisure Needs Assessment (2025) (2024) and Sports Facility Calculator (Sport England).</p> <p>Sport England's Planning for Sport Guidance (2019), and subsequent updates, provides a useful guide to what understanding the need for sport and recreation facilities.</p> <p>Implementation text for Policy SI1.1 provides guidance on providing a Social- Value-Health Impact Assessment.</p> |
| SI3.2 | <p>The Local Plan neighbourhood policies and relevant site allocations set out where future sport and recreation facilities are required, reflecting the need set out in the Built Leisure Needs Assessment (2025) (2024).</p> <p>Where the need for a sport and facility has been identified on a site allocation, applicants should deliver the use in accordance with this policy unless it can be demonstrated that the needs of the community have already been met or other planning and viability considerations override its provision. Applicants need to consider what type of facility is needed and when it is required to be operational.</p> <p>Applicants should speak with the Local Planning Authority early in the development process to understand what evidence is required to support a needs-based assessment for a facility. An assessment is likely to require evidence of the following:</p> <ul style="list-style-type: none"> • an up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of of all cultural facility/sport or recreation facility locations (including town centres). Each facility location should have its 15 minute walking radius mapped (using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users). The mapping should show the network with and without the facility site. This will demonstrate the level of relevant facility coverage around the site and if the loss of a facility in this location would create a deficiency in the network, factoring in any pedestrian barriers and access challenges in the urban context. • Applicants should consult Newham's Built Leisure Needs Assessment (2025) (2024) to ascertain the current provision of sport and recreation facilities in the borough and whether or not the site is in an area of deficit. A proposals neighbourhood will depend on the type of service it is offering. • recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. |
| | <p>Applications for the enhancement of existing cultural and sport and recreation facilities and provision of new facilities will be supported, subject to meeting the criteria of Local Plan Policy SI2.</p> |

| | |
|--|---|
| | <p>Applicants wishing to bring forward a new or reconfigure cultural facility should first consult Newham’s Community Facilities Needs Assessment (2022) and Newham’s Culture Strategy, We Are Cultural (2022).</p> <p>Applicants wishing to bring forward a new or reconfigured sport or recreation facility should first consult the Built Leisure Needs Assessment (2025) (2024) to understand existing provision in the borough.</p> <p>Large-scale cultural and sport and recreation facilities will be required to support access to Newham’s emerging Culture Passport.</p> <p>The co-location of sports facilities is encouraged, particularly within new and existing schools, colleges main town centre uses such as and community centres. This will help ensure the right mix of facilities in the right places to meet sporting demand and to increase participation.</p> <p>The implementation text for Local Plan Policy SI2 provides guidance on the development of new or re-provided cultural and sport and recreation facilities (including modernisation and/or expansion).</p> <p>Local Plan Policy BFN3 provides guidance on undertaking a Social Value-Health Impact Assessment.</p> |
|--|---|

Evidence base

- [Building Newham’s Creative Future](#), Publica (2022)
- Community Facilities Needs Assessment, Publica (2022)
- Characterisation Study, Maccleanor Lavington with
- New Practice, Avis and Young, GHPA (2024) Built Leisure Facilities Needs Assessment, Strategic Leisure (2024)
- Retail and Leisure Study, Urban Shape (2022)
- [50 Steps Health and Wellbeing Strategy, Newham](#) (2024)
- [50 Steps Evidence base](#), Newham (2020)

Policy links

Local Plan:

- BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing
- HS1: Newham’s Town Centres Network
- J1: Employment and growth
- Section 4: Neighbourhoods

London Plan 2021:

- S1 Developing London’s social infrastructure
- S2 Health and social care facilities
- S5 Sports and recreation facilities
- SD7 Town Centres: development principles and Development Plan Documents

- HC5 Supporting London's culture and creative industries
- HC7 Protecting public houses

Appendix 4 – Policy SI4 Tracked Changes

SI4: Education and childcare facilities

1. A sufficient supply of childcare facilities, primary schools, secondary schools, and Special Educational Needs and Disabilities (SEND) schools to meet local need, will be achieved through:
 - a. the delivery of new schools and childcare facilities on identified site allocations, of the scale required to meet the projected need for school places;
 - b. the support for expansions of existing facilities in areas with identified need to deliver further childcare, primary, secondary and Special Education Needs and Disabilities (SEND) provision; and
 - c. the provision of new, expanded and improved education and childcare facilities, where it is demonstrated that there is unmet demand which will not be met by any planned delivery.
2. New higher education facilities will be directed to, and supported in, Newham's designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus site.
3. The appropriately timed delivery of new educational facilities to meet changing pupil place needs will be secured through:
 - a. ensuring the education facility is delivered in the appropriate phase of development;
 - b. securing the long-term option (for an agreed time period) to deliver an education facility on specified site allocations; and
 - c. requiring a flexible design so the facility can grow incrementally as pupil numbers increase up to a defined size/capacity.
4. The net loss of education facilities will only be permitted if it is demonstrated that there is no identified long-term need for the facility at that location.
5. To support the delivery of a network of well-connected neighbourhoods, new school facilities should:
 - a. be easily accessible via public transport and active travel and links to the existing network of footpath and cycle routes;
 - b. reduce the harm caused by poor air quality through the favourable location of the building(s) and associated outdoor space away from busy roads or other high pollution areas. Where this is not possible, it must be demonstrated, to the Council's satisfaction, that the provision of appropriate mitigation (such as careful layout and choice of soft landscaping) to minimise exposure to pollutants and careful layout and choice of soft landscaping;
 - c. be located on streets that can allow for temporary restrictions on motorised traffic in order to reduce exposure to air pollution and ensure pupil safety;
 - d. be located in areas linked to the existing network of footpath and cycle routes; and
 - e. submit a Transport Assessment (see Local Plan Policy T3).
6. To guarantee high-quality learning environments, new, expanded or reconfigured education facilities should:

- a. have access to outdoor greenspaces and play spaces and be ideally located within a 15 minute walking radius of a park; and
 - b. maximise biodiversity on site, including trees, gardens, and food growing spaces.
7. The design of new education facilities as well as extensions to, or reconfigurations of, existing facilities should ensure a high quality learning environment to ensure they are inclusive and accessible to all (including SEND students and those with reduced mobility needs), This will be achieved through:
 - a. meeting the relevant code of practice; and
 - b. undertaking co-production with pupils with Special Educational Needs and Disabilities, parents and teachers, especially when proposing unconventional design approaches.
8. Schools and higher education facilities should be designed and managed to meet a variety of community uses by:
 - a. providing access for community uses outside of core hours;
 - b. ensuring that the design of new education facilities is flexible in order to allow for a variety of uses within them.
9. New, expanded or reconfigured higher education facilities should deliver sufficient provision of independent learning and sport and recreation facilities to meet the needs of students and where feasible the community.
10. New tuition centres, training centres, specialist training colleges, adult learning facilities, further education facilities, and higher educational facilities will be required to provide information of the relevant certification and registration details from the Department for Education.

Planning Obligation

- Contributions may be secured from residential developments which generate additional demand for education places but where a new facility is not being delivered on site.

Justification

Local Authorities have a duty to secure early years' places (for ages 0-5), pupil places for all children of statutory school age (5-19) and provision of specialist education places for any child that requires a place (from ages 0-25) who are residents within the borough. High quality educational places to meet the needs of local residents is also crucial to reduce inequalities and deliver better opportunities for young people in the borough.

The revised pupil forecast (Places for All, London Borough of Newham (2022)) indicates that there are sufficient primary and secondary school places to meet local need up to 2027, but that there is a need for more specialist provision, in particular for pupils with complex conditions. The [Childcare Sufficiency Assessment \(LBN, \(2021\)\)](#) also states that there are currently sufficient early years' childcare spaces to meet current local need.

Nonetheless, there is likely to be an increase in demand for all school and childcare facilities over the Plan period, as forecasts indicate that by 2032, the population of 0 to 25 years will grow by 11 per cent (Places for All, London Borough of Newham (2022)). This suggests additional places will need to

be delivered in line with new housing developments in some areas of the borough to accommodate future demand, which is why some Local Plan site allocations are required to deliver education facilities and why expansions on sites in areas with identified need are encouraged.

Beyond addressing the statutory requirement of Local Authorities to provide sufficient places, this policy also speaks to the importance of educational facilities as sites that promote community cohesion and social integration. Educational facilities are vital locations for communities to meet, acting as core ‘hubs’ that foster unity, diversity, and interactions amongst local residents. Evidence shows that only twenty schools out of the 100+ schools throughout the borough had community-shared spaces (Community Facilities Needs Assessment, Publica (2022)). A more effective use of sites will be achieved by ensuring that educational facilities have a variety of community uses, and are positioned in accessible and central locations. In doing so, the policy also addresses the identified need for community spaces (Community Facilities Needs Assessment, Publica (2022)) and minimises travel distances for users.

Implementation

SI4.1

The planned delivery of childcare facilities, primary schools, secondary schools, and Special Education Needs and Disability (SEND) schools on site allocations is based on the findings from the pupil forecast (Places for All, London Borough of Newham (2022), together with the Childcare Sufficiency Assessment (London Borough of Newham (2021)). These forecasts identify where childcare facilities, primary schools, secondary schools, and SEND schools are needed based on increased levels of population resulting from residential developments and socio-economic trends.

In accordance with the Childcare Act (2006; 2016), all new primary school developments are expected to include childcare facilities, including full-time and part-time spaces. The provision of childcare facilities for ages 0-5 should be demonstrated in the proposed design of the site.

~~The site allocations that address Newham’s future need to 2038 are:~~ **Table 6: Site allocations that address Newham’s future education and childcare needs to 2042~~38~~**

| Site allocation and Neighbourhood | Ward | School Place Area | Education Facility |
|--|----------------|-------------------------------|--|
| N1.SA17 Beckton Riverside, N17 Gallions Reach | Beckton | Beckton and Royal Docks | Primary School with early years child care provision |
| N1.SA17 Beckton Riverside, N17 Gallions Reach | Beckton | Beckton and Royal Docks | Secondary School |
| N2.SA1 Silvertown Quays, N2 Royal Victoria | Royal Victoria | Beckton and Royal Docks | Primary School with early years child care provision |
| N2.SA3 Connaught Riverside, N2 Royal Victoria | Royal Victoria | Beckton and Royal Docks | Primary School with early years child care provision |
| N3.SA4 Thameside West, N2 Royal Victoria | Royal Victoria | Beckton and Royal Docks | Primary School with early years child care provision |
| N5.SA2 Custom House Coolfin North, N5 Custom House | Custom House | Canning Town and Custom House | All-through School |

| | | | | |
|-------|--|----------------|-------------------------------|----------------------------------|
| | N8.SA7 Rick Roberts Way, N8 Stratford and Maryland | Stratford | Stratford East Village | SEND School |
| | N9.SA1 Plaistow North, N9 West Ham | West Ham | Stratford West Ham | Early years child care provision |
| | N10.SA3 Newham Leisure Centre, N10 Plaistow | Plaistow South | Plaistow | Early years child care facility |
| | N11.SA3 Royal N4.SA4 Royal Road, N11 Beckton | Custom House | Canning Town and Custom House | SEND School |
| | N13.SA1 East Ham Western Gateway, N13 East Ham | East Ham | East Ham | Early years child care facility |
| | <p>For expansions of existing education facilities, vertical and horizontal expansions will be considered as long as a high-quality learning environment is maintained, including the protection of outdoor greenspace, playing fields, and play spaces, in accordance with part 5 of the policy, and there is no net loss of childcare facilities to primary and secondary facilities.</p> <p>New education facilities outside of those planned in site allocations will be considered as long as a need for them is demonstrated. Applicants will have to submit evidence of need, including the number of potential pupils and evidence that there are not sufficient education spaces to meet demand. Applicants should engage in early pre-application discussions with the Education Place Planning team.</p> <p>Local Plan Policy J4.2 requires delivery of childcare facilities where there is a need.</p> <p>Contributions may be sought, for school places on residential developments which generate additional demand for school places but where a new school is not being delivered. Contributions will be sought in line with Local Plan Policy BFN4 and Places for All (2022).</p> | | | |
| SI4.2 | <p>Development which will enhance higher education and skills provision in Newham will be supported either on existing campus developments within the borough or in town centre locations.</p> <p>Applicants will need to provide evidence of having secured the higher education establishment that will be using the proposed facility, as well as details of student and staff numbers, enrolment criteria, and curriculum details.</p> <p>Local Plan Policy H8 sets out the requirement for applications for purpose built student accommodation.</p> | | | |
| SI4.3 | <p>The Places for All document (London Borough of Newham (2022)) and the annual Childcare Sufficiency Assessment (London Borough of Newham) will likely reflect an increase in demand in their future revisions. As such, the delivery of new educational facilities should be flexible in terms of both timescale and design to meet fluctuating pupil place needs.</p> | | | |

| | |
|-------|--|
| | <p>The phasing of education facilities should take place in a timely and coherent manner, delivering the facility at an appropriate phase based on anticipated pupil demand as per the revised pupil forecast.</p> <p>Additionally, the delivery of new education facilities on identified site allocations should provide a long-term option, up to 2038, to bring forward the facility, to allow for changes in the pupil place planning profile. Where the school will only be needed in the latter part of the Plan period then appropriate meanwhile uses should be determined for the site. Such uses should be defined in the scheme's Meanwhile Use Strategy and in accordance with BFN1.</p> <p>In terms of design, new proposals for educational facilities should have regard to the design standards of the Area Guidelines for Mainstream Schools (Department for Education (2014)) and Active Design (Sport England ((2015))), as well as incorporate a flexible design to allow for future expansions as pupil place needs fluctuate. Design and Access Statements should demonstrate how the design of the facility can incorporate future expansions that maintain the high-quality learning environment as outlined in SI5.5 and retain outdoor greenspaces.</p> |
| SI4.4 | <p>Forecasts demonstrate that the young population of Newham will grow throughout the Plan period (Places for All, London Borough of Newham (2022) and Childcare Sufficiency Assessment, London Borough of Newham (2021)). As such, all childcare and educational facilities should be protected unless the revised Pupil Place Planning Report, or equivalent corporate strategy, suggests there is no long-term need for such facility.</p> |
| SI4.5 | <p>In Education sites should be directly linked to an active travel network, and should be designed to hold sufficient cycle and scooter parking for all pupils, as well as appropriate facilities to promote active travel, such as showers, changing rooms, and lockers.</p> <p>Additionally, facilities should reduce exposure to air pollution and improve safety by not being located close to pollution sources, such as beside roads or in areas where vehicles idle. Air quality should be considered at the earliest stages of planning and design, before the position of infrastructure and buildings is decided. A site-specific air quality appraisal should form part of any application that includes an education or childcare facility. Understanding the air quality constraints of a site as early as possible can benefit the design of a development. The GLA guidance, Using Green Infrastructure to Protect People from Air Pollution (2019), provides best practice on how green infrastructure can reduce exposure to air pollution in an urban environment. Consultation with Newham's Environmental Health Officers is essential.</p> <p>All of the above shall be demonstrated in the submission of a travel plan. The travel plan should follow the specific guidance for education facilities listed in the Travel Plan Guidance (London (2022)). The travel plan should also demonstrate how impacts on road congestion, specifically in cases where the site is located within a residential area, will be addressed. See Local Plan Policy T3 for further travel plan guidance.</p> <p>Developments for schools and childcare facilities only need to fulfil the requirements of Local Plan Policy SI4 as opposed to all SI policies.</p> |
| SI4.6 | <p>In addition to following building regulations for childcare, schools, and further education facilities as per BB103 Area Guidelines for Mainstream Schools (Department for</p> |

| | |
|-------|--|
| | <p>Education (2014)), new educational facilities should be designed to deliver the following requirements:</p> <ul style="list-style-type: none"> • layout: new education facilities should provide outdoor greenspace at ground-floor level (including play spaces, allotments, gardens, trees, sheltered outdoor spaces, and food growing spaces) in line with Sport England's Design and cost guidance. • facilities need to be sufficiently large to accommodate the maximum number of pupils. • facilities should also ideally be located within a 15 minute walking radius of an existing green space (2ha or more). Green space in proximity to an education facility should not replace the requirement for greenspace on-site. |
| SI4.7 | <p>All new educational facilities, together with extensions to existing educational facilities, should comply with the design standards of Special Educational Needs and Disability Code of Practice: 0 to 25 Years (Department for Education and Department of Health (2015)) to make sure that educational facilities are fully inclusive and adapted to meet all student needs.</p> <p>Applications should demonstrate the implementation of Special Educational Needs and Disabilities related design standards, and should also demonstrate evidence of co-production with parents, pupils, and teachers, to reach design decisions. This is particularly essential for unconventional and innovative design approaches. All educational facilities should still follow the relevant building guidance, but variation in design will be supported when required by site constraints and the final design still creates a high quality learning environment and meets the requirements of Newham's Education team. Variations to the design of SEND schools are less likely to be supported, due to the specific needs of their pupils.</p> |
| SI4.8 | <p>New education facilities need to provide access for community uses outside of core hours, which include before and after school hours weekends and school holidays.</p> <p>Education facilities should seek to enable as much of the school as feasible to be made available for local community groups and the council. This includes all spaces within educational facilities, including classrooms, halls, gyms, outdoor spaces, and canteens. Where aspects of the facility is excluded from community use, evidence must be provided as to why this is not feasible. All design considerations must be explored to seek to maximise wider community use.</p> <p>In order to guarantee access to the community, a Community Use Agreement will be secured that will prioritise community uses at affordable rates. Community Use Agreements are likely to include, but are not restricted to:</p> <ul style="list-style-type: none"> • hours of operation, • rent thresholds, • management of the space, • what uses it can allow, • how it will be advertised. <p>The layout of new education facilities should be sufficiently flexible to adapt to different community uses. The flexibility of the proposed space should be demonstrated in the Design and Access Statement.</p> |

| | |
|--------|---|
| | <p>‘Use Our School’ is a free online Sport England resource that offers further guidance and information on how to make best use of facilities for the benefit of the local community. It is especially useful for those who have responsibility for establishing, sustaining and growing community activity on school sites.</p> |
| SI4.9 | <p>Higher education providers need to deliver sufficient access to necessary student facilities to ensure that the student body does not overburden limited spaces in public facilities. Sufficient provision of independent learning and sport and recreation facilities should meet the needs of the maximum number of potential future students. Student facilities include studying spaces, sports, culture and sport and recreation facilities and classrooms.</p> <p>The design of higher education facilities should follow the requirements in SI4.5, SI4.6, and SI4.7, and the flexibility to allow for future expansion and protection of the facility should follow the requirements in clauses SI4.2 and SI4.4.</p> |
| SI4.10 | <p>Tuition centres, training centres, adult, and further and higher educational facilities provide additional and lifelong learning and there is need for such uses for residents of all ages to gain more skills and qualifications.</p> <p>Applicants will need to provide evidence of the relevant Ofsted registration from the Department for Education as well as details of student and staff numbers, enrolment criteria, and curriculum details.</p> |

Evidence base links

- Childcare Act (2006)
- Childcare Act (2016)
- Places for All, London Borough of Newham (2022)
- Childcare Sufficiency Assessment, London Borough of Newham (2021)
- Securing Developer Contributions for Education, Department for Education (2019)
- BB103 Area Guidelines for Mainstream Schools, Department for Education (2014)
- Community Facilities Needs Assessment, Publica (2022)
- Infrastructure Delivery Plan, London Borough of Newham (2022)
- Travel Plan Guidance, London Borough of Newham (2022)
- Special Educational Needs and Disability Code of Practice: 0 to 25 Years, Department for Education and Department of Health (2015)
- Planning for Sport Guidance, Sport England (2019)
- [Design and cost guidance, Sport England](#)
- Active Design, Sport England (2015)

Policy links

Local Plan:

- GWS1: Green spaces
- GWS2: Water spaces
- GWS5: Play and informal recreation for all ages
- CE1: Environmental design and delivery
- T3: Transport behaviour change
- H8: Purpose built student accommodation

- Section 4: Neighbourhoods

London Plan 2021:

- S3 Education and childcare facilities