

**LONDON BOROUGH OF NEWHAM**

**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC  
WRITTEN STATEMENT**

**MAIN MATTER 12:  
GREEN AND WATER SPACES**

**WE ARE NEWHAM.**

**Note:** Where modifications are proposed as part of the responses below, text to be removed is set out in ~~strike through~~ font and new text is set out in **bold** font.

## **GWS1 Green spaces**

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

- a) Is the designation of each green space included on the policies map justified?
- b) Are the areas of Green Belt designated on the policies map consistent with the London Plan?
- c) Are the areas of Metropolitan Open Land designated on the policies map consistent with the London Plan?
- 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?
- e) Is the reference in part 3 to development on green space only being supported in exceptional circumstances justified?
- f) Are the requirements in part 5 relating to future maintenance of new green space justified?

### **Council Response:**

- 1.1 The Council considers that Policy GWS1 is justified, consistent with national policy and in general conformity with the London Plan (2021). It reflects Newham's local context and is supported by a range of duty to cooperate partners, including Sport England, Natural England and the Environment Agency.
- 1.2 In accordance with paragraph 102. of the National Planning Policy Framework (NPPF, 2023) and policies G1 and G4 of the London Plan (2021), Policy GWS1 is underpinned by robust and up-to-date assessments of the need for open space, green infrastructure, and sport and recreation facilities. Key evidence includes:
- Green and Water Infrastructure Strategy (GWIS) (2025) [EB061–EB067]
  - Sites of Importance for Nature Conservation (SINC) Review (2025) [EB070]
  - Metropolitan Land Review (2025) [EB069]
  - Playing Pitch Strategy (2025) [EB046]
  - Characterisation Study (2024) [EB008–EB022]
- 1.3 The objective of Policy GWS1 is to ensure the Local Plan is positively prepared by protecting, enhancing, and delivering a network of accessible green spaces to meet the needs of Newham's growing population. Specifically, the policy:
- Plans positively for the provision and protection of green space, preventing the loss of valued assets (NPPF paras 97 and 102; London Plan Policies G1, G4, G6, G8)
  - Enhances functionality, connectivity, quality and accessibility of existing green spaces and playing fields (NPPF paras 96(c) and 103; London Plan Policy G4)
  - Requires development to maximise green space and urban greening, supporting health, wellbeing, biodiversity and climate resilience, including Biodiversity Net Gain (NPPF paras 96 and 102; London Plan Policies G4, G5, G6)
  - Safeguards Metropolitan Open Land and Green Belt, maintaining their open character in line with national and London Plan policy (London Plan Policies G2 and G3; NPPF Chapter 13 and para 181)

- Responds to future demand for green space and playing fields (NPPF para 102; London Plan Policies G4 and G8)
- Considers long-term management, ensuring new green spaces are maintained and meet local needs (London Plan Policies G1 and G4)

1.4 The GWIS (2025) identifies that Newham has a low provision of publicly accessible green space—0.72 hectares per 1,000 residents, significantly below neighbouring boroughs. There are also shortfalls in play space and areas for community and food growing.

1.5 With a projected 25% population increase over the Plan period, green space provision will fall to 0.57 hectares per 1,000 residents if no new sites are delivered. To maintain current standards, 68 hectares of additional publicly accessible green space will be required.

1.6 Given this context, it is essential to both protect existing green spaces and deliver new provision, while also greening the urban environment wherever possible. Sensitive enhancement of existing spaces will be equally important.

1.7 Newham currently provides 17.1 hectares of allotments and community growing spaces across 11 sites, equating to 0.05 hectares per 1,000 residents, well below the National Allotment Society's recommended standard of 0.125 hectares per 1,000 residents. These spaces offer health, environmental and social benefits, and contribute to climate resilience through reduced food miles and increased biodiversity.

1.8 Playing fields and pitches are vital for healthy communities. The Playing Pitch Strategy (2025) identifies shortfalls in provision for football, cricket, rugby union and tennis. While current shortfalls can be addressed through better utilisation of existing facilities, all existing provision must be protected until future demand is met and spare capacity is clearly demonstrated. Replacement of any lost provision must be of equal or better quantity and quality. Sport England has confirmed support for the policy and its evidence base (Reg19-C-023/007).



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

1.9 The Council considers the green space designations on the policies map to be justified, consistent with national policy and in conformity with the London Plan, with the proposed modifications outlined below.

1.10 The designations are supported by a robust and up-to-date local evidence base, primarily the Green and Water Infrastructure Strategy (GWIS), Newham (2025) [EB061–EB067]. The GWIS draws on comprehensive data sources to assess the extent, typology, and condition of green and water spaces across the borough.

1.11 The GWIS draws on comprehensive data sources to assess the extent, typology, and condition of green and water spaces across the borough. A key data source was Greenspace Information for Greater London (GiGL), which provides borough-wide mapping of green and water spaces, categorised according to London Plan typologies. This baseline was verified through a detailed desktop review, followed by site surveys conducted in summer 2022 to assess the physical condition and boundaries of green infrastructure assets.

- 1.12 The GWIS identifies a total of 916 hectares of green and water infrastructure in Newham, including 332.87 hectares of water infrastructure (rivers, docks, and watercourses). The mapped typologies include:
- Parks
  - Amenity green spaces
  - Natural and semi-natural green space
  - Water spaces infrastructure
  - Green corridors
  - Sports fields
  - Play space
  - Growing space (including allotments)
  - Cemeteries and churchyards
- 1.13 The Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004) includes refinements to the green space designations on the policies map (p109 -p117), ensuring alignment with the typologies established in the GWIS and correcting mapping anomalies.
- 1.14 Five proposed modifications (MO122–MO125, MO106.2) remove green space designations from private educational grounds, which are not publicly accessible and therefore do not contribute to the borough's open space provision
- 1.15 Four modifications (MO126–MO129) remove designations from community growing spaces that are in meanwhile use and not permanent allotments and therefore do not meet the criteria for long-term designation.
- 1.16 Modification MO130 removes a proposed 'community growing space' designation from the West Ham Nursery site, while MO132 corrects the designation at N8.SA8 Bridgewater Road, reclassifying Puddling Mill Allotment as a 'community growing space' rather than part of the wider Queen Elizabeth Olympic Park. MO133 corrects the designation at N13.SA3 Former East Ham Gasworks, identifying the area as Previously Developed Land (PDL) rather than green space.
- 1.17 An additional mapping anomaly has been identified post-submission, at Marlin Apartments, Stratford (E15 1PE), which was incorrectly designated as green space. The Council proposes a modification to remove this designation to ensure accuracy and consistency with the evidence base. This amendment does not influence the overall provision or provision calculations within the GWIS (2025).

Site allocation / location	Change proposed and reasoning	Draft Submission Local Plan (Regulation 19) mapping [not to scale]	Submission Local Plan proposed mapping [not to scale]
2 Millstone Close, Windmill Ln, London E15 1PE	Correct green space to remove designation on the Marlin Apartment buildings (0.3Ha)		

**b) Are the areas of Green Belt designated on the policies map consistent with the London Plan?**

1.18 Yes, the areas of Green Belt designated on the policies map are consistent with the London Plan (2021), specifically Policy G2, which seeks to protect the openness and permanence of London's Green Belt. The designated areas reflect existing Green Belt boundaries, and no new Green Belt land is proposed. The Council has not proposed any alterations to the extent of the Green Belt in Newham, and the designations are consistent with both strategic policy and national guidance set out in Chapter 13 of the NPPF (2023).

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

1.19 The Council considers that its approach to Metropolitan Open Land (MOL), as set out on the policies map, is justified and consistent with Policy G3 of the London Plan (2021). The MOL designations are supported by a robust and up-to-date evidence base, specifically the Metropolitan Open Land Review (2025) [EB068].

1.20 The MOL Review assessed all existing and potential MOL sites against the London Plan's MOL criteria. It concluded that the majority of existing MOL sites in Newham perform moderately to strongly against these criteria and should be retained. The Review recommended the following changes:

- Retention with boundary amendments to strengthen defensible boundaries at:
  - A20: Langdon Academy
  - A21: East Ham Sports Ground
  - A32: Olympic II Park, Lee Valley
- Release of MOL at:
  - A39: Alfreds Way Open Space (part), which performs weakly against three MOL criteria (A–C) and lacks public accessibility.

1.21 The Review also considered four additional green space parcels identified through the Green and Water Infrastructure Strategy (GWIS) as being potentially strategically important. These were assessed against the London Plan MOL criteria.

1.22 The recommendations for these additional parcels were:

- Designation as MOL for:
  - A33: West Ham Park
  - A34: Thames Barrier

- A35: Water Works River
- A small parcel east of City Mill River, proposed as an extension to the existing A32: Olympic Park Lee Valley MOL designation.

1.23 The policies map reflects the recommendations of the MOL Review. As such, the proposed MOL designations and boundary amendments are consistent with the London Plan (2021), and have been prepared in accordance with Policy G3, clause C, which allows for boundary changes through the Local Plan process.

1.24 After Regulation 19, the Council considered an amendment to the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we considered that this wider parcel met the definition of MOL in the London Plan. However, on receiving further legal advice, it was considered that the change to the proposed MOL boundary could not be made at this point in the plan making process. The Council is proposing to remove the proposed 'community growing space' designation from the West Ham Nursery site, this is set out in in the Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004, modification: MO130).

1.25 It should be noted that the following representation responses incorrectly refer to the proposed extension to MOL parcel A33 (SD026):

- |                       |                  |
|-----------------------|------------------|
| • Community Group Rep | Reg19-C-008/001a |
| • CPRE                | Reg19-E-014/010  |
| • City of London      | Reg19-E-177/010  |
|                       | Reg19-E-177/011  |
|                       | Reg19-E-177/013  |
|                       | Reg19-E-177/015  |
|                       | Reg19-E-177/017  |
|                       | Reg19-E-177/032  |
| • One Newham          | Reg19-E-244/049  |

1.26 The correct consultation response is provided in the summary of responses in Appendix 2 of the Regulation 22 Statement (SD017, p 240 -241).

1.27 The Council has engaged with the Mayor of London and adjoining boroughs through the Duty to Cooperate process. The Duty to Cooperate Statement Addendum (2025) [SD052] confirms that neighbouring boroughs raised no objections to the methodology or outcomes of the MOL Review. The GLA also raised no concerns in their Regulation 19 response. The Council therefore considers that the requirements of London Plan Policy G3 have been met.

**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?**

1.28 The Council considers that Policy GWS1 takes a justified and clear approach to the protection of green space in Newham. Paragraph 103 of the NPPF (2023) states that existing open space, including playing fields, should not be built on unless there is clear evidence of surplus. To ensure clarity, the Council proposes the following modification to Part 1 of GWS1(a):

- a. Protecting **all** existing green space to ensure there is no net loss, except where it meets the criteria set out in Part 3 below; and...

1.29 The GWIS demonstrates that Newham has a significant deficiency in green space, which is projected to worsen over the Plan period due to population growth. It is appropriate to protect all existing green space and to ensure that there is no net loss.

1.30 The GWIS did not include the following open space typologies in the overall total of green space calculations:

- Civic grey spaces
- Urban fringe
- Housing green space / sites left over after planning
- Green roofs
- Private gardens
- Education greenspace
- Meanwhile community growing space

1.31 While these spaces are not designated on the policies map, Policy GWS1 applies to all existing green space, including unmapped areas. This approach is consistent with Newham's adopted Local Plan and is clarified in the supporting implementation text for Policy GWS1.

1.32 This approach is also consistent with that taken by neighbouring boroughs with similar urban contexts. For example, the London Borough of Tower Hamlets applies a similar policy through Policy S.OWS1 of its adopted Local Plan (2020), which protects all green space regardless of designation. Tower Hamlets has 0.89 hectares of publicly accessible green space per 1,000 residents, while Newham has just 0.72 hectares per 1,000 residents. Given Newham's lower provision and the evidence of need, the Council considers its approach to be both justified and unambiguous.

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

1.33 The Council considers that the reference to "exceptional circumstances" in Part 3 of Policy GWS1 is justified, consistent with national policy and in conformity with the London Plan (2021). This provision introduces appropriate flexibility to allow for development that enhances the functionality, accessibility, or quality of existing green space, where it delivers clear benefits to the community and environment.

1.34 This approach is underpinned by the Green and Water Infrastructure Strategy (GWIS). Principle 6: 'Maximise Potential – Make Places Multi-functional' (GWIS, para. 6.25) highlights the need for green and water spaces in Newham to deliver multiple benefits—ranging from recreation and health to climate resilience and biodiversity connectivity.

1.35 Both the NPPF (para. 102) and the London Plan (Policy G1) recognise the multifunctional role of green space, including:

- Supporting mental and physical health
- Enhancing climate resilience (e.g. carbon sequestration, urban cooling)
- Improving air and water quality
- Promoting biodiversity
- Encouraging active travel
- Supporting food growing and environmental education
- Contributing to landscape and heritage value

1.36 Part 3 of Policy GWS1 sets out a clear list of ‘exceptional circumstances’ under which development on green space may be considered acceptable. These circumstances are designed to ensure that any development delivers a net benefit to residents and improves the overall quality and use of green space.

1.37 This approach aligns with paragraph 103. of the NPPF, which permits development on open space only where:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

1.38 The criteria in Part 3 of GWS1 directly reflect these national policy tests:

- Part 3.a aligns with NPPF 103(a), requiring that development does not increase green space deficiency
- Part 3.b aligns with NPPF 103(b), requiring replacement provision of equal or better quality
- Part 3.d aligns with NPPF 103(c), supporting alternative recreational uses where benefits outweigh the loss

1.39 It is important to note that Part 1.b of Policy GWS1 separately addresses Metropolitan Open Land and Green Belt, which are subject to stricter protections under London Plan Policies G2 and G3 and national Green Belt policy (NPPF Chapter 13), where development is only permitted in ‘very special circumstances’.

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

1.40 The Council considers that Part 5 of Policy GWS1 is justified. The long-term funding and management of green spaces is essential to ensure they remain safe, inclusive, and responsive to local needs. Whether publicly or privately owned, green spaces should be welcoming to all and provide amenities—particularly for sport, play, and social interaction—that reflect the needs of Newham’s diverse communities.

1.41 In line with the Good Growth objectives of the London Plan, particularly GG1: Building strong and inclusive communities, public spaces must be accessible and inclusive for all Londoners—regardless of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation. The way public space is managed directly affects how it is used, perceived, and valued by residents.

1.42 Part 5 of GWS1 sets out the expectation that new green space—particularly where it functions as a Local Park or forms part of a site allocation—should be transferred into Council ownership, with a commuted sum secured via legal agreement to cover maintenance costs for a period of 15 years.

1.43 The policy is also suitably flexible. Where transfer to Council ownership is not feasible, it allows for an alternative approach: the submission of a Management Plan that



demonstrates how the principles of the Public London Charter (2021) will be met and secured.

- 1.44 The Public London Charter, adopted as London Plan Guidance, supports the implementation of Policy D8 and sets out principles for public space that is:
- Safe, inclusive, and accessible
  - Well-maintained and serviced
  - Open and welcoming to all, regardless of ownership
  - Designed to encourage public use and community benefit
- 1.45 This policy approach is further supported by the GWIS, particularly Principle 9: Active Management – Consistent and Sustainable Management Models, which highlights the need for consistent and inclusive approaches to managing green space. It also supports the goal of ensuring all residents can access a range of green spaces within 15 minutes of their home.
- 1.46 Finally, London Plan (2021) Policy G4 reinforces the importance of ensuring that green space delivered through development remains publicly accessible and well-managed, further justifying the requirements set out in Part 5 of Policy GWS1.

## **GWS2 Water spaces**

Q12.2 Is policy GWS2 justified and consistent with national policy and the London Plan? In particular, the requirement in part 2 for development affecting and/or adjacent to water space to improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value

### **Council Response:**

- 2.1 The Council considers that Policy GWS2 is justified, consistent with national policy, the London Plan (2021) and appropriately reflects Newham's local context. The policy is broadly supported by duty to cooperate partners, including Sport England, Natural England, and the Environment Agency.
- 2.2 In accordance with para.102 of the NPPF (2023) and Policy SI 14 of the London Plan (2021), the requirements of Policy GWS2 are supported by robust and up-to-date evidence, including:
- Green and Water Infrastructure Strategy (GWIS) (2025) [EB061–EB067]
  - Sites of Importance for Nature Conservation (SINC) Review (2025) [EB070]
  - Metropolitan Land Review, Newham (2025) [EB069]
  - Characterisation Study (2024) [EB008–EB022]
- 2.3 Newham's water infrastructure includes the River Thames, its major tributaries (Lea and Roding), and a significant area of repurposed dock infrastructure, which is central to the borough's regeneration strategy.
- 2.4 These waterways provide vital ecological functions, including habitat provision, biodiversity corridors, and climate mitigation (e.g. urban cooling). They also contribute to Newham's identity and offer unique visual and heritage value.

2.5 Water spaces also support leisure and recreation, offering opportunities for both active and passive use. Access to water infrastructure enhances physical and mental wellbeing and provides relief from the borough's dense urban environment.

2.6 Enhancing walking and cycling connections along the Lea, Roding, Thames, and Royal Docks would significantly improve access to nature and biodiversity, supporting inclusive and healthy neighbourhoods.

2.7 It is therefore essential to protect and enhance Newham's water spaces, improving public access, biodiversity, water quality, and design quality, while celebrating their industrial and cultural heritage.

2.8 The objective of Policy GWS2 is to ensure the Local Plan is positively prepared by delivering a connected, accessible, and multifunctional water space network. Specifically, the policy:

- Plans positively for the protection and enhancement of waterway infrastructure (NPPF paras 102, 103, 180; London Plan Policies SI14, SI16, SI17)
- Enhances functionality, connectivity, quality, accessibility, and appropriate use of water spaces (NPPF para 180; London Plan Policies SI14, SI16, SI17)

2.9 The Council considers Part 2 of Policy GWS2 to be justified and consistent with national and London Plan policy, subject to proposed modifications.

2.10 Part 2 seeks to balance the natural value of waterways with opportunities for public enjoyment. It aligns with London Plan Policies SI16 and SI17, which encourage the use of the Blue Ribbon Network for transport, leisure, and informal recreation. Supporting text in the London Plan (paras 19.16.1 and 19.17.2) emphasises:

- The importance of water-based and waterside uses
- The need to avoid encroachment into waterways
- The value of ancillary uses that support public access and vibrancy
- The protection of navigation, hydrology, biodiversity, and character

2.11 The Environment Agency, in its Regulation 19 representation, raised concerns that Part 2 could allow water-dependent uses to encroach into rivers, potentially increasing flood risk and reducing biodiversity (Reg19-E-238/028).

2.12 In response, the Council has engaged positively with the Environment Agency through the Duty to Cooperate and proposes modifications to Part 2 and its implementation text. These are set out in the Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004) and the Statement of Common Ground (SD054) with the Environment Agency, which confirms the Environment Agency's support for the revised approach.

Reference	Modification proposed	Page number in <a href="#">Regulation 22 Local Plan</a>	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO75.1	<p>New text in <b>bold</b> and removed text in <del>strike through</del>.</p> <p>Footnotes and hyperlink changes expressed between [ ] brackets</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including <b>undeveloped areas of riparian buffer zone</b>, riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through: [...] <b>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</b></p> <p><del>de.</del> requiring no <b>encroachment</b> <del>loss</del> or covering of any water space unless it is a water-related or water dependent use. <b>Development proposals to impound or narrow water spaces will not be supported;</b> and</p>	297	GWS2 part 2
MO75.4	<p><del>Less</del> <b>Encroachment and covering</b></p> <ul style="list-style-type: none"> <li>• Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in <b>the encroachment</b> <del>loss</del> or covering of water space <b>unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft.</b></li> </ul> <p><b>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible.</b> <del>and demonstrate that it will not compromise the suitability of the water space for water-related uses.</del> [...]</p> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Schemes should maximise opportunities to incorporate existing habitats and vegetation.</li> </ul>	300	GWS2.2 Implementation text

	<ul style="list-style-type: none"> <li>• <b>Ensure watercourse Biodiversity Net Gain units are considered if a proposed development is within 10m of a watercourse. See Local Plan Policy GWS3 for further detail on delivering Biodiversity Net Gain.</b></li> <li>• Planting should include...</li> </ul>		
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2.13 Several Regulation 19 representations requested greater clarity and flexibility in relation to Part 2 of Policy GWS2, particularly regarding water-related activation and water-dependent uses. These included:

- Royal Docks Team (Reg19-E-178)
- Royal Docks Management Authority (Reg19-E-061)
- Good Hotel (Reg19-E-214)
- ExCel and Mount Anvil (Reg19-E-183)

2.14 These stakeholders emphasised the need for clearer guidance on what constitutes appropriate water-related development, particularly in regeneration areas such as the Royal Docks.

2.15 Conversely, the Lee Valley Regional Park Authority (Reg19-E-171/12a–c) and Sport England (Reg19-C-023/008) submitted representations in support of Policy GWS2, endorsing its balanced approach to activating water spaces while safeguarding biodiversity, accessibility, and public benefit.

2.16 The Council recognises the importance of ensuring that Policy GWS2 provides clear guidance on what constitutes appropriate water-related or water-dependent development. In response to stakeholder feedback and in order to ensure consistency with London Plan Policy SI17, the Council proposes the following modification to Implementation Point GWS2.3, as set out in the Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004).

Reference	Modification proposed	Page number in <a href="#">Regulation 22 Local Plan</a>	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO77	<p>New text in <b>bold</b> and removed text in <del>striketrough</del>.</p> <p>Footnotes and hyperlink changes expressed between [ ] brackets</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024<del>5</del>) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. <b>Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</b></p>	302	GWS2.3 Implementation text

## **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?
- 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.
- c) The requirements in part 4 relating to biodiversity net gain.
- 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?

### **Council Response:**

3.1 The Council considers that Policy GWS3 is justified, consistent with national policy, the London Plan (2021), and relevant legislation. The policy reflects Newham's local ecological context and is supported by Natural England, subject to proposed modifications to Part 7 and its implementation guidance.

3.2 In accordance with paragraphs 181 and 185 of the NPPF (2023) and London Plan Policies G1 and G6, Policy GWS3 is underpinned by robust and up-to-date evidence, including:

- Sites of Importance for Nature Conservation Review (2025) [EB070]
- Epping Forest SAC Recreation Mitigation Strategy (2025) [EB071]
- Green and Water Infrastructure Strategy (GWIS) (2025) [EB061–EB067]
- Metropolitan Land Review (2025) [EB069]
- Characterisation Study (2024) [EB008–EB022]

3.3 Epping Forest, located just outside Newham, is the largest green space in London and a designated Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Rising visitor numbers have led to ecological pressures. Newham has worked collaboratively with the City of London and neighbouring authorities to develop a joint governance and delivery framework for the Strategic Access Management and Monitoring Strategy (SAMMS).

3.4 The objective of Policy GWS3 is to ensure the Local Plan is positively prepared by requiring development to contribute to nature recovery in Newham through the protection and enhancement of biodiversity across both green and water spaces. Specifically, the policy:

- Plans positively for the protection and enhancement of habitats and biodiversity features (NPPF paras 180, 185, 186; London Plan Policy G6)
- Maximises opportunities for on-site habitat creation and ecological connectivity (NPPF para 180; London Plan Policies G1, G5, G6)
- Takes a strategic approach to protecting SINCs and reducing access to nature deficiencies (NPPF paras 181, 185; London Plan Policies G1, G6)
- Requires delivery of Biodiversity Net Gain (BNG) of at least 10% (NPPF paras 180, 185, 186; Environment Act 2021)

- Protects and enhances the Epping Forest SAC, in line with the Habitats Regulations and NPPF para 187

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

3.5 The Council considers that the Sites of Importance for Nature Conservation (SINC) designations shown on the policies map are justified, consistent with national policy and in conformity with the London Plan (2021), subject to the proposed modifications outlined below.

3.6 The designations are supported by a robust and up-to-date evidence base, specifically the Sites of Importance for Nature Conservation Review (2025) [EB070], undertaken by the London Wildlife Trust on behalf of the Council. The review was completed in 2022 and formed part of the published evidence base for the Regulation 18 and Regulation 19 consultations of the borough's draft Local Plan.

3.7 During consultation, minor mapping errors and requests for greater clarity—particularly regarding The Greenway SINC—were identified. These have been addressed in the 2025 report, which includes:

- Correction of the boundary for SINC NeB10: The Royal Docks (see MO121 in the Schedule of Proposed Modifications [SD004])
- Larger scale maps for SINC NeB16: The Greenway
- Additional detail on the rationale for extensions to SINC NeB16

3.8 In line with best practice, London boroughs are encouraged to submit their SINC reviews to the London Wildlife Sites Board<sup>1</sup> (LWSB)—an expert group chaired by the Greater London Authority (GLA)—for independent scrutiny. The LWSB ensures that reviews are undertaken in accordance with national and regional guidance for identifying Local Wildlife Sites.

3.9 Newham's SINC Review was considered by the LWSB in September 2023, which confirmed that the review was conducted in accordance with relevant guidance and best practice.

3.10 Following duty to cooperate discussions with Thames Water, the Council proposes to amend SINC NeB18 to align with the Landscape Ecological Management Plan (LEMP) associated with planning application 19/02768/FUL, and to reflect the designation of Strategic Industrial Land (SIL) by removing SIL land from the proposed SINC parcel. This is detailed in the Statement of Common Ground with Thames Water (SD069).

3.11 It should be noted that Thames Water maintains its objection to the designation of SINC NeB18, even with the proposed amendment, and objects to the designation of SINC NeB15: Beckton Sewage Treatment Works North.

**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.**

3.12 The Council considers that Part 3 of Policy GWS3 is justified and consistent with Policy G6 of the London Plan (2021). Specifically, Part B2 of Policy G6 states that

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<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/biodiversity>

boroughs should identify areas of deficiency in access to nature—defined as locations more than 1km walking distance from an accessible Metropolitan or Borough SINC—and seek opportunities to address these deficiencies through the development plan process.

- 3.13 The GWIS has established that there are areas of Newham that are deficient in access to nature. Figure 5.5 (p.62) of the GWIS [EB063] illustrates that all wards except Little Ilford, Forest Gate South, West Ham, Plaistow South, and East Ham South are under-provided. Reflecting this analysis, Priority 3 of the GWIS: Improving Ecology and Biodiversity, highlights that while Newham has a number of SINCs, the most ecologically valuable areas lie at the borough's edges, with central areas lacking biodiversity. The strategy recommends that new external spaces should be managed to deliver better biodiversity outcomes.
- 3.14 Accordingly, Part 3 of Policy GWS3 seeks to address this spatial imbalance by encouraging the delivery of new or improved green or water spaces that could qualify as SINCs in areas deficient in access to nature. The policy uses the term 'should', signalling the Council's ambition to meet the identified need for natural spaces. Where it is not possible to deliver new SINC-quality spaces, the policy provides flexibility by allowing alternative enhancements to improve access to nature, as set out in clauses 3(a), 3(b), and 3(c).
- 3.15 This approach reflects Principle 4 of the GWIS: Re-define 'Environment' – Every Square Metre Counts, which advocates for a shift in thinking: rather than limiting access to nature to designated sites, the borough should seek opportunities to embed nature throughout Newham's urban environment.
- 3.16 The implementation guidance accompanying Policy GWS3 further clarifies how Part 3 should be applied in practice. The Council considers this to be a locally justified and balanced approach, which aligns with the strategic objectives of London Plan Policy G6 and responds directly to the borough's evidence base.

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

- 3.17 The Council considers part 4 of Policy GWS3 is justified, consistent with national policy, specifically paragraphs 180., 185. and 186 of the NPPF (2023) and in conformity with the Environment Act 2021, which mandates a minimum 10% Biodiversity Net Gain (BNG) for most developments. The policy also aligns with London Plan Policy G6 and the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (2021).
- 3.18 Through the Duty to Cooperate, both Natural England and the Environment Agency have confirmed their support for this policy, as set out in the Council's Duty to Cooperate Statements (Natural England: [SD056]; Environment Agency: [SD054]).
- 3.19 In its Regulation 19 response (Reg19-E-166/002), Natural England stated:

*"Natural England are supportive of this policy which outlines that new development in Newham should contribute towards nature recovery in Newham. Natural England support Newham's commitment to new development proposals providing a minimum of 10% biodiversity net gain across the borough and that this should be secured for a minimum of 30 years. We welcome the commitment to the delivery of on-site net gain provision before delivery off-site, in line with the Biodiversity Gain Hierarchy. On-site provision can help to provide biodiversity gains close to where a loss may have taken place or is proposed and can increase access to nature for local communities".*

3.20 The Council's approach prioritises on-site delivery of BNG, in line with the Biodiversity Gain Hierarchy, ensuring that biodiversity improvements are made close to the location of any loss and that they contribute to local ecological networks and community access to nature. Where on-site delivery is not feasible, the policy allows for off-site contributions, in accordance with the Environment Act.

**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?**

3.21 Yes, the Council acknowledges the need to modify Part 7 of Policy GWS3 and its associated implementation guidance to ensure the policy is effective in preventing adverse impacts on the integrity of the Epping Forest Special Area of Conservation (SAC).

3.22 To address this, the Council is proposing two modifications to the Local Plan. These are set out in the Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004):

Reference	Modification proposed	Page number in <a href="#">Regulation 22 Local Plan</a>	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO78.1	<p>New text in <b>bold</b> and removed text in <del>strike through</del>.</p> <p>Footnotes and hyperlink changes expressed between [ ] brackets</p> <p>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 <b>delivery of Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy</b>. <del>provision of Suitable Alternative Natural Greenspace.</del></p>	305	GWS3 part 7b
MO78.2	<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"> <li>• Strategic Access Monitoring and Management Strategy, which was adopted by Cabinet in July</li> </ul>	309-310	GWS3.7 Implementation text



	2022. • <b>Newham Special Area of Conservation Recreation Mitigation Strategy (2025).</b> Suitable Alternative Natural Green Space, which is being developed and will be published as additional guidance.		
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3.23 These changes reflect the updated evidence base provided by the Epping Forest SAC Recreation Mitigation Strategy (2025) [EB071] and have been agreed through the Statement of Common Ground with Natural England (SD056). The revised wording replaces the general reference to Suitable Alternative Natural Greenspace (SANG) with a direct reference to Newham's locally developed mitigation strategy.

3.24 Natural England has confirmed its support for this approach, which ensures that Policy GWS3 complies with the Conservation of Habitats and Species Regulations 2017 (as amended) and aligns with paragraph 187 of the NPPF (2023), by providing a clear and effective framework for avoiding adverse impacts on the SAC's integrity.

## GWS4 Trees and hedgerows

Q12.4 Is policy GWS4 justified and consistent with national policy and the London Plan?

### Council Response:

4.1 The Council considers that Policy GWS4 is justified, consistent with national policy (NPPF para. 136) and Policy G7 of the London Plan (2021) and appropriately reflects Newham's local context. The policy is supported by robust and up-to-date evidence, including:

- Green and Water Infrastructure Strategy (GWIS) (2025) [EB061–EB067]
- Sites of Importance for Nature Conservation (SINC) Review (2025) [EB070]
- Metropolitan Land Review (2025) [EB069]
- Characterisation Study [EB008–EB022]

4.2 Tree canopy cover in Newham is just 16%, the second lowest in London. The Mayor of London has set a target to increase canopy cover across the capital by 10% by 2050 (London Plan Policy G7). The GWIS highlights the environmental and economic value of urban trees in Newham, estimating an annual benefit of £800,000 from pollutant removal alone.

4.3 GWIS Principle 7: Shape Green Links – Connectivity is Key, recommends improving connections between green and water spaces, particularly given Newham's limited green space provision. Enhancing wildlife corridors and increasing tree and hedgerow planting are essential for:

- Strengthening ecological networks
- Supporting local distinctiveness
- Mitigating climate change impacts, including urban heat island effects and air pollution (GWIS Priority 2: Meeting the Challenge of the Climate Emergency)

4.4 Policy GWS4 supports the delivery of these objectives by requiring development to:

- Plan positively for the protection and enhancement of tree stock and canopy cover (NPPF para. 136; London Plan Policy G7)
- Mitigate the loss of trees and hedgerows through appropriate replacement and enhancement measures

- Safeguard existing and newly planted trees and hedgerows, ensuring their protection during construction and maintenance post-delivery

4.5 This approach ensures that development contributes to a resilient and connected green infrastructure network, aligned with national and regional policy, and responsive to Newham's specific environmental challenges.

## **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?

### **Council Response:**

5.1 The Council considers that Policy GWS5 is justified, consistent with national policy and the London Plan (2021), and appropriately tailored to Newham's local context.

5.2 In line with para.102 of the NPPF (2023) and Policy S4 of the London Plan (2021), Policy GWS5 is underpinned by robust and up-to-date evidence, including:

- Green and Water Infrastructure Strategy (GWIS) (2025) [EB061–EB067]
- Built Leisure Needs Assessment (BLNA) (2025) [EB045]

5.3 Newham has the highest proportion of young people in the UK, with 0–25-year-olds comprising 37% of the population. Access to safe, stimulating spaces for play and informal recreation is essential for their wellbeing. Such spaces offer opportunities for independence, social connection, and community engagement beyond home and school environments. These principles reflect the rights enshrined in the UN Convention on the Rights of the Child, including the right to play, gather, and participate in decisions affecting them.

5.4 Policy GWS5 ensures the Local Plan is positively prepared by requiring development to contribute to the delivery of play and informal recreation facilities that meet local needs. Specifically, the policy:

- Protects and enhances existing play and informal recreation facilities (NPPF para. 102; London Plan Policy S4)
- Maximises opportunities to create new provision in response to identified need (NPPF para. 102; London Plan Policy S4)

5.5 Evidence from the GWIS highlights a significant shortfall in play space provision. Fields in Trust recommends a standard of 0.25 hectares per 1,000 head of population (HoP). Newham currently provides 8.93 hectares of publicly accessible playgrounds for a population of 364,878, equating to 0.025 hectares per 1,000 HoP—just 10% of the recommended standard. To meet the standard today would require 91 hectares, indicating a shortfall of 82.29 hectares. With projected population growth, provision will fall to 0.019 hectares per 1,000 HoP by 2038, requiring 105.18 hectares of new play space to meet the standard.

5.6 This shortfall will be addressed through a combination of new provision within developments and enhancements to existing play and green spaces. The GWIS has informed site allocations and infrastructure requirements, ensuring that play space needs are embedded in future development proposals.

5.7 The Issues and Options consultation, in 2021, discussed the importance of child- and youth-friendly environments. The GLA's Making London Child-Friendly report notes that "cities that are safe for children tend to be safe for everyone," while ARUP's Cities Alive highlights that child-friendly planning benefits all citizens. These concepts have shaped the GWIS and BLNA assessments, which include:

- GWIS Section 5: Baseline mapping of play space (p.54) and distribution analysis (Figure 5.5, p.60) [EB063]
- BLNA Section 7: Urban sports and MUGA provision, with area-specific recommendations (Recommendations 15a–15b, p.167; 16a–16b, p.168) [EB045]

5.8 These findings have informed the Local Plan's neighbourhood-level recommendations and site-specific infrastructure requirements, ensuring that Policy GWS5 will be effective in meeting the recreational needs of young people and teenagers across Newham.