

LONDON BOROUGH OF NEWHAM

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

**MAIN MATTER 13:
SOCIAL INFRASTRUCTURE**

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.

BFN3 Social value and health impact assessments

Q13.1 Is policy BFN3 justified and consistent with national policy and guidance (PPG ID:53) and the London Plan

Council Response:

- 1.1 The Council considers Policy BFN3 to be justified, effective and consistent with national policy and guidance, and in general conformity with the London Plan (2021), subject to the proposed modification.
- 1.2 Policy BFN3 is underpinned by robust and up-to-date local evidence on the health needs of Newham and responds to:
 - NPPF (2023) – Chapter 8: Promoting healthy and safe communities (paras 8,96,97,135).
 - London Plan (2021) Policies GG3: Creating a healthy City and E9: Health and social care facilities.
- 1.3 Key evidence includes:
 - 50 Steps Health and Wellbeing Strategy, Newham (2024)
 - 50 Steps Evidence Base, Newham (2020 and 2024)
 - Towards a Better Newham COVID-19 Recovery Plan (2021)
 - Community Wealth Building Strategy (2021)
 - Social Integration Strategy (2021)
- 1.4 Newham faces significant health challenges:
 - Population of 373,000 (2023) projected to grow by 19% by 2030, with rapid ageing.
 - Third most deprived borough in London (IMD 2019) and the most ethnically diverse in the UK.
 - Persistent health inequalities, including gaps in life expectancy between the most and least deprived areas.
 - Common long-term conditions: hypertension, obesity, diabetes, depression, asthma.
 - Leading causes of death: cardiovascular disease, respiratory illness, cancer.
- 1.5 These demographic trends highlight the need for planning policies that address social determinants of health and reduce inequalities. Policy BFN3 ensures the Local Plan is positively prepared by requiring development to:
 - Deliver sustainable built and natural environments that enhance social value and support physical, mental, and social wellbeing (NPPF (2023): paras 8, 96, 97, 135 and London Plan Policy GG3).
 - Apply a Social Value–Health Impact Assessment (SV-HIA) process, combining traditional HIA with social value criteria, to:
 - Identify and mitigate negative impacts
 - Maximise positive outcomes
 - Reduce health inequalities
- 1.6 Policy BFN3 aligns with:
 - NPPF (2023) by embedding health and wellbeing into planning decisions and addressing inequalities.

- GOV.UK's Healthy and Safe Communities guidance by embedding health impact assessments in planning decisions, requiring early engagement with public health stakeholders, addressing inequalities and inclusion systematically and ensuring SV-HIA outcomes inform planning obligations and design expectations.
- London Plan (2021) by supporting policies GG3 and E9, and reflecting emerging best practice endorsed by the GLA and London Sustainable Development Commission (Embedding Social Value into the London Plan, 2024)¹ which highlights Newham as an exemplar for embedding social value through its emerging Local Plan, specifically referencing the SV-HIA approach.

1.7 It also responds to national and professional guidance:

- RTPI's 'Enabling Healthy Placemaking' (2020)² - formalising health principles in planning.
- Planning for healthy places: a practical guide for local authorities on embedding health in Local Plans and planning policies in England (2024)³ - UWE/TCPA guidance recommending HIAs with clear triggers and supporting tools.

1.8 Policy BFN3 introduces a screening process for major development and proposals likely to impact health or social value, ensuring proportionality and clarity for applicants. Once triggered, the SV-HIA provides a structured framework aligned with:

- Newham's 50 Steps Health and Wellbeing Strategy (2024)
- NHS HUDU Rapid HIA methodology (2019)

1.9 Policy BFN3 is supported by a suite of practical tools to ensure effective delivery:

- Guidance Note – clear expectations for applicants [EB005]
- Screening Tool – integrated into validation checklist [EB006]
- SV-HIA Checklist – intuitive framework with targeted questions [EB007]

1.10 These mechanisms embed health and wellbeing into planning in a way that is locally meaningful and regionally consistent.

1.11 To improve clarity and effectiveness, the Council proposes the following modifying the implementation text to BFN3 Part 2, as set out in the Schedule of Proposed Modifications [SD004]:

Reference	Modification proposed	Page number in Regulation 22 Local Plan	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO15.1	New text in bold and removed text in striketrough . Footnotes and hyperlink changes expressed between [] brackets	43	BFN3.2 Implementation text

¹ [The London Sustainable Development Commission, Embedding Social Value into the London Plan, Enhancing community wellbeing and sustainable growth through planning policy, We Made That, 2023](#)

² Enabling healthy placemaking, Overcoming barriers and learning from best practices, RTPI, 2020, <https://www.rtpi.org.uk/media/x3ydymce/enabling-healthy-placemaking.pdf>

³ Bird, E L & Hyde, G et al. 2024. Planning for healthy places: a practical guide for local authorities on embedding health in Local Plans and planning policies in England. <https://www.tcpa.org.uk/wp-content/uploads/2024/09/Planning-for-healthy-places-Accessible.pdf>

	i. Major development ii. Loss, gain or reconfiguration of social infrastructure floorspace iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops iv. Loss, gain or reconfiguration of publicly accessible green space v. Development impacting an existing or creating a new internal or external permanent market		
--	---	--	--

1.12 This proposed modification reflects NPPF para 90(c) and Local Plan Policy HS4, supported by policy recommendation LBN18 in the Retail Needs Assessment (p.143, 2024).

1.13 Policy BFN3 is therefore justified by local evidence and health needs, supported by regional best practice and is consistent with national and London Plan policy. It is effective, with clear mechanisms for implementation it embeds health and social value into planning, helping to create healthier, more equitable places in Newham.

SI1 Existing community facilities and health facilities

Q13.2 Is policy SI1 justified, effective and consistent with national policy and the London Plan? In particular, is the reference in part 2 (that if the loss of a facility can be demonstrated as being acceptable, then the preferred alternative use will be for the maximum viable amount of affordable housing) justified and will it be effective?

Council Response:

2.1 The Council considers Policy SI1 to be justified, effective and consistent with national policy and in general conformity with the London Plan (2021), subject to the proposed modifications. It reflects Newham's local context and is supported by Duty to Cooperate partners, including NHS Property Services and NHS North East London.

2.2 Policy SI1 is underpinned by robust and up-to-date local evidence on the need for social infrastructure and the uneven distribution of facilities across the borough. Key evidence includes:

- Community Facilities Needs Assessment (CFNA) (2022) [EB035–EB044]
- Infrastructure Delivery Plan (IDP, 2024) [EB004]
- 50 Steps Health and Wellbeing Strategy (2024) and Evidence Base (2020)
- Retail and Leisure Study (2022) [EB029–EB030]
- Characterisation Study (2024) [EB08–EB022]

2.3 These studies demonstrate the borough's infrastructure needs and health objectives, justifying Policy SI1's approach to safeguarding facilities and requiring a clear sequential process for any loss, including robust evidence of surplus provision and engagement with stakeholders.

2.4 In addition to the above evidence base, the Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan (Policy S2) and the NPPF (paragraph 20).

Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2025).

2.5 Policy SI1 accords with:

- NPPF (2023) – Paragraph 20 and Chapter 8 (paras 96–100) by:
 - Planning positively for community facilities
 - Guarding against the loss of valued facilities
 - Ensuring an integrated approach to location and delivery
- London Plan (2021) – Policy S1 (Developing London’s social infrastructure), Policy H4 (Delivering affordable), Policy S2 (Health and social care facilities) and Policy HC7 (Protecting public houses):
 - Policy approach is informed by a needs assessment for community facilities (CFNA, 2022 [EB044])
 - Safeguarding and reprovion of facilities, allowing loss where there is evidence of no need
 - Maximising affordable housing delivery

2.6 Where the loss of a social infrastructure facility is acceptable, Part 2 of SI1 requires the preferred alternative use to be the maximum viable amount of affordable housing, unless in a Primary Shopping Area, Strategic Industrial Location, or Local Industrial Location. This approach:

- Is consistent with NPPF Chapter 5 and London Plan objectives to make effective use of land (Policy GG2).
- Is supported by whole-plan viability testing (BNP Paribas Real Estate, 2024 [EB099]), confirming deliverability and effectiveness.

2.7 This ensures that land released from social infrastructure contributes to meeting the borough’s acute housing needs, particularly affordable housing.

2.8 Appendix B of the CFNA [EB044] provides a starting point for applicants to assess local need. To aid clarity, the Council proposes the following modifications, as set out in the Schedule of Proposed Modifications [SD004]:

Reference	Modification proposed	Page number in Regulation 22 Local Plan	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO46	<p>New text in bold and removed text in strike through.</p> <p>Footnotes and hyperlink changes expressed between [] brackets</p> <p>An assessment is likely to require evidence of the following:</p> <ul style="list-style-type: none"> • an excess of facility provision - an up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods should be provided. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. 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. 	172-173	SI1.1 Implementation text
MO47	<p>A needs-based 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 all relevant social infrastructure. 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. 	178	SI2.1 Implementation text

2.9 The policy approach is effective because:

- It is informed by the CFNA [EB044] and IDP priorities [EB004], providing clarity on where new facilities are needed most.
- It encourages early engagement with infrastructure providers, health partners, ward members, the Council's Resident, Engagement and Participation Team, community managers, the intended operator and the local community, ensuring alignment with local need and wider social infrastructure / healthcare strategies and facilitating successful delivery.
- It is linked to Neighbourhood policies and site allocations and is supported by the Site Allocation and Housing Trajectory Methodology Note (2025).
- It will be monitored, through Key Performance Indicator 19. Net provision of Community Facilities, reported in Newham's Authorities Monitoring Report.

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).
- b) Part 4 which states that speculative social infrastructure development will not be supported.
- c) Whether the policy will provide an effective approach for proposals for large scale places of worship with specific characteristics (including for Islamic education, that reflect the specific accessibility and inclusion needs of women, children, elderly and those with disabilities).

Council Response:

3.1 The Council considers Policy SI2 to be justified, effective and consistent with national policy and in general conformity with the London Plan (2021). It reflects Newham's local context and is supported by Duty to Cooperate partners, including NHS Property Services and NHS North East London.

3.2 Policy SI2 addresses the need for new social infrastructure to support Newham's rapidly growing and diverse population. It is underpinned by robust and up-to-date local evidence, including:

- Community Facilities Needs Assessment (CFNA) (2022) [EB035 - EB044]
- Infrastructure Delivery Plan (IDP, 2024) [EB004]
- 50 Steps Health and Wellbeing Strategy, Newham (2024)
- 50 Steps Evidence base, Newham (2020)
- Retail and Leisure Study (2022) [EB029 – EB30]
- Characterisation Study (2024) [EB08 – EB022]

3.3 These studies demonstrate Newham's infrastructure needs and an uneven distribution of facilities, justifying SI2's proactive approach to planning positively for new provision and ensuring integration with housing and employment growth.

3.4 Policy SI1 accords with:

- NPPF (2023) - Paragraph 20 and Chapter 8 (paras 96 -100) by:
 - Planning positively for the provision of community facilities
 - Ensuring an integrated approach to their location and delivery
- London Plan (2021)
Policy: S1 (Developing London's social infrastructure), by:
 - Applying a policy approach informed by a needs assessment for community facilities (CFNA, 2022 [EB044])
 - Integration of social infrastructure with growth areas
 - Requires high quality, inclusive social infrastructure
 - Ensures best use of land, including co-location and the rationalisation or sharing of facilities
 - Directing new facilities to locations which are easily accessible by public transport, cycling and walking and encouraged in town centres.
 - Securing sites for community facilities (with more detail in the site allocations and Neighbourhood policies)
- Policy S2 (Health and social care facilities), by:
 - Securing sites for local health and social care needs (with more detail in the site allocations and Neighbourhood policies)
- Policy S6 (Public toilets), by:
 - Requiring large-scale developments to provide and secure the management of free publicly accessible toilets and changing spaces.

3.5 Policy SI2 also supports London Plan Policy GG2 (making the best use of land) and GG3 (creating a healthy city), ensuring that infrastructure delivery underpins sustainable growth.

3.6 The policy approach is effective because:

- It is informed by CFNA mapping assessment [EB044], and IDP [EB004] priorities, providing clarity on where new facilities are needed most.
- It encourages early engagement with infrastructure providers, health partners, ward members, the Resident, Engagement and Participation team, community manager the intended operator and the local community, ensuring alignment with local need and wider social infrastructure / healthcare strategies.
- It is linked Neighbourhood policies and site allocations infrastructure requirements and is supported by the Site Allocation and Housing Trajectory Methodology Note (2025).
- Delivery is secured through planning obligations, where a residential development generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site, ensuring timely provision alongside growth.
- Delivery will be monitored, through Key Performance Indicator 2. (Delivery of infrastructure requirements) and Key Performance Indicator 19. (Net provision of Community Facilities), reported in Newham's Authorities Monitoring Report.

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).

3.7 The Council considers the requirement in part 2c to be justified, effective and consistent with national policy and in general conformity with the London Plan (2021).

3.8 Policy SI2 ensures that larger community facilities (1,000 sqm or more) or those with a wider catchment are located in accessible, sustainable locations. This supports:

- NPPF 2023:
 - Paragraph 90: policies should support the role of town centres at the heart of local communities.
 - Paragraph 97: policies should plan positively for shared spaces and community facilities to enhance sustainability and residential environments.
- London Plan 2021:
 - Policy S1 Part E: requires new facilities to be easily accessible by public transport, cycling, and walking, and encourages their location in high streets and town centres.

3.9 This approach also aligns with London Plan objectives to promote sustainable travel (Policy T1) and town centre vitality (Policy SD6).

3.10 The policy is deliverable within Newham's spatial strategy, supported by its network of identified town and local centres (Policy HS1). Directing larger or higher-trip-generating facilities to town centres:

- Reduces car dependency and supports sustainable transport
- Enhances town centre viability and vitality, as evidenced by:
 - Retail and Leisure Study (2022 [ED029]) - highlights the importance of town centres as hubs for social, cultural, and commercial activity, including community facilities (Paragraph 3.4, p20).
 - Community Facilities Needs Assessment (2022 [EB036]) - recommends that larger facilities be located in town centres for accessibility and to benefit from footfall (page 23, part 2.3.1).

3.11 Part 2d aligns the NPPF approach to main town centre uses (para 91) and the 300 sqm gross impact assessment threshold recommended in the Retail and Leisure Study (2022, LBN13, p140 [EB029]).

3.12 The 1,000 sqm threshold is supported by:

- The Town and Country Planning (Development Management Procedure) (England) Order 2015 definition of major non-residential development
- TfL thresholds for transport assessments, ensuring facilities attracting significant trips are located where sustainable transport options exist.

3.13 This approach ensures that larger community facilities are located in accessible, sustainable locations, supporting town centre vitality and reducing adverse impacts on residential areas. It is therefore justified, effective, and consistent with national policy and the London Plan (2021).

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

- 3.14 The Council considers the requirement in Part 4—that speculative social infrastructure development will not be supported—to be justified, effective, and consistent with national policy and in general conformity with the London Plan (2021).
- 3.15 The Community Facilities Needs Assessment (CFNA, 2022) and the consultation undertaken with community groups as part of this work, highlighted the drawbacks of providing speculative community space. Vacant or underused facilities often result when spaces are designed without a clear end user or operational plan. A key recommendation from the CFNA was to avoid speculative provision (EB036, para 2.36, p.24).
- 3.16 Community facilities typically have specific design and operational requirements, which vary by type. For example:
- Safeguarding considerations for many operators
 - Specialist layouts and fit-outs to support activities and management
- 3.17 Providing generic or speculative space risks creating facilities that are unsuitable for intended uses, undermining delivery and long-term sustainability.
- 3.18 Part 4 of the policy ensures that new community facilities are needs-led, based on robust evidence and engagement with operators, rather than speculative supply. It supports efficient use of land and resources, consistent with the NPPF's emphasis on planning positively for facilities that meet identified needs (para 97).
- 3.19 Part 4 reflects best practice and evidence-based recommendations, ensuring that social infrastructure delivery is targeted, viable, and sustainable.

c) Whether the policy will provide an effective approach for proposals for large scale places of worship with specific characteristics (including for Islamic education, that reflect the specific accessibility and inclusion needs of women, children, elderly and those with disabilities).

- 3.20 The Council considers that Policy SI2 provides an effective approach for proposals for large-scale places of worship, including those with specific characteristics such as Islamic education and facilities designed to meet the accessibility and inclusion needs of women, children, older people, and those with disabilities.
- 3.21 Policy SI2 requires that proposals for new, expanded, or improved community facilities are needs-led, based on robust evidence. This includes undertaking a needs-based assessment to demonstrate that the facility meets an identified demand that will not be met by planned delivery. This ensures that provision responds to the diverse requirements of Newham's communities.
- 3.22 Under Policy SI2, faith facilities—including large-scale places of worship—can be delivered where they meet the policy criteria, including:
- Demonstrating unmet need
 - Ensuring accessibility and inclusion
 - Integrating with the spatial strategy and transport network
- 3.23 This approach supports the delivery of facilities that are fit for purpose, inclusive, and sustainable. Policy SI2 therefore provides a clear and effective framework for accommodating large-scale places of worship with specific design and accessibility

requirements, ensuring that such facilities are planned positively and in response to identified community needs.

SI3 Cultural facilities and sport and recreation facilities

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

Council Response:

4.1 The Council considers Policy SI3 to be justified, effective, and consistent with national policy and in general conformity with the London Plan (2021), subject to the proposed modification. It reflects Newham's local context and responds to the borough's identified needs for cultural, sport and recreation facilities and is supported by Duty to Cooperate partner Sport England.

4.2 Policy SI3 is underpinned by robust, up-to-date evidence which demonstrates an uneven distribution and need for facilities:

- Building Newham's Creative Future (2022)
- Community Facilities Needs Assessment (CFNA) (2022) [EB035 - EB044]
- Retail and Leisure Study (2022) [EB029 – EB30]
- Characterisation Study (2024) [EB08 – EB022]
- Built Leisure Facilities Needs Assessment (2024) [EB045]
- 50 Steps Health and Wellbeing Strategy, Newham (2024)
- 50 Steps Evidence base, Newham (2020)

4.3 These studies justify safeguarding facilities and requiring a sequential approach to any loss, including evidence of surplus and stakeholder engagement.

4.4 Policy SI3 accords with:

- NPPF (2023) – Paragraphs 8 and 20, Chapter 8 (paras 96–100) and paragraphs 102 and 103 by:
 - Supporting health, social and cultural well being
 - Planning positively for social, recreational and cultural facilities
 - Guarding against the loss of valued facilities
 - Ensuring an integrated approach to location and delivery
 - Meeting need for sport and recreation facilities based on robust and up-to-date assessment of need
- London Plan (2021)
Policy S1 (Developing London's social infrastructure) by:
 - Applying a policy approach informed by a needs assessment for cultural facilities (CFNA, 2022– theatres, galleries, museums and live music, comedy and dance venues [EB044])
 - Safeguarding and re-provision of facilities, allowing loss where there is no evidence of need

Policy S5 (Sports and recreation facilities) by:

- Applying a policy approach informed by a needs assessment for sport and recreation facilities (Built Leisure Facilities Needs Assessment, 2022 [EB045])
- Safeguarding and reprovion of facilities, allowing loss where there is evidence of no need
- Securing sites for a range of sport and recreation facilities (with more detail in the site allocations and Neighbourhood policies)

Policy HC5 (Supporting London's cultural and creative industries) by:

- Protecting existing cultural venues and facilities where appropriate
- Supporting the development of new cultural venues and facilities in town centres and places with good public transport connectivity

4.5 The policy approach is effective because:

- It is informed by the CFNA [EB044] and the Built Leisure Facilities Needs Assessment [EB045], identifying priority areas for provision.
- It encourages early engagement with infrastructure providers, Sport England, ward members, the Resident, Engagement and Participation team, community manager the intended operator and the local community, ensuring alignment with local need and wider cultural, sport and recreation strategies.
- It is linked to Neighbourhood policies and site allocations and is supported by the Site Allocation and Housing Trajectory Methodology Note (2025).
- Delivery will be monitored through Key Performance Indicator 2 (Delivery of infrastructure requirements) and Key Performance Indicator 20 (Net provision of cultural and sport and recreation facilities), reported in Newham's Authorities Monitoring Report.

4.6 To aid clarity, the Council proposes the following modification as set out in the Schedule of Proposed Modifications [SD004] and as agreed through the statement of common ground with the Lee Valley Regional Park Authority [SD065]:

Reference	Modification proposed	Page number in Regulation 22 Local Plan	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
MO10.3	<p>3.139 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 its 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</p>	186	SI3 Justification text

	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.		
--	--	--	--

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?

Council Response:

5.1 The Council considers Policy SI4 to be justified, effective and consistent with national policy and in general conformity with the London Plan (2021), subject to the proposed modifications. It reflects Newham's local context and is supported by Duty to Cooperate partner Sport England.

5.2 Policy SI4 addresses the need for new education and childcare facilities to support Newham's rapidly growing and diverse population. It is underpinned by robust and up-to-date local evidence, including:

- Education Places for All, London Borough of Newham (2022)
- Childcare Sufficiency Assessment, London Borough of Newham (2021)
- Infrastructure Delivery Plan (IDP, 2024) [EB004]

5.3 These studies demonstrate Newham's education infrastructure needs, justifying SI4's proactive approach to planning positively for new education and childcare provision and ensuring integration with housing and employment growth.

5.4 Policy SI1 accords with:

- NPPF (2023) - Paragraph 20, paragraph 34 and Chapter 8 (paras 96, 97 and 99) by:
 - Planning positively for education facilities
 - Setting out when education contributions will be expected
 - Ensuring an integrated approach to location and delivery
 - Taking a proactive, collaborative approach to meeting the educational needs
- London Plan (2021)
Policy: S3 (Education and childcare facilities) by:
 - Applying a policy approach informed by Newham's Education Places for All Strategy (2002) and Newham's Childcare Sufficiency Statements
 - Safeguarding and reprovision of education facilities, allowing loss only where there is evidence of no need
 - Securing sites for education and childcare facilities where there is an identified need (with more detail in the site allocations and Neighbourhood policies)
 - Locating facilities in accessible locations, away from busy roads and integrating into existing footpath and cycle networks
 - Supporting community and recreational use of education facilities
 - Ensuring new facilities are inclusive with suitable outdoor space
 - Encouraging proximity to parks or green spaces

5.5 Policy SI4 also supports London Plan Policy GG2 (making the best use of land) and GG3 (creating a healthy city), ensuring education delivery underpins sustainable growth.

5.6 The Local Plan Team worked with colleagues in Newham's Education Team to understand the need for education facilities and childcare over the plan period. Policy SI4 is justified by Newham's Education Places for All Strategy (2022), which provides an important framework for effective planning of education provision to meet the needs of Newham's population. The plan sets out how the Council will carry out its statutory duty to ensure sufficiency of mainstream and specialist school places based on most recent data, taking into consideration the decline in birth rate and future demand due to housing development. It also provides key stakeholders including schools with trends and data to inform their future decision-making on school organisation. The Policy approach is further justified by Newham's Childcare Sufficiency Reports. These annual reports set out how the Council is meeting its statutory duty to secure sufficient childcare.

5.7 A number of representations were made at the Regulation 19 consultation, seeking an Islamic education facility at site allocation N7 SA1. This is not a site identified as necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham's Education Places for All Strategy (2022). However, this does not preclude an applicant from making the case for the need for an education use on this site, where unmet demand can be demonstrated. In doing so, the requirements of Local Plan Policy SI4 would need to be met.

5.8 The Council's statutory duty is to ensure we have sufficient education provision that meets the needs of our community, which we have demonstrated both now and over the plan period. This is evidenced in the Places for All Strategy (2022) and through the associated education sites secured in Local Plan. The evidenced need for education and childcare spaces is reflected in the table in the implementation text for part 1 of the policy and in the relevant Neighbourhood policies and infrastructure requirements on respective site allocations.

5.9 A school whether Special Educational Needs (SEN) school or a Faith school, cannot be set up or opened by the Local Authority. It must be a 'Free School', which can be set up and run by individual groups of parents, teachers, businesses, universities, independent schools, charities or voluntary groups. The process entails applying to the Department for Education (DfE), with the application demonstrating a clear need for the school, a viable financial plan, and a compelling vision.

5.10 Newham's current and previous data on education need has not suggested a requirement for a state-funded Islamic School. Newham's schools are inclusive and follow the national curriculum. State-funded Faith schools are required to follow the national curriculum but have the freedom to choose how they teach religious studies. Should there be compelling demand and need for a state-funded Islamic school, then the Council's Education Team would support such an application. It should be noted that there are at five independent Islamic schools in Newham.

5.11 Policy SI4 is effective because:

- It is informed by the Places for All, London Borough of Newham (2022) and Newham's Childcare Sufficiency Assessment (2021), providing clarity on where and when new education and childcare facilities are needed.
- It is linked to Neighbourhood policies and site allocations infrastructure requirements and is supported by the Site Allocation and Housing Trajectory Methodology Note (2025).

- Delivery is secured through planning obligations where residential development generates additional demand for education places but where a new facility is not being delivered on site, ensuring timely provision alongside growth.
- Delivery will be monitored through Key Performance Indicator 2. (Delivery of infrastructure requirements), reported in Newham's Authorities Monitoring Report.

5.12 To aid clarity, the Council proposes the following modifications as set out in the Schedule of Proposed Modifications [SD004]:

Reference	Modification proposed	Page number in Regulation 22 Local Plan	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
	New text in bold and removed text in strike through . Footnotes and hyperlink changes expressed between [] brackets		
MO48	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 2038	192	SI4.1 Implementation text
MO9.2	N11.SA3 Royal Road. N4.SA4 Royal Road	193	SI4.1 Implementation text

SI5 Burial space and related facilities

Q13.6 Is policy SI5 justified, effective and consistent with national policy and the London Plan? In particular, will part 2 be effective in helping to meet the need for additional burial space and related facilities?

Council Response:

6.1 The Council considers Policy SI5 to be justified, effective and consistent with national policy and in general conformity with the London Plan (2021), subject to the proposed modifications. It reflects Newham's local context and is supported by Duty to Cooperate partners the London Borough of Redbridge.

6.2 Policy SI5 addresses the need for burial space to meet the Newham's needs. It is underpinned by robust and up-to-date local evidence, including:

- Newham Burial Space Study (2024) [EB047]
- An Audit of London Burial Provision A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group, University of York (2011)

6.3 These studies demonstrate Newham's burial space need and justify Policy SI5's approach to protecting existing burial space and planning positively for new provision.

6.4 Policy SI5 accords with:

- NPPF (2023) - there is no specific reference to burial needs, other than paragraphs 154 and 155, which relate to cemeteries within the Green Belt.
 - the City of London Cemetery and Crematorium in Newham Borough Council is located within Green Belt.
- London Plan (2021)
Policy: S7 (Burial space), by:
 - Safeguarding burial space facilities
 - Supporting proposals which result in increased provision, including for those parts of the community for whom burial is the only option
 - Applying a policy approach informed by Newham's Burial Space Study (2024) [EB047] and Newham's Burial Space Provision and Options Appraisal Report (2025), which accords with Policy S7 by acknowledging grave reuse where culturally appropriate, examining intensification and extension, and assessing provision in adjoining authorities.
 - Fully assessing the needs of different faiths, including those that prohibit grave reuse.

6.5 Local Authorities have no statutory duty to provide burial spaces; however, we recognise the importance of suitable and local spaces to ensure dignity in death and for the bereaved. The 2011 GLA Audit indicated that provision in Newham is sustainable due to existing cemeteries and grave reuse. However, funeral and burial practices vary widely across religions and belief systems, each with unique customs and requirements.

6.6 Newham contains a large number of in-use and historic cemeteries: West Ham Cemetery, the City of London Cemetery and Crematorium, the East London Cemetery and Crematorium, Woodgrange Park Cemetery and three Jewish cemeteries. All but the three Jewish cemeteries remain available for new burial plots, but space is reducing and predominantly consists of reused graves.

6.7 Newham's diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. Policy SI5 therefore supports additional burial space to meet these needs.

6.8 Part 2 of the policy is effective because it provides a positive policy framework for new burial space proposals, prioritising needs of faith groups unable to use reused graves. Delivery is supported by proactive collaboration with other boroughs to identify suitable burial space sites, led by Newham's Environment and Sustainable Transport Team.

6.9 The policy approach is effective because:

- It is informed by Newham Burial Space Study (2024) providing clarity on the type of burial space needed by Newham's population.
- It requires early co-design with the relevant community for who the burial space is intended.
- Delivery will be monitored through Key Performance Indicator 21. (Net completions of Burial space), reported in Newham's Authorities Monitoring Report.

6.10 In addition to the 2024 Burial Space Study, the Council is progressing a further piece of work to examine burial space in more detail. This Burial Space Provision and Options Appraisal Report will build on the 2024 study and go beyond the planning requirement to consider practical options the Council could take forward to address the need for burial space in Newham.

- 6.11 To aid clarity and reflect updates to the evidence base, the Council previously proposed modifications MO49.1 and MO49.2, which referred to the emerging Burial Space Provision and Options Appraisal Report. It was anticipated that this additional study would have been completed in 2025. However, as this work is still underway, we are proposing the following revised modifications to provide a clearer picture of the available evidence on burial space:

Modification proposed New text in bold and removed text in strike through . Footnotes and hyperlink changes expressed between [] brackets	Page number in Regulation 22 Local Plan	Part of the Plan Paragraph number, policy reference and part, implementation text reference etc.
<p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham’s diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. As such we support the provision of additional burial space, in particular to meet the needs of Newham’s communities which cannot be met within the existing provision. As such, in order to better understand this need and consider ways it can be met, we are commissioning a Newham’s Burial Space Study (2024) provides a local understanding of Newham’s burial space needs. These studies provide an audit of the borough’s existing burial space provision and are which will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p>	172-173	SI1.1 Implementation text
<p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham’s communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham’s Burial Space Study (2024) and any relevant future local and/or regional burial space evidence base.</p>	190	SI5.2 Implementation text
<p>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme’s development. Applicants are therefore encouraged to engage early in the development process with ward members, the Council’s Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. and opportunities for co-design with relevant communities, undertaken early in the design process.</p>	198	SI5.2 Implementation text