

# **LONDON BOROUGH OF NEWHAM**

## **LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC IN7: ACTION POINTS FROM WEEK 4 HEARING SESSIONS**

**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.

### Information requirements for planning applications

**AP40.** Council to amend the proposed modification to paragraph i.29, and/or prepare a potential modification to another part of the Plan, to clarify how the information requirements for planning applications referred to in policies could be provided in a proportionate way that avoids duplication and imposing unnecessary burdens on applicants.

#### Council Response:

1.1 Once adopted, the Council's [Local Validation checklist](#) will be amended with our DM colleagues to address the following modification which is proposed after para i.29. This is also included in the Schedule of Proposed Modifications (ED020).

i.29 The Local Plan, together with the London Plan, make up the borough's development plan and will be used to make decisions on planning applications. The Plan must be read as a whole and all policies (**shown in shaded boxes, identified by their Policy reference**) relevant to the proposal will be used to assess its compliance and acceptability. **The text surrounding the policy boxes including the introductory paragraphs, Planning Obligations, Justification and Implementation provides important context, evidence, explanation and guidance on how the policies should be interpreted and applied.**

**i.30 Most of the requirements and assessments set out in the plan can be incorporated into standard submission documents, such as, but not limited to, planning statements, design and access statements, and energy statements. The Council's local validation list (Planning Application Requirements) will specify which requirements can be integrated into these documents and which must be provided as standalone assessments to support the application. The local validation list will also set out the stages at which these requirements and assessments are needed.**

#### Site maps / indicative diagrams

**AP41.** Council to amend the proposed modification to para 4.3 to combine the last two sentences to read: "The delivery of these sites will be shaped through co-designed masterplanning in accordance with policy BFN2 which may demonstrate that an alternative layout deliver outcomes consistent with the allocation policy and other policies in the Plan" (or similar).

#### Council Response:

2.1 The following modification is proposed for Paragraph 4.3 (Section 4: Neighbourhood, Implementation text). This is also included in the Schedule of Proposed Modifications (ED020).

4.3 All applications will be assessed against the relevant neighbourhood policy and, where applicable, the site allocation **requirements**. ~~Site allocation policies will inform and guide development on specific sites. The neighbourhood policies and site allocations are to be read alongside the other policies in the Local Plan which set out the standards and requirements for different uses and factors such as design and transport.~~

Within these neighbourhoods, site allocations have been identified to deliver new homes and jobs alongside necessary infrastructure, such as green space, transport connections and social infrastructure (including community, health, education, sport and informal recreation facilities).

Each site allocation includes illustrative diagrams showing how development could be delivered. These diagrams are indicative and demonstrate how the principles and requirements in this section might be implemented. The delivery of these sites will be shaped through co-designed masterplanning in accordance with policy BFN2 which may demonstrate that an alternative layout could deliver outcomes consistent with the allocation policy and other policies in the Plan.

When determining an application, flexibility may be applied to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme. This approach ensures that the site allocations remain deliverable within the context of sustainable development.

The neighbourhood policies and site allocations are strategic policies for the purposes of neighbourhood planning.

### Co-designed masterplanning

**AP42.** Council to prepare a potential modification to policy BFN2 part 1 to set out a positive approach to achieving comprehensive development that is effectively coordinated with infrastructure delivery, including on large complex sites in multiple ownership.

#### Council Response:

3.1 The Council proposes the following modification to set out the objective of policy BFN2 Part 1 in positive terms, while recognising that it applies to all developments, including smaller sites and non-major development where land ownership conditions may provide opportunities to further optimise development, without it being considered a phased development, and proportionate to the context of the site as explained in the implementation text. This is also included in the Schedule of Proposed Modifications (ED020).

1. Sites should be designed and developed comprehensively **and collaboratively to ensure that their delivery**. ~~Piecemeal delivery will be resisted, particularly where it would prejudice~~ **supports** the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles **and that** ~~or where the timing of delivery would be unsupported~~ **is supported** by infrastructure.

**AP43.** Council to prepare a potential modification to policy BFN2 part 4 to read:

“All phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a meanwhile use strategy which outlines how those parts will be put to meanwhile uses which do not prejudice the delivery of the final scheme” (or similar).

#### Council Response:

3.2 The following modification is proposed to policy BFN2 part 4. This is also included in the Schedule of Proposed Modifications (ED020).

4. All phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how **those parts** will be ~~vacant and underused plots will be~~ **safely activated through appropriate meanwhile uses without prejudicing the delivery of the permanent scheme.**

### Developer contributions and infrastructure delivery

**AP44.** Council to prepare a potential modification to policy BFN4 to clarify that the prioritisation set out in part 3 would be applied having regard to site specific considerations and the need to provide any new or improved infrastructure or other mitigations that are essential to make the proposal acceptable in planning terms.

#### Council Response:

4.1 The following modification is proposed to policy BFN4. This is also included in the Schedule of Proposed Modifications (ED020).

BFN 4( 3) Where substantiated financial viability constraints remain, applicants should deliver the maximum viable level of obligations, **taking account of site specific considerations and the need to provide any new or improved infrastructure or other mitigation necessary to make the proposal acceptable in planning terms.** It is expected that the Plan's objectives will be prioritised as follows:

- a. affordable and family housing
- b. local access to employment and training
- c. delivery of ~~required~~ infrastructure.

### Zero carbon development

**AP45.** Council to prepare a draft modification to policy CE2 part 3(b)(i) to set a Energy Intensity Use standard for student accommodation that is technically feasible and financially viable<sup>1</sup>.

#### Council Response:

5.1 Following discussion with the evidence base consultant Etude regarding the technical feasibility and financial viability of applying the Energy Use Intensity standard to student accommodation, the Council has drafted the modification set out below. The evidence supporting this figure is provided in Appendix 1. This is also included in the Schedule of Proposed Modifications (ED020).

#### Policy CE2 part 3(b)(i)

3. New development should be designed and constructed to be Net Zero Carbon in operation, using as little energy as possible over a year and should meet the following standards:

- a. All new residential units should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m<sup>2</sup> GIA/yr.
- b. New non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following by the following use:
  - i. Student accommodation – ~~35~~ **55** kWh/m<sup>2</sup> GIA/yr.

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<sup>1</sup> The Council referred to this being in the range 50 to 74 kWh/m<sup>2</sup>GIA/year.

**AP46.** Council to consider whether the requirement for development to generate at least 80 kWh/m<sup>2</sup> per building footprint per year of renewable energy is technically feasible and financially viable for student accommodation development

**Council Response:**

5.2 Following discussion with the evidence base consultant Etude regarding the technical feasibility and financial viability of renewable energy generation for student accommodation and other tall buildings, the Council has drafted the modification set out below. The evidence supporting this figure is provided in Appendix 1. This is also included in the Schedule of Proposed Modifications (ED020).

Policy CE2 part 4

4. New development should generate renewable energy on site, to a level equivalent to, or in excess of, the predicted annual energy demand of the building, in accordance with the following requirements:

- a. As a minimum, the amount of energy generated in a year must be:
  - ~~i. at least 80 kWh/m<sup>2</sup> per building footprint per annum for all building types except industrial buildings; and~~
  - ~~ii. at least 120 kWh/m<sup>2</sup> per building footprint per annum for industrial buildings~~
  - i. at least 120 kWh/m<sup>2</sup> per building footprint per annum for industrial buildings; and**
  - ii. at least 80 kWh/m<sup>2</sup> per building footprint per annum for all building types except industrial buildings that are under 21 metres in height; and**
  - iii. at least 50 kWh/m<sup>2</sup> per building footprint per annum for all building types except industrial buildings that are over 21 metres in height**

Implementation text Policy CE2 part 4

On-site renewable energy generation (e.g. through PVs) has been maximised and achieves at least ~~80 kWh/m<sup>2</sup> building footprint for all building types (and 120 kWh/m<sup>2</sup> building footprint for industrial buildings)~~ **levels set in the Local Plan in CE2.4**

**AP47.** Council to prepare a potential modification to implementation text CE2.2 paragraph 4 to read:

“ ... development may connect to a heat network powered by gas only where an effective decarbonisation strategy has been agreed with the Council” (or similar).

**Council Response:**

5.3 The following modification is proposed to implementation text CE2.2 paragraph 4. This is also included in the Schedule of Proposed Modifications (ED020).

Implementation text Policy CE2 part 2

Decarbonisation of existing fossil fuel powered heat networks is strongly encouraged. A development may connect to a heat network powered by gas only **where an effective decarbonisation strategy has been agreed with the Council.** ~~where there is a fully funded~~

~~decarbonisation plan that will be implemented within the lifetime of the plan.~~ The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.

### Embodied carbon

**AP48.** Council to prepare a draft modification to policy CE3 part 6 to set an embodied carbon limit that is technically feasible and financially viable<sup>2</sup>.

#### Council Response:

6.1 Following discussions with the evidence base consultant Etude regarding the technical feasibility and financial viability of embodied carbon limits, the Council has drafted the modification set out below. The evidence supporting this figure is provided in Appendix 1. This is also included in the Schedule of Proposed Modifications (ED020).

#### Policy CE3 part 6

6. Major developments are expected to meet embodied carbon limits of less than 500kg CO<sub>2</sub>/m<sup>2</sup>. **700kg CO<sub>2</sub>/m<sup>2</sup>.**

### Gypsy and traveller accommodation

**AP49.** Council to amend the potential modification to policy H10 and/or reasoned justification to refer to the London Gypsy and Traveller Accommodation Assessment November 2025 and what that, along with the Council's 2022 assessment, indicate the total need for pitches is in Newham.

#### Council Response:

7.1 Please see the below modifications to the policy which addresses the action point. The London Gypsy and Traveller Accommodation Needs Assessment (GTANA) only extends to 2031/32. Therefore, to calculate an accurate need figure for the years 2032/33-2036/37 we have:

- Used the need identified in Newham's Gypsy and Traveller Accommodation Assessment (need for an additional 2 pitches – EB057, Figure 16, p.54).
- Used the growth rate assumed in the London Gypsy and Traveller Accommodation Needs Assessment (GTANA) for Households in bricks and mortar homes (need for an additional 3 pitches – EOD008, paragraphs 5.117-5.118, p.90)

Reference	Modification proposed	Part of the Plan
FMO22	<p><b>1. The Council will seek to meet the housing needs of Gypsy and Traveller communities over the plan period. This includes setting a ten-year target to deliver 39 pitches.</b></p> <p><del>2.</del> The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller Accommodation. <b>The enhancement and where feasible intensification and/or expansion of the site will be supported to contribute to meeting the ten-year pitch target.</b></p>	Policy H10, parts 1, 2, 3 & 4

<sup>2</sup> The Council referred to this being in the range 500 to 850 kg CO<sub>2</sub>/m<sup>2</sup>.

	<p><b>2-3.</b> Developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches <b>and transit sites and sites for negotiated stopping</b>, will be supported where they meet identified need.</p> <p><b>3- 4.</b> Developments that propose accommodation to meet these needs of Gypsies, Travellers and Travelling Showpeople should be located:</p> <ul style="list-style-type: none"> <li>a. outside of the Green Belt or Metropolitan Open Land, unless there are very special circumstances; and</li> <li>b. in flood zone 1 or exceptionally in flood zone 2, subject to meeting the requirements of Local Plan Policy CE7; and</li> <li>c. on sites that can provide the associated necessary (primarily physical) infrastructure requirements to service the needs of a development or wider site; and</li> <li>d. on land that provides safe access to the highway and should not result in any unacceptable impact on the capacity and environment of the highway network; and</li> <li>e. the site is in a sustainable location, appropriate for residential development and in reasonable proximity to relevant services and facilities, including transport, education, healthcare and other relevant social infrastructure provision.</li> </ul> <p>[Associated numbering updates]</p>							
FMO23	<p>3.195 The Planning Policy for Traveller Sites requires Local Planning Authorities to identify sufficient sites to meet any need identified for Gypsies and Travellers across their plan period. <del>Newham</del><b>London's</b> latest evidence of Gypsy and Traveller accommodation needs <del>found</del><b>indicates</b> a need for <del>2339</del> pitches in the borough <b>to 2037 (including backlog need from 2022), which breaks down as follows:-</b></p> <table border="1" data-bbox="392 1458 1110 1720"> <tr> <td></td> <td><b>Phase 1 (Short term)</b> <b>27/28 - 31/32</b></td> <td><b>Phase 2 (Medium term) 32/33 - 36/37</b></td> </tr> <tr> <td><b>Total need for each phase</b></td> <td><b>34 pitches</b></td> <td><b>5 pitches</b></td> </tr> </table> <p><del>We are also aware of emerging evidence of need being led at the regional level by the Greater London Authority, which will consider the need for pitches across London. We will seek to meet the need identified through our local and the emerging regional evidence base through the Council's Small Sites Options Appraisals and Modular construction programme.</del></p>		<b>Phase 1 (Short term)</b> <b>27/28 - 31/32</b>	<b>Phase 2 (Medium term) 32/33 - 36/37</b>	<b>Total need for each phase</b>	<b>34 pitches</b>	<b>5 pitches</b>	Policy H10 Justification text paragraph 3.195
	<b>Phase 1 (Short term)</b> <b>27/28 - 31/32</b>	<b>Phase 2 (Medium term) 32/33 - 36/37</b>						
<b>Total need for each phase</b>	<b>34 pitches</b>	<b>5 pitches</b>						

FMO131	<b>H10.1</b>	<b>This target will be monitored in accordance with the plan's monitoring framework.</b>	H10, Implementation text
	H10.32	Developments proposing accommodation to meet the needs of Gypsies, Travellers and Travelling Showpeople should demonstrate need for the accommodation being proposed. In most instances, evidence should refer to the findings of Newham's Gypsy and Traveller Accommodation Assessment <b>or London Gypsy and Traveller Accommodation Needs Assessment</b> , but additional details can be submitted alongside the application as necessary.	
[Associated policy numbering updates required throughout the policy]			
MO118	<del>No target.</del> <b>Target: 39 pitches by 2036/37</b>	<del>Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.</del>	Monitoring Framework (Row: Indicator 33; Column: Target and scope of monitoring)

**AP50.** Council to amend the potential modification to policy H10 to delete the changes to part 4 (because transit sites should be subject to the same flood risk policy as permanent sites).

**Council Response:**

7.2 Please see the below modifications to policy H10 which addresses the action point. This is also included in the Schedule of Proposed Modifications (ED020).

**3.4.** Developments that propose accommodation to meet these needs of Gypsies, Travellers and Travelling Showpeople should be located:

- a. outside of the Green Belt or Metropolitan Open Land, unless there are very special circumstances; and
- b. in flood zone 1 or exceptionally in flood zone 2, subject to meeting the requirements of Local Plan Policy CE7; and
- c. on sites that can provide the associated necessary (primarily physical) infrastructure requirements to service the needs of a development or wider site; and
- d. on land that provides safe access to the highway and should not result in any unacceptable impact on the capacity and environment of the highway network; and
- e. the site is in a sustainable location, appropriate for residential development and in reasonable proximity to relevant services and facilities, including transport, education, healthcare and other relevant social infrastructure provision.

**AP51.** Council to advise whether there is a reasonable prospect that any of the potentially suitable small sites in its ownership will be available to provide additional pitches in the plan period or, if not, why not.

**Council Response:**

7.3 The Council considers that it is not currently possible to determine whether any of the potentially suitable small sites within its ownership will be available to provide additional pitches during the plan period. This is because the corporate review of Council owned land is still ongoing. The Council anticipates that any additional sites required to meet the identified Gypsy and Traveller accommodation need are most likely to come forward as windfall opportunities once this exercise is complete. Council owned land is still ongoing. The Council anticipates that any additional sites required to meet the identified Gypsy and Traveller accommodation need are most likely to come forward as windfall opportunities once this exercise is complete.

7.4 The team structure for progressing the delivery of these sites is in place and will comprise a project manager with small sites development experience and procurement expertise. Initial desktop feasibility and risk analysis of the identified sites has begun. At this stage, the Council is not able to put forward any clear recommendations, as the sites have not yet been fully tested or costed. Any spend associated with the project will require a business case and governance decision, noting the context of the significant financial pressures the Council is currently facing. Each of the small sites identified also presents its own constraints that require further exploration. Key issues include:

- Flood risk: Consultants will need to be appointed to undertake sequential testing and other technical assessments to confirm whether sites are suitable. As sleeping accommodation is likely to be on the ground floor, any flood related risks must be fully understood and mitigated prior to a planning application. Flood risk is not considered a reason to remove sites from the programme at this stage; however, the necessary testing must be completed. Flood related risks must be fully understood and mitigated prior to a planning application. Flood risk is not considered a reason to remove sites from the programme at this stage; however, the necessary testing must be completed.
- Anti-social behaviour: One location has a significant history of ASB and is relatively isolated, with limited access to shops and services. It is essential to ensure that any proposed site is suitable and that the Council does not place the community in locations that are inappropriate for further development.
- Infrastructure and utilities risk: One site is adjacent to a railway line where a previous planning application was unsuccessful. This position needs to be reassessed in light of the height and massing now proposed. Given the scale of the potential developments, underground utility risks cannot be absorbed within scheme costs. Further utilities testing and title investigations are required to confirm whether sites can be delivered within a reasonable contingency budget.

7.5 The Council will continue to progress the corporate land review and the necessary technical assessments to establish whether any of the potentially suitable small sites can be brought forward. Once this work is complete, the Council will be in a position to identify whether these sites can contribute to meeting the Gypsy and Traveller accommodation need.

7.6 It is expected that any deliverable sites will come forward as windfall opportunities, supported by the Council's robust emerging Policy H10(3), which provides a clear framework for bringing forward windfall sites once the corporate exercise has concluded.

## Existing community facilities and health facilities

**AP52.** Council to prepare a potential modification to policy SI1 to:

- a) Delete reference to “reconfigured” in part 1.
- b) Amend part 2 to read “... the preferred type of development will be that which will deliver the maximum amount of affordable housing ...” (or similar).

### Council Response:

8.1 Please see below for the proposed modifications that address AP52. For clarity, Policy SI1 and its accompanying implementation text are reproduced in full and incorporate modifications set out in ED20, along with minor typographical corrections.

- MO46

### Policy SI1: Existing community facilities and health facilities

1. Existing facilities will be protected and should not be lost to other uses, ~~reconfigured~~, reduced in size or relocated unless it can be demonstrated that the following criteria are met:

a. The needs of the current users of the facility, potential or future users (where the facility is not in use) are met through:

- i. provision of a suitable on-site replacement facility; or
- ii. a suitable off-site replacement, within the local well-connected neighbourhood of the original facility; or
- iii. an existing local facility, within the local well-connected neighbourhood which is suitable, available and affordable; or

b. the existing 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 community or health social infrastructure** use for at least 12 months and it can be clearly shown there is no alternative social infrastructure use that could take on the space to meet the needs of the local neighbourhood; or
- iii. the proposal is part of a strategy from a recognised public sector body’s estates programme; and

c. a Social Value and Health Impact Assessment (see Local Plan Policy BFN3) is provided and demonstrates potential gains are maximised and any negative impacts can be mitigated.

2. If the loss of a facility can be demonstrated as being acceptable to the Council, ~~then~~ the preferred **type of development** ~~alternative use~~ will be **for that which delivers** the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location).

## Implementation

ALL	<p>For the purpose of this policy, community facilities are defined as:</p> <p>Community centre, meeting places (for the principle use of the local community) (F2 (b))          Youth facilities (Youth Zones, Youth Clubs) (F2 (b))          Social Clubs (Sui Generis)          Training centres and homework clubs (F1(a))          Libraries (F1 (d))          Public halls and exhibition halls (F1(e))          Bars and pubs* (Sui Generis)          Public toilets (Sui Generis)          Places of worship (F1 (f))          Civic uses (including criminal justice and court facilities) (Sui Generis or F1(g))          Emergency services (fire station, ambulance station and police station) (Sui Generis)</p> <p>Health facilities are defined as:          Clinics, health centres,          GP surgeries, medical services not attached to the residence of the practitioner, day centre (non-residential)* (E(e))          Hospitals* (C2)</p> <p>* Main town centre uses, as defined by the NPPF and London Plan (2021) 17 ONS 2022/21</p> <p><b>Policy SI1 does not apply to education uses and childcare facilities, these uses are addressed in Policy SI4.</b></p> <p><b>The following parts of Policy SI1 apply to cultural facilities and sport and recreation facilities, as set out in Policy SI3:</b></p> <ul style="list-style-type: none"> <li>● <b>Policy SI1 part 1.a</b></li> <li>● <b>Policy SI1 part 1.c</b></li> <li>● <b>Policy SI1 part 2</b></li> </ul>
SI1.1	<p>Applicants will need to be able to demonstrate that a <del>reconfigured or replacement</del> facility (either on or off-site) will meet the needs of the existing users, potential users (where the facility is not in use) and/or future users.</p> <p>Just because a facility is not in use currently does not mean that there is not a need for the facility and the services it could provide. This is why the policy requires applicants to consider the potential users of a facility, this includes where the building may be in disrepair, closed for an extended period of time or indeed demolished. The future users of a site may also need to be considered. These are people who will come to live in the new homes built over the Local Plan period (to <del>204238</del>).</p> <p><del>Reconfigured and replacement</del> Facilities should meet the criteria set out in Local Plan Policy SI2.7. A replacement facility will only be considered acceptable if the alternative setting provides the same or better functions as the site due to be lost. This should provide the required floor space and quality standard to be suitable for the intended users. A replacement facility must be a realistic substitution, capable of demonstrating adequate funding, site availability and timely delivery of facilities appropriate to its users.</p>

To demonstrate that a replacement facility is within the well-connected neighbourhood of the existing facility, development proposals must include the submission of up-to-date spatial mapping of the social infrastructure network, within 15 minutes of the site. This mapping exercise must identify the development site location in the context of the replacement facility location (including town centres) within a 15 minute walking distance (identified using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users) of the site. This will demonstrate the suitability of the location of the replacement site in relation to the existing facility. For an existing facility to be considered available it should have capacity to accommodate users at the times they wish to use the space.

For an existing facility to be considered affordable it should be available at the same cost as the previous space or average equivalent for a similar space in the local area.

Applicants are encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Evidence must be submitted to demonstrate that the site has no realistic prospect being used for social infrastructure in the foreseeable future. It is important to recognise that a lack of use should not be taken as necessarily indicating an absence of need in an area. An assessment is likely to require evidence of the following:

- 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.**
  - Applicants wishing to demonstrate that an existing community facility is not needed should consult Newham's Community Facilities Needs Assessment (2022). Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. The maps take into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.
  - Applicants wishing to demonstrate that an existing healthcare facility is not needed should show evidence of consulting the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU). The strategic delivery of NHS services is jointly formed from NHS organisations working in Newham, and is summarised within the [Joint Forward Plan](#). Please visit the [NHS North East London website](#) for the most up to date NHS strategy and plan information.

- the specific buildings or land being surplus to requirements.
- the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

	<ul style="list-style-type: none"> <li>· the development proposal is for an alternative social infrastructure use, the benefits of which clearly outweigh the loss of the former or current use.</li> <li>· recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</li> </ul> <p>Evidence that the facility has been actively marketed for social infrastructure use should include:</p> <ul style="list-style-type: none"> <li>· evidence that the site has been offered to the market for an appropriate lease arrangement and at a local market value suitable for the size, type and use, covering the full range of permitted uses; and</li> <li>· robust evidence that the marketing activity was active and continuous for a period of at least 12 months. Such marketing activity should make use of appropriate agencies, publications, websites and should be easily noticeable by the public and other interested parties; and</li> <li>· a record of all expressions of interest received with full reasons given as to why any offer was not accepted.</li> <li>· For community facilities, the sales price/rent should reflect rates generally paid by community groups or voluntary organisations for similar space in the local area and be agreed with Newham Council.</li> <li>· Evidence that consideration has been made to alternative methods of ownership, for example community or voluntary operation.</li> </ul> <p>There may be a need for public sector bodies to invest in modern, fit for purpose buildings and/or to reorganise the scale and locations of services to better meet future population needs or to sustain and improve services. Where the loss or reduction is from a recognised public sector body there is no need to undertake a marketing exercise.</p> <p>A Social Value and Health Impact Assessment (see Local Plan Policy BFN3) and a service strategy will need to be provided to demonstrate details of rationalisation, including that they have considered the needs of service users as part of any service delivery strategy. A recognised public sector body can include:</p> <ul style="list-style-type: none"> <li>· Hospital trusts and other health organisations.</li> <li>· The emergency services (Metropolitan Police Service, London Fire Brigade, London Ambulance).</li> <li>· Public sector organisations, such as the Council, who maintain a portfolio of community premises.</li> <li>· Higher education institutions.</li> </ul> <p>A Social Value Health Impact Assessment is needed to support any application for a loss, reduction, replacement, <del>reconfiguration</del> or relocation of a community facility.</p>
SI1.2	<p>Where it can be demonstrated that the loss of a community facility is acceptable, we will seek to see the delivery of <b>development that will support</b> the maximum viable amount of affordable housing. The value uplift from such a decision will allow schemes which see the loss of a community facility to deliver more than the standard 650 per cent affordable housing requirement (see Policy H3). We will not support residential development on the ground floor in Primary Shopping Areas (unless Policy HS2 criteria have been met), in Strategic Industrial Locations or Local Industrial Locations; these locations are protected for main town centre uses (see Policy HS2) and employment (see Policy J1) respectively.</p>

**AP53.** Council to prepare a potential modification to the reasoned justification and/or implementation text to clarify that policies SI1 and SI2 apply to cultural facilities and sport and recreation uses (as well as policy SI3) but not education and childcare uses (policy SI4).

**Council Response:**

8.2 Please see the proposed modification in response to AP52 above, which addresses modifications to Policy SI1 to improve clarity of policy application.

8.3 Please also see the proposed modification below, in response to AP54 which addresses the required modification to Policy S2 and SI3 to improve clarity of policy application.

**New and improved community facilities and health facilities**

**AP54.** Council to prepare a potential modification to the parts of policy SI2 that refer to demonstrating “unmet demand” and not supporting “speculative development” to set out a positive approach to the design and layout of new or improved social infrastructure that takes account of the type of uses to be accommodated and the expected needs of future occupants.

**Council Response:**

9.1 Please see below for proposed modifications to Policy SI2 and Policy SI3.

9.2 For clarity, Policy SI2 and its accompanying implementation text are reproduced in full and incorporate modifications set out in ED20.

- MO47
- FMO91
- FMO92

9.3 For consistency and clarity, the Council proposes extending the approach established in AP54 to Policy SI3 – to set out a positive approach to new or improved social infrastructure. In addition, modifications are proposed to enhance policy alignment and to clarify the interrelationship between Policies SI1 and SI2, as prompted by AP52 and AP53.

**Policy SI2: 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 **or re-provided** community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery; and

b. the delivery of new **or re-provided** 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.~~

**c. supporting proposals for new or re-provided facilities where it is demonstrated that:**

- i. the design, layout and scale of the facility appropriately reflect the role of the space, the types of uses to be accommodated, and the needs of existing**

**and/or future users; and**

**ii. these needs cannot be adequately met through planned provision on identified site allocations.**

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 proposed facility is located in a town or local centre; or
- d. if the facility is a main town centre use, 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. in a 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. Speculative social infrastructure development will not be supported.~~

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

56. 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.

67. 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. demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space; and

- c. make efficient and effective use of land, maximising the opportunities for shared use of facilities; and
- d. ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and
- e. be visible and welcoming from the street and be designed to facilitate social interaction; and
- f. be inclusive and accessible; and
- g. be designed with flexibility in mind, to allow the building to adapt to different users of the space over time; and
- h. 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. maximise availability of their provision to the community, including during the evening and at weekends; and
- j. 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. demonstrate that the scheme has been designed to be neighbourly.~~

78. 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

## Implementation

ALL	<p><b>Policy SI2 does not apply to education uses and childcare facilities, these uses are addressed in Policy SI4.</b></p> <p><b>New and re-provided culture, sport and recreation facilities should meet the criteria set out in Local Plan Policy SI2.</b></p>
SI1.1	<p>The Local Plan neighbourhood policies and relevant site allocations set out where future community facilities are required, reflecting the need to meet a known deficit in provision.</p> <p>A neighbourhood is considered to be in an area experiencing a community facility deficit if it met one of the following criteria in the Community Facilities Needs Assessment (2022):</p> <ul style="list-style-type: none"> <li>• Local Plan Neighbourhoods with facilities below the average Newham provision of 10.8 Facilities/Km<sup>2</sup>,</li> <li>• Local Plan Neighbourhoods within Community Neighbourhoods with below the borough average provision per 1,000 head of population,</li> <li>• Local Plan Neighbourhoods within Community Neighbourhoods with the borough average provision per 1,000 head of population and where high growth is anticipated,</li> <li>• Local Plan Neighbourhoods within Community Neighbourhoods with above the borough average provision per 1,000 head of population and where high growth is anticipated.</li> </ul> <p>Where the need for a community facility has been identified on a site allocation, applicants should deliver the use in accordance with Policy SI2, unless it can be demonstrated that the needs of the community have already been met. Applicants need to consider what type of facility is needed and when it is required to be operational. Development should consider the need for all types of facility, as set out in the Community Facilities Needs Assessment (2022) evidence base.</p>

The Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational.

Applicants should speak with the council early in the application process to understand what evidence is required to support a needs-based assessment for a facility.

A needs-based assessment is likely to require evidence of the following:

- 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.
- applicants for a community facility proposal should consult Newham's Community Facilities Needs Assessment (2022) to ascertain the current provision of community 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. Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. The mapping in the Community Facilities Needs Assessment (2022) takes into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.
- 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.

**Where new facilities are proposed outside of planned provision on site allocations, the Council is likely to require evidence of the following:**

#### **All facilities**

- **up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods, as set out above.**
- **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.**

#### **Community facilities**

- **having consulted Newham's Community Facilities Needs Assessment (2022) to ascertain the current provision of community facilities in the borough and whether or not the site is in an area of deficit, as set out above.**

#### **Health facilities**

- **evidence of consulting the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU). The strategic delivery of NHS services is jointly formed from NHS organisations working in**

	<p>Newham, and is summarised within the <a href="#">Joint Forward Plan</a>. Please visit the <a href="#">NHS North East London website</a> for the most up to date NHS strategy and plan information.</p> <p><b>Cultural, sport and recreation facilities</b></p> <ul style="list-style-type: none"> <li>• Please see Policy SI3 part 2.</li> </ul> <p><b>These steps are important because provision of unnecessary space or facilities which do not properly consider the end user(s) can lead to the delivery of unviable or unusable space. It can also mean that opportunities for other development, not least housing, is lost.</b></p>
SI2.2	<p>It is recognised that some facilities naturally serve a catchment outside of a local neighbourhood or indeed the borough boundary. Social infrastructure with wider catchment areas, which can attract higher number of trips, may not be suitable in residential areas due to increased traffic, noise and large numbers of people coming and going. Larger facilities and those attracting users from beyond the local neighbourhood are therefore best located in Newham’s Town or Local Centres.</p> <p>Larger and more visited facilities should be accessible by a range of sustainable transport modes; as such, they should be directed to transport hubs, major thoroughfares and locations in close proximity to bus stops. It is important that applications for social infrastructure facilities consider how both users and staff will travel to and from them. For the purposes of this policy:</p> <ul style="list-style-type: none"> <li>• a local neighbourhood is defined as a 15 minute walking, wheeling or cycling distance buffer around the site, taking into account the street network and pedestrian barriers.</li> <li>• The definition of a large number of trips will vary depending on the type of facility being considered. When deciding if a scheme will generate a large number of trips we will consider the type and frequency of movement, the pattern throughout the day and over the course of the week.</li> </ul> <p>Applicants should provide a Full Travel Plan to allow proper assessment of any transport impacts (see Local Plan Policy T3).</p> <p>Town centres and local centres are defined on Newham’s policies map and are set out in Local Plan Policy HS1.</p> <p>A sequential test, <b>proportional to the size and nature of the facility</b>, must be submitted as part of any application for planning permission for the development of a <b>facility main town centre use (as defined by the NPPF and London Plan (2021) Policy SD7)</b> that is not in a designated town or local centre. Applicants are advised to liaise with the council prior to the submission of an application to agree a suitable approach in respect of the application submission requirements.</p> <p>In undertaking the sequential test, applicants should clearly set out a series of site search thresholds, including the site size (having regard to the proposal), matters such as accessibility, visibility and location. It is important to set out the geographic area from which the proposal will likely draw its users. It is from this ‘catchment area’ that the search for potential sequential opportunities can be concentrated, focusing on defined centres within that identified catchment.</p> <p>If an edge of centre or out of centre location is proposed, preference should be given to accessible sites that are well connected to a town centre.</p> <p>Only if suitable sites in the town centre, local centre or edge of centre locations are not available (or are not expected to become available within a reasonable period) should out of centre sites be considered.</p>

	<p>If the applicant or the Council is able to identify an alternative site which is considered to be both available and suitable, and no robust justification can be provided as to why this site could not accommodate the development proposed, it is likely that planning permission for the original scheme will be refused.</p> <p>Where a main town centre sport or recreation use, or a bar or pub of more than 300sqm GIA is proposed, either through extension or new provision, outside of or on the edge of a defined centre an impact assessment will be required. It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission.</p> <p>An impact assessment should follow the latest government guidance and should be proportionate to the scale and potential impact of the proposal. The purpose of an impact assessment is to consider the impacts of the proposal on town centre vitality and viability and investment (see Local Plan Policies HS1, HS2 and HS3).</p> <p>It is for the applicant to demonstrate that the proposal will not have a significant adverse impact on planned and committed town centre investment, or on the vitality and viability of the defined centres. The assessment should consider all town centres which may be affected, not just those located closest to the application site.</p> <p>Applicants are strongly encouraged to take advantage of the Council’s pre-application advice service to agree the scope of an impact assessment where one is required. Please note that the onus would be on the applicant to provide a framework impact assessment listing the points/information to be covered for comment.</p> <p>Where the test is passed, the facility use will be secured to ensure that the facility continues to serve a local function and does not lead to unintended character change.</p>
SI2.4	<p><del>Where new community facilities are proposed, the Council’s Resident, Engagement and Participation team should be consulted to understand the need for such a space.</del></p> <p><del>The applicant should also consult Newham’s Community Facilities Needs Assessment (2022) to understand existing provision in the area and engage with the local community.</del></p> <p><del>Where new health facilities are proposed, applicants should show evidence of consulting the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU). The strategic delivery of NHS services is jointly formed from NHS organisations working in Newham, and is summarised within the <a href="#">Joint Forward Plan</a>. Please visit the <a href="#">NHS North East London website</a> for the most up to date NHS strategy and plan information.</del></p> <p><del>Where new sport and recreation facilities are proposed, applicants should show evidence of consulting Newham’s Built Leisure Needs Assessment (2025) (2024) to understand existing provision in the area and engage with the local community and Sport England.</del></p> <p><del>These steps are important because provision of unnecessary space or facilities which do not properly consider the end user(s) can lead to the delivery of unviable or unusable space. It can also mean that opportunities for other development, not least housing, is lost.</del></p>

### Policy 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 relocated unless it can be demonstrated that:
  - a. the criteria in Local Plan Policy SI1 **part 1.a and part 1.c**; 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; **or**
    - iii. **the proposal is part of a strategy from a recognised public sector body’s estates programme; and**
  - c. the criteria in Local Plan Policy SI1. ~~part 2~~ 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 **cultural**, sport and recreation facilities will be achieved through:
  - a. 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; **and**
  - b. supporting proposals for new or re-provided facilities where it is demonstrated that:**
    - i. the design, layout and scale of the facility appropriately reflect the role of the space, the types of uses to be accommodated, and the needs of existing and/or future users; and**
    - ii. these needs cannot be adequately met through planned provision on identified site allocations.**
3. New and **re-provided** ~~reconfigured~~ culture, sport and recreation facilities should meet the criteria set out in Local Plan Policy SI2.

### Implementation

ALL	<p>For the purpose of this policy cultural facilities are defined as:          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:          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> <p><b>In addition to Policy SI3, new and re-provided culture, sport and recreation facilities should meet the criteria set out in:</b></p> <ul style="list-style-type: none"> <li>• <b>Policy SI1 part 1.a</b></li> <li>• <b>Policy SI1 part 1.c</b></li> <li>• <b>Policy SI1 part 2</b></li> <li>• <b>Policy SI2</b></li> </ul>
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<p>SI3.1</p>	<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), <a href="#">We Are Cultural (2022)</a> and the Built Leisure Needs Assessment <b>(2025)</b> <del>(2024)</del> to understand existing provision in the borough and if the proposal site falls in an area of deficit.</p> <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 re-configuration, 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 <b>(2025)</b> <del>(2024)</del> and Sports Facility Calculator (Sport England).</p> <p>Sport England’s <a href="#">Planning for Sport Guidance</a> (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>
<p>SI3.2</p>	<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 <b>(2025)</b> <del>(2024)</del>.</p> <p>Where the need for a sort 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. 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"> <li>• 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 <del>of</del> 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.</li> <li>• Applicants should consult Newham’s Built Leisure Needs Assessment <b>(2025)</b> <del>(2024)</del> 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.</li> <li>• 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.</li> </ul> <p><b>Where new facilities are proposed outside of planned provision on site allocations, the Council is likely to require evidence of the following:</b></p>

	<p><b>All facilities</b></p> <ul style="list-style-type: none"> <li>• up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods, as set out above.</li> <li>• 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.</li> </ul> <p><b>Sport and recreation facilities</b></p> <ul style="list-style-type: none"> <li>• Where new sport and recreation facilities are proposed outside of planned provision on site allocations, applicants should show evidence of consulting Newham’s Built Leisure Needs Assessment (2025) to understand existing provision in the area and engage with the local community and Sport England.</li> </ul> <p><b>These steps are important because provision of unnecessary space or facilities which do not properly consider the end user(s) can lead to the delivery of unviable or unusable space. It can also mean that opportunities for other development, not least housing, is lost.</b></p>
S13.3	<p>Applications for <b>new and re-provided</b> <del>the enhancement of existing</del> cultural and sport and recreation facilities and <del>provision of new facilities</del> will be supported, subject to meeting the criteria of Local Plan Policy S12.</p> <p>Applicants wishing to bring forward a new or <b>re-provided</b> <del>reconfigure</del> cultural facility should first consult Newham’s Community Facilities Needs Assessment (2022) and Newham’s Culture Strategy, <a href="#">We Are Cultural (2022)</a>.</p> <p>Applicants wishing to bring forward a new or <b>re-provided</b> <del>reconfigured</del> sport or recreation facility should first consult the Built Leisure Needs Assessment <b>(2025)</b> <del>(2024)</del> 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 and main town centre uses <del>such as and community centres</del>. 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 S12 provides guidance on the development of new or re-provided cultural and sport and recreation facilities <del>(including modernisation and/or expansion)</del>.</p> <p>Local Plan Policy BFN3 provides guidance on undertaking a Social Value-Health Impact Assessment.</p>

## Education and childcare facilities

**AP55.** Council to prepare a potential modification to policy SI4 parts 3b and 3c and/or the implementation text to clarify the requirements for applicants relating to securing a long option to deliver the facility and ensuring a design that will allow the facility to grow incrementally.

### Council Response:

10.1 Please see below for the proposed modifications that address AP52, a modification to address AP53, along with minor typographical corrections.

#### Policy SI4: Education and childcare facilities

3. The ~~timely~~ ~~appropriately timed~~ delivery of new educational facilities to meet changing pupil place needs will be secured through:
- a. **aligning delivery with development phasing, to ensure ensuring the education facilities come forward at the point they are needed to meet pupil place demand is delivered in the appropriate phase of development;**
  - b. securing the long-term option to deliver an education facility on specified site allocations, **through an agreed legal mechanism, to bring forward the facility at the required point in the Plan period;** and
  - c. requiring a flexible, **future-proofed** design ~~so the facility can grow incrementally as pupil numbers increase~~ **that enables the layout, structure, servicing and access to be expanded over time without compromising operational requirements or outdoor space.**

### Implementation

<b>ALL</b>	<b>Education and childcare facilities are required to comply with Local Plan Policy SI4 only, and are not subject to Policies SI1, SI2 or SI3.</b>										
SI4.1	<p>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.</p> <p>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.</p> <p><del>The site allocations that address Newham's future need to 2038 are:</del> <b>Table 6: Site allocations that address Newham's future education and childcare needs to 2038</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Site allocation and Neighbourhood</th> <th style="text-align: center;">Ward</th> <th style="text-align: center;">School Place Area</th> <th style="text-align: center;">Education Facility</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			Site allocation and Neighbourhood	Ward	School Place Area	Education Facility				
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
<del>N11.SA3 Royal</del> <b>N4.SA4 Royal Road,</b> 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

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.

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.

Local Plan Policy J4.2 requires delivery of childcare facilities where there is a need.

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>SI4.3</p>	<p>The <b>Newham’s</b> Places for All document (London Borough of Newham (2022) and the annual <a href="#">Childcare Sufficiency Assessment (London Borough of Newham)</a> will likely reflect <b>changing levels of demand for early years and school places as they are revised over the Plan period</b> 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 <b>respond effectively to</b> meet fluctuating pupil place needs.</p> <p><del>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.</del> <b>The phasing of education facilities must be timely and coherent, with delivery occurring at the appropriate stage of development in line with anticipated pupil demand. Ensuring that education provision is brought forward at the right time is essential to prevent shortfalls in school places or unnecessary over-provision.</b></p> <p><del>Additionally, the delivery of new education facilities on identified site allocations should provide a long term option, up to 204238, to bring forward the facility, to allow for changes in the pupil place planning profile.</del></p> <p><b>Site allocations identified for future education provision must remain available for delivery of new facilities over the Plan period, ensuring that capacity can be brought forward in response to fluctuations in pupil place demand.</b></p> <p><del>Where the school is expected to come forward will only be needed in the latter part of the Plan period, suitable then appropriate meanwhile uses should be identified determined for the site. Such uses should be defined in the scheme’s</del> <b>These uses should be set out in the schemes</b> Meanwhile Use Strategy and <b>must be consistent with Policy</b> in accordance with BFN1.</p> <p>In terms of design, new proposals for educational facilities should have regard to the design standards of the <a href="#">Area Guidelines for Mainstream Schools (Department for Education (2014))</a> and <a href="#">Active Design (Sport England ((2015))</a>. <b>To ensure that new schools have the ability to expand in response to fluctuating pupil place needs, applicants should demonstrate that the design of the facility allows for phased or modular growth. This may include identifying safeguarded expansion zones, ensuring structural and servicing capacity for future phases, providing adaptable circulation and access, and setting out how high quality open space will be retained. The Design and Access Statement should illustrate how expansion can take place with minimal disruption to the functioning of the school and surrounding uses, while maintaining the high-quality learning environment required by SI5.5.-quality open space will be retained. The Design and Access Statement should illustrate how expansion can take place with minimal disruption to the functioning of the school and surrounding uses, while maintaining the high-quality learning environment required by SI5.5.</b>  <del>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.</del></p>
<p>SI4.5</p>	<p><del>In</del> Education <b>facilities sites</b> 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, <a href="#">Using Green Infrastructure to Protect People from Air Pollution (2019)</a>, 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 <b>requirements should</b> <del>shall</del> 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)). <del>The travel plan should also</del> <b>It should clearly demonstrate how the proposal will support active travel and mitigate transport impacts, including measures to address potential impacts on road congestion, on surrounding roads – particularly specifically in cases where the site is located within or adjacent to a residential area, will be addressed.</b> See Local Plan Policy T3 for further travel plan guidance.</p> <p><del>Developments for schools and childcare facilities only need to fulfil the requirements of Local Plan Policy SI4 as opposed to all SI policies.</del></p>
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## Green Space

**AP56.** Council to prepare potential changes to the policies map to reflect the changes to green space set out in ED20, with the exception of the reduction in the designation at West Ham Park (nursery site).

### Council Response:

11.1 This [GIS webapp link](#) is where you can view the amended policies map. *(To turn the layers on or off, in the top right-hand corner of the interactive map, you will see two icons. Please select the 'Map Layers' icon, this will list all the designations shown on the map. To turn the designations on or off please select the 'eye' icon next to each layer)*

## Water spaces

**AP57.** Council to consider whether policy GWS2, and the proposed modification, needs to be amended to ensure consistency with London Plan policy SI17 part D and paragraph 9.17.2 including in relation to permanently moored vessels in Newham’s docks.

### Council Response:

12.1 Please see below for the proposed modifications that address AP57. For clarity, Policy GWS2 and its accompanying implementation text are reproduced in full and incorporate modifications set out in ED20, along with minor corrections.

- MO75.1
- MO75.2
- MO75.3
- MO75.4
- MO77
- FMO25

**Policy GWS2: Water spaces**

2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including **undeveloped areas of riparian buffer zone**, riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:

- a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and
- b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy **(2025)** ~~(2024)~~; including the requirements in the neighbourhood policies and site allocations; and
- 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**

~~e.~~ **d. generally** requiring no **encroachment** ~~loss~~ or covering of any water space unless it is a ~~water-related or water-dependent use~~ **for development proposals into the waterways, including permanently moored vessels, for water-related uses or to support enhancements of water-related uses. Development proposals to impound or narrow water spaces will not be supported;** and;

~~d.~~ **e.** ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and

~~e.~~ **f.** maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and

~~f.~~ **g.** protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and

~~g.~~ **h.** providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and

~~h.~~ **i.** contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and

~~i.~~ **j.** improving the safety and public use of the borough's water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.

3. Applications for water-related or water-dependent facilities on or adjacent to water spaces will be supported where:

- a. it can be demonstrated there is a deficit in provision for such water-dependent uses locally; and

- b. it can be demonstrated that the activation of the water space is appropriately scaled and located and does not negatively impact on navigation, **flood risk**, ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents.
4. Applications for residential and visitor moorings will supported, outside of Strategic Industrial Locations and Local Industrial Locations, where:
- a. supporting uses and facilities are or will be in place (see Local Plan Policy CE6); and
  - b. it can be demonstrated that residential and visitor moorings are appropriately located, **accessible**, and do not negatively impact on navigation, **flood risk, ecological value**, water quality, the openness and character of the water space and the amenity of surrounding residents.

### Implementation

GWS2.1	<p>Development should be compliant with the Water Framework Directive and should seek to enhance the river or estuary habitat and hydromorphology, delivering Water Framework Directive actions and Thames River Basin Management Plan objectives. It is important to note that all in land waterbodies are protected under the Water Framework Directive not just main rivers.</p> <p>Early engagement, with appropriate key stakeholders is encouraged. Timely engagement is important, it helps to ensure proposed developments align with wider priorities and these strategies. Development proposals in proximity to water space should incorporate work with the Council and our partners (including the Port of London Authority, the Canal and River Trust, Royal Docks Management Authority (RoDMA), the London Lea Catchment Partnership, Beam and Ingrebourne Catchment Partnership, <b>the GLA</b> and the Environment Agency), landowners and the community.</p>
GWS2.2	<p>All development affecting water space should set out the components of good design within a Design and Access Statement. For major development, this is also required for proposals adjacent to water.</p> <p>The Green and Water Strategy (2024) <del>sets out</del> <b>identifies</b> opportunities to <del>improve</del> <b>enhance</b> Newham’s water space. The Plan’s neighbourhood policies and site allocations give further details of where and how water space and access to it can be enhanced. <b>The delivery of these sites will be shaped through co-designed masterplanning in accordance with Policy BFN2. Alternative approaches to improving the functionality, connectivity, quality, and accessibility of existing water spaces may be acceptable, where clear, robust justification is provided and the approach delivers outcomes consistent with the allocation, and other policies in the Local Plan.</b></p> <p>Development must consider the following, to ensure high-quality water spaces are delivered:</p> <p><b>Functionality</b></p> <ul style="list-style-type: none"> <li>• Development adjacent to water space should recognise and conserve its importance as a valuable social, environmental, and economic resource. Where heritage assets are present, design should pay special regard to their setting.</li> </ul> <p><b>Connectivity</b></p>

- Development should contribute to a cohesive approach to movement (especially for pedestrians and cyclists)
- The proposal should integrate positively with wider connections and minimise or reduce barriers to movement
- River re-naturalisation will be encouraged (see Local Plan Policy CE7), wherever feasible, design measures can include, but are not limited to:
  - replacing hard engineering alongside and within river channels with soft engineering options where feasible
  - reconnecting rivers with their floodplains for flood risk reduction and resilience against climate change as well as habitat enhancement.
  - de-culverting river channels, unless it can be demonstrated it is not possible. Mitigation will be sought for any hard `engineering solutions applied to any river channels to compensate for any loss of habitat (including buffer zones)
  - including flood tolerant trees, bushes/shrubs and other plants. These should be trees and plants capable of lessening the impact of surface flood water, ideally with deep roots (dependant on the proximity to buildings)

### Quality

To ensure high quality design, development proposals should:

- maintain or enhance the quality of water space on or adjacent to the site, for example through plant species in the water or by ensuring that no waste or pollution enters it.

### Accessibility

To improve physical access development should:

- Maximise opportunities to improve public access to and along the borough's water spaces, particularly where access is currently restricted. This will be sought around the three docks (Royal Albert, Royal Victoria, and King George V), the River Lea, the River Roding, and the River Thames (e.g., the Thames Path and Capital Ring). See Local Plan neighbourhood proposals and site allocations for further details of area specific improvements.
- Provide a clear strategy for pedestrian movement within the proposal to give easy access to the water and associated amenities. This should include for children, older people and those with reduced mobility, e.g. seating, cycle storage, refuse bins, access steps and ramps.

### Loss Encroachment and covering

- Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in **the encroachment loss-or covering of water space unless for a water-related or water-dependent uses.**

**Water-dependent uses are activities that must be located on the water to function, drawing directly on the unique qualities of Newham's rivers and docks enabling people to experience, enjoy and engage with the water. These activities may take place on land immediately adjoining the water or on permanently moored vessels where their operation relies on a water-based setting. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft.-dependent uses are activities that must be located on the water to function, drawing directly on the unique qualities of Newham's rivers and docks enabling people to experience, enjoy and**

**engage with the water. These activities may take place on land immediately adjoining the water or on permanently moored vessels where their operation relies on a water-based setting.**

**Ancillary water-related or water-dependant uses, are activities that enhance water-dependent uses or help people access, appreciate and celebrate Newham's water spaces. These may include cultural, sport, leisure or recreation facilities that 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.**

**There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. ~~and demonstrate that it will not compromise the suitability of the water space for water-related uses.~~ -dependent uses or help people access, appreciate and celebrate Newham's water spaces. These may include**

#### **Openness**

- Proposals should ensure no negative impacts on the characteristics of views, tranquillity, and openness of the water body.

#### **Biodiversity**

- Schemes should maximise opportunities to incorporate existing habitats and vegetation.
- **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.**
- Planting should include only species suited to the on-site conditions (types and maturities) and be managed appropriately to achieve maximum benefit for biodiversity and river health. Invasive non-native species must be avoided, and where possible, reduced.
- External lighting should be designed to minimise light pollution and disruption to habitats and species. Low-level LED lighting with warmer colour temperatures with peak wavelengths greater than 550nm (~3000°K) should be used as these have been shown to cause less impacts on bats.

#### **Flood risk and set backs**

- development affecting and /or adjacent to the water should, where possible, include green spaces and Sustainable Urban Drainage Systems and look to enhance the water environment and preserve buffer zones (see Local Plan Policies CE7 and CE8).
- The edges of water space are an extremely important part of the functioning of water space as ecosystems, green space, and transport networks. There should be a minimum of an eight metre buffer zone for all freshwater courses. This is measured from the bank top and is needed to provide an effective and valuable river corridor and improved habitat connectivity.
- There should be no new or additional hardstanding or structures installed within the eight metre buffer zone. A 16 metre buffer should be in place for intertidal waters.
- Any development within 16 metres of the tidal Thames, Lea or Roding should follow the design principals of [Estuary Edges](#) to deliver ecological design for

	<p>softening these ‘edges’ to encourage wildlife into urban estuaries. Around ponds a buffer of 5 metre should be in place to help preserve their value for wildlife.</p> <p><b>Safety</b></p> <ul style="list-style-type: none"> <li>• The proposal should promote passive surveillance and should have a positive impact on perceptions of safety at night, for example by opening up or preserving sight-lines, or illuminating previously dark spaces.</li> <li>• Railings and barriers should be sufficiently designed to mitigate the risk of collision and falling into the water, in a manner that is appropriate to the water’s edge of which they form a part. Any necessary barriers should be designed in an integrated way, so that they don’t visually dominate or reduce perceptions of how the water is accessed.</li> <li>• Development in proximity to water space should consider appropriate suicide prevention measures, such as appropriate fencing, signage and/or CCTV, to further improve the safety of the borough’s water spaces. The PLA <a href="#">Drowning Prevention Strategy (2019)</a> provides practical steps to be taken to improve water safety.</li> </ul>
GWS2.3	<p>Water spaces provide significant habitats for wildlife, as well as a unique visual amenity which gives many parts of Newham a specific identity. There are also opportunities for leisure use and recreation activities both on and around the water. The balance of these uses will be managed by directing an appropriate intensity and type of activation to the right water space locations.</p> <p>Development proposal should respond to a clearly identified local need, make a positive contribution to the water body and respond positively to adjacent land uses.</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.</p> <p>The Built Leisure Needs Assessment <b>(2025) (2024)</b> provides an understanding of water-related leisure activities in Newham and the need for these uses over the Local Plan period. <b>Water related or water-dependent 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-dependent facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</b></p>
GWS2.4	<p>We will work in partnership with the Port of London Authority and the Canal and River Trust, RoDMA, the Environment Agency, <b>the GLA</b> and other appropriate authorities and stakeholders, to determine the suitability of residential and visitor moorings. In coming to a decision, we will with consider:</p> <ul style="list-style-type: none"> <li>• Navigation,</li> <li>• Water quality,</li> <li>• Biodiversity,</li> <li>• Openness and character of the water space and surrounding area,</li> <li>• Surrounding residential amenity,</li> <li>• The adequate provision of supporting uses and facilities, including: <ul style="list-style-type: none"> <li>○ Waste management (for example rubbish and sewage disposal)</li> <li>○ Supply of adequate electricity including for heating (see Local Plan Policy CE6)</li> <li>○ Supply of fresh water</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ <b>Provide access which meets the needs of all, with consideration given to children, older people and those with reduced mobility.</b></li> </ul>
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**AP58.** Council to prepare potential modifications to policies N1, N2 and N3 to provide an effective approach relevant to each neighbourhood in relation to permanently moored vessels in Newham’s docks consistent with London Plan policy SI17 part D and paragraph 9.17.2

**Council Response:**

13.1 The Council propose the following additional modifications to policies N1, N2 and N3 to provide an effective approach relevant to each neighbourhood in relation to permanently moored vessels in Newham’s docks consistent with London Plan policy.

13.2 These modifications build on the modifications which were previously agreed in the Council’s Statement of Common Ground with the Royal Docks Team [SOCG007] as being a suitable approach to the enhancement of Newham’s docks. These are also included in the Schedule of Proposed Modifications (ED020).

- MO92.1
- MO92.2
- MO92.3

[N1: North Woolwich]

**maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Development should celebrate the unique character of the docks and enhance the environmental quality of the waterscape. Suitably located and scaled waterfront amenities, including permanently moored vessels, that are water-dependent, water-related and that facilitate or enhance water-dependent or water-related uses, will be supported.**

[Associated numbering updates]

[N2: Royal Victoria]

**maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing these water spaces and access to them. Development should celebrate the unique character of the docks and enhance the environmental quality of the waterscape. Suitably located and scaled waterfront amenities, including permanently moored vessels, that are water-dependent, water-related and that support or enhance water-dependent or water-related uses, will be supported.**

[Associated numbering updates]

[N3: Royal Albert North]

**maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Development should celebrate the**

**unique character of the docks and enhance the environmental quality of the waterscape suitably located and scaled waterfront amenities, including permanently moored vessels, that are water-dependent, water-related and that support or enhance water-dependent or water-related uses, will be supported.**

[Associated numbering updates]

## Waste management

**AP59.** Council to prepare potential changes to the submission policies map to remove the “waste sites identified in the evidence base for the new joint waste plan”

### Council Response:

14.1 The policies map has been amended to remove this mapping layer. This [GIS webapp link](#) is where you can view the amended policies map. *(To turn the layers on or off, in the top right-hand corner of the interactive map, you will see two icons. Please select the 'Map Layers' icon, this will list all the designations shown on the map. To turn the designations on or off please select the 'eye' icon next to each layer)*

**AP60.** Council to consider whether policy W1 should be deleted in its entirety to avoid duplication and/or inconsistency with the East London Joint Waste Plan when that is adopted<sup>3</sup>. Alternatively, Council to prepare a potential modification to part 3 to clarify that it will apply only to waste sites safeguarded in the East London Joint Waste Plan when that is adopted.

### Council Response:

14.2 The following proposed modifications would avoid duplication and/or inconsistency with the East London Joint Waste Plan when that is adopted. Note this also includes some text in policy W2, which will be addressed through the update of the Joint Waste Plan. These are also included in the Schedule of Proposed Modifications (ED020).

Reference	Modification proposed	Part of the Plan
FMO132	<p>Working in tandem with the Joint Waste Plan update, the policies <del>safeguard existing waste sites and encourage the delivery and</del> improvement of waste site <b>operations</b>.</p> <p>[...]</p> <p>This section contains the following policies:</p> <ul style="list-style-type: none"> <li>● <del>W1: Waste management capacity</del></li> <li>● <b>W12:</b> New or improved waste sites</li> <li>● <del>W23:</del> Waste management in developments</li> <li>● <b>W34:</b> Utilities and digital connectivity infrastructure</li> </ul>	Waste and Utilities Introductory text

<sup>3</sup> The Council advised that the joint waste plan, which will supersede the joint plan adopted in 2012, was submitted for examination in January 2026.

FMO133	<p>Delete Policy W1 in full</p> <p>Delete references to Policy W1 throughout the plan</p> <p>Update other policy numbering as follows throughout the plan as follows:</p> <ul style="list-style-type: none"> <li>• W12: New or improved waste sites</li> <li>• W23: Waste management in developments</li> <li>• W34: Utilities and digital connectivity infrastructure</li> </ul>	W1: Waste Management Capacity
FMO134	<p>Delete parts 1 and 2 of Policy W2</p> <p>Update policy part numbering throughout the policy.</p>	W2: New or improved waste sites
FMO135	<p><del>3.355 Policy W2 seeks to ensure that new, replacement or intensified waste sites support the circular economy and reduce environmental and amenity impacts associated with their use. The policy seeks to incorporate flexibility into the assessment of new waste management uses, recognising the evolving nature of both waste management practices and national and regional policies that may result in a need for retrofit or the delivery of new waste sites in the borough. The criteria outlined within the policy will help to ensure that waste sites are located in sustainable locations, both in terms of amenity impacts and proximity to the sources of waste. Similarly, the policy seeks to reduce heavy goods vehicle movements where sites have the capability to support rail and water transport of waste, recognising that much of the borough's industrial land is located next to the River Thames, the River Lea and the River Roding.</del></p> <p>3.356 The policy also sets out requirements for waste sites to provide waste operator management plans, to avoid amenity impacts associated with waste uses.</p>	W2 Justification text 3.355-3.356
FMO136	Delete the implementation text for parts 1 and 2 of Policy W2.	Implementation text W2.1 and W2.2
FMO137	<p>Local Plan:</p> <ul style="list-style-type: none"> <li>• D6: Neighbourliness</li> <li><del>• W1: Waste management capacity</del></li> <li><del>• J2: New employment floorspace</del></li> </ul> <p>London Plan 2021 Policies:</p> <ul style="list-style-type: none"> <li><del>• S17: Reducing waste and supporting the circular economy</del></li> <li>• S18: Waste capacity and net waste self-sufficiency</li> <li><del>• S19: Safeguarded waste sites</del></li> </ul>	Policy W2 Policy links section
FMO138	<p>Local Plan:</p> <ul style="list-style-type: none"> <li><del>• W1: Waste management capacity</del></li> </ul>	Policy W3 Policy links section
FMO139	Delete 'Waste Hierarchy' and 'Waste sites' definition from the Glossary	Glossary

FMO143	Delete monitoring Key Performance Indicators 57, 58 and 59	Monitoring Framework
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## London City Airport

**AP61.** Council to prepare a potential modification to implementation text T5.2 so that the last paragraph reads: “The following changes in the use and function of the airport are likely to have particularly significant impacts and will therefore require robust evidence to allow thorough assessment of those impacts and determine whether effective mitigation measures can be secured that fully meet their external and environmental costs (or similar) ... [three bullet points as in submitted Plan].

### Council Response:

15.1 The Council has drafted a potential modification following this action point. The glossary will also be updated to make clear what the Council defines as night flights. This is also included in the Schedule of Proposed Modifications (ED020).

#### Implementation text Policy T5 part 2

~~It is considered that the following changes in the use and function of the airport would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes:~~

**The following changes in the use and function of the airport are likely to have particularly significant impacts and will therefore require robust evidence to allow thorough assessment of those impacts and determine whether effective mitigation measures can be secured that fully meet their external and environmental costs:**

- Development proposals that reduce the extant respite period or introduce **additional** night flights.
- Development that would enable the use of the airport site for helicopters or drones.
- Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.

## N7.SA1 Abbey Mills

**AP62.** Council to amend the potential modification to policy N7.SA1 to refer in the second paragraph to the need to replace the existing temporary mosque.

### Council Response:

16.1 The following modification is proposed to policy N7.SA1 This is also included in the Schedule of Proposed Modifications (ED020).

#### Policy N7.SA1 Abbey Mills | Development principles

[...]

Development should replace the existing temporary **mosque** ~~community use with the equivalent amount of community floorspace~~, meeting the requirements of Local Plan Policy S11. ~~Development should address the need for community facilities in the area by delivering~~

~~new community facilities in Twelvetreelocal Centre, unless it can be demonstrated that the needs of the community have already been met.~~ Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.

### **N8.SA7 Rick Roberts Way**

**AP63.** Council to amend the potential modification to policy N8.SA7 to clarify whether play areas and MUGA would be within the 1.2 hectares of green space or additional to it.

#### **Council Response:**

17.1 As demonstrated in the Topic Paper Site Capacity Study (ED003b), 1.37 ha has been modelled for green space provision, comprising 1.2 ha for the park and 0.17 ha for the MUGA and play space.

17.2 To maintain consistency, site allocations specify only the amount of publicly accessible green space required to address deficiencies identified in the 2025 Green and Water Infrastructure Strategy the definition of publicly accessible green space follows the hierarchy set out in Table 8.1 of the London Plan (2021) and includes:

- Regional Park (400 hectares)
- Metropolitan Park (60 hectares)
- District Park (20 hectares)
- Local Park and Open Spaces (2 hectares)
- Small Open Spaces (under 2 hectares)
- Pocket Parks (under 0.4 hectares)
- Linear Open Spaces.

17.3 In addition to the publicly accessible green space provision, where a need is identified, development is expected for example in the case of Rick Roberts Way, to provide publicly accessible play and sport (MUGA) spaces. The location and additional amount of green space modelled to deliver this will be assessed on a case-by-case basis, subject to viability and in accordance with Policy GWS1(4).

17.4 The Council also considers that the proposed amendments to paragraph 4.3 of Section 4: Neighbourhoods (Implementation text) provide flexibility in the site requirements, allowing decisions to be informed by up-to-date needs assessments and the agreed financial viability of the scheme

17.5 The following modification is proposed to policy N8.SA7. This is also included in the Schedule of Proposed Modifications (ED020).

#### Policy N8.SA7 Rick Roberts Ways | Infrastructure requirements

Development should address existing ~~open~~ **green** space deficiencies by providing a small ~~open green~~ **green** space with a minimum of 1.2 hectares **and provide a sports-lit Multi-Use Games**

**Area (unless this is delivered at N8.SA5 Stratford Town Centre West) on the publicly owned land. Green space provision should meet the requirements of Local Plan Policies GWS1 and GWS3.** In addition to the ~~open~~ green space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm. ~~Development should provide a sports-lit Multi-Use Games Area unless delivered at N8.SA5 Stratford Town Centre West.~~ Play space should meet the requirements of Local Plan Policy GWS5.

### N13.SA3 East Ham Gasworks

**AP64.** Council to prepare a potential modification to policy N13.SA3 and the site map / indicative diagram that would be required if 1.84 hectares within the allocation were removed from MOL.

#### Council Response:

18.1 Following further discussions with the GLA, the following modifications are proposed to Policy N13.SA3. The potential modification to N13.SA3 Beckton Riverside site map / indicative diagram can be found in Appendix 2. These modifications are also included in the Schedule of Proposed Modifications (ED020).

N13.SA3 Former East Ham Gasworks	
Site address	Former East Ham Sports Ground Leigh Road.
Neighbourhood	East Ham
Site area	10.3 hectares
Public Transport Accessibility Level	0 – 3
Flood Risk	The site is shown to be at significant risk of flooding in Flood Zone 3 and Flood Zone 2, as well as being at pluvial flood risk in the 1% and 0.1% AEP events and also being at risk if the Thames were to breach its bank and defences were to fail.  <b>Following publication of the Strategic Flood Risk Assessment (SFRA), the Environment Agency has undertaken further flood risk modelling of the River Roding. This updated modelling must be used to inform any site-specific Flood Risk Assessment for the site.</b>
Utilities	Overhead Transmission Line <b>Route</b>
Heritage Designations	River Roding Archaeological Priority Area (Tier 3)
Natural environment Designations	In an area of deficiency of access to all types of Parks, except the southern half of the site which is within the catchment for Barking Road Recreation Ground Local Park and of under provision to publicly accessible <del>open</del> green space by head of population in 2038 <b>during the plan period.</b>

	<p>Metropolitan Open Land and Former Leigh Road Sports Ground Sites of Importance for Nature Conservation</p> <p>Air Quality Management Area</p> <p>Source Protection Zone 2</p>
Map	
Existing uses	Former gasholders and associated infrastructure and open space currently inaccessible to the public, which includes disused playing pitch.
Development principles	<p>Residential, <del>open</del> green space and community facility.</p> <p><b>Part of this site lies within designated Metropolitan Open Land (MOL). Newham’s MOL Review (2026) demonstrated exceptional circumstances to release a limited area of MOL at this location. Development should be limited to the minimum necessary to remediate the site and take place on the part of the site outside of the retained Metropolitan Open Land and maintain the site’s role in providing a continuous chain of open space along Newham’s eastern boundary. Development should explore the restoration of the Back River. Development of this site is contingent on delivering measurable improvements to the quality, accessibility and ecological value of the retained MOL (6.7ha).</b></p> <p><del>Development should protect, enhance and bring back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</del></p> <p><b>Development must protect the openness of the retained Metropolitan Open Land (MOL), enhance the site’s role in providing a continuous chain of green space along Newham’s eastern boundary and explore the restoration of the Back River (in accordance with Local Plan Policy GWS2).</b></p> <p><b>Development must enhance green space with a strong emphasis on:</b></p> <ul style="list-style-type: none"> <li>● increasing openness</li> <li>● improving public access across the retained Metropolitan Open Land (MOL)</li> <li>● strengthening connectivity and legibility within the wider green infrastructure network</li> <li>● re-providing and enhancing the Site of Importance for Nature Conservation (SINC) and maximising greening and Biodiversity Net Gain in accordance with Local Plan Policy GWS3.</li> <li>● Retains the maximum feasible quantity of designated green space in accordance with Local Plan Policy GWS1.</li> <li>● protecting, enhancing and bringing back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</li> </ul>

	<p>Development should address the need for community facilities by delivering a new community facility with a local neighbourhood appeal (smaller than 1,000 sqm Gross Internal Area), unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.</p> <p>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site-specific Flood Risk Assessment, as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment <del>(2023)</del><b>(2025)</b>.</p>
Design principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p>Mid-rise residential buildings below 21m (ca. 7 storeys) are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric. Massing should step down towards the east of the site to sensitively integrate with the existing two storey terraces on Leigh Road.</p> <p>The design and layout of the site should establish a connected network of streets and spaces and that connects into the existing street network and should create a street hierarchy. Routes to, from and through the site should improve access and connectivity to and along the River Roding and through the site from Southend Road through to Watson Avenue. The community facility should be located where there are good connections to the existing street network and in proximity to the open space.</p> <p>The layout of the site should protect the Site of Importance for Nature Conservation.</p> <p>Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6.</p> <p>The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site <b>and the existing overhead transmission line route</b>, and minimise the impact of noise from any required Pressure Reduction System on residential amenity.</p> <p>The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.</p>
Infrastructure requirements	<p>Development <del>should</del> <b>must</b> address existing <del>open green</del> space deficiency by <b>maximising public access to the retained 6.7ha of Metropolitan Open Land.</b> <del>retaining the Metropolitan Open Land and make it publicly accessible.</del></p> <p><b>The site is in an area of:</b></p>

	<ul style="list-style-type: none"> <li>• <b>deficiency of access to all types of parks, except the southern half of the site which is within the catchment for Barking Road Recreation Ground (Local Park)</b></li> <li>• <b>under provision to publicly accessible <del>open</del> green space by head of population</b></li> <li>• <b>under provision to NEAP, LEAP and LAP play facilities</b></li> <li>• <b>under provision of allotments</b></li> </ul> <p>The open space provision should prioritise community growing opportunities</p> <p><b>To address the exceptional circumstances required for the release of Metropolitan Open Land (MOL) at this site, and to remedy the open space deficiencies identified above, development must deliver green space provision that includes a consolidated Local Park which is a minimum of 2 ha, alongside other green spaces that maximise access to the retained MOL (6.7ha), retains the maximum on-site designated green space, and together meet the requirements of Local Plan Policies GWS1 and GWS3. In addition to the open space provision, development should provide as well as publicly accessible play space, including in the form of a Neighbourhood Equipped Area of Play (NEAP), a Locally Equipped Area for Play (LEAP). Development should and also provide play space in the form of a Local Area for Play (LAP) which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.</b></p> <p>Development should retain the gas governor on site.</p>
Phasing and implementation	<p>Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p> <p>The potential impact of the overhead transmission line on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.</p> <p>Medium to long term</p>

### N17.SA1 Beckton Riverside

**AP65.** Council to prepare a potential modification to the N17.SA1 Beckton Riverside site map / indicative diagram to reflect the modifications proposed in the SOCG<sup>4</sup> including the location shape of the new town centre as indicated in the Town Centre Network Review Methodology Review Update January 2026.<sup>5</sup>

#### Council Response:

19.1 The potential modification to the N17.SA1 Beckton Riverside site map /indicative diagram can be found in Appendix 2. This modification is also included in the Schedule of Proposed Modifications (ED020).

<sup>4</sup> ED22 30 January 2026.

<sup>5</sup> ED25 2 February 2026.

**AP66.** Council to prepare a potential change to the policies map to designate the new town centre as indicated in the Town Centre Network Review Methodology Review Update January 2026 and to describe this on the key as “New town centre – provisional boundary” (or similar).

**Council Response:**

19.2 This [GIS webapp link](#) is where you can view the amended policies map. *(To turn the layers on or off, in the top right-hand corner of the interactive map, you will see two icons. Please select the 'Map Layers' icon, this will list all the designations shown on the map. To turn the designations on or off please select the 'eye' icon next to each layer)*

**AP67.** Council to consider whether the proposed modifications to policy N17.SA1, policy HS1 part 2 and implementation text H1.2 need to be amended to be consistent with each other and with the policies map key, having regard to the co-designed masterplanning process.

**Council Response:**

19.3 The following modifications are proposed to policy N17.SA1, policy HS1 part 2 and implementation text H1.2. These are also included in the Schedule of Proposed Modifications (ED020).

Policy HS1 Part 2

2. New dDevelopment for the provision of main town centre uses **towards the creation of a new town centre** within N17.SA1 Beckton Riverside, **starting from the indicative boundaries mapped on the Policies Maps, must contribute to the masterplanned phased delivery of the centre by applying the following principles** must be accompanied and informed by masterplanning of the new town centre. This will be achieved through:

[...]

Implementation text HS1.2

The location, scale, **phasing**, nature and mix of uses for the new town centre will need to be considered through the masterplanning and the planning application process, and **should start from the indicative boundary identified on the policies map** ~~may not reflect the location of the current retail park.~~ **Any changes to the boundary should be justified by the evidence submitted as part of an application, including masterplanning, and should not impede the strategic principles set out by this policy, Policy N17 and the site allocation principles.** To inform this process, evidence will need to be provided in the form of an Impact Assessment, a Marketing Strategy and a Vacancy Prevention Strategy, in accordance with Local Plan Policy HS2.

Site allocation N17.SA1 Development principles

[...]

- A new town centre should be delivered, **starting from the indicative boundary mapped on the policies map**, consistent with a district centre designation. There is an opportunity to provide the quantity and scale of uses consistent with a major centre, if supported by the findings of an up-to-date and robust Marketing Strategy **and Impact Assessment**, in line with the requirements in Local Plan Policy **Policies HS1 and HS2**.

[...]

## Local centres

**AP68.** Council to prepare potential modifications to the relevant site maps / indicative diagrams and changes to the policies map to reflect the findings of Town Centre Network Review Methodology Paper Update January 2026.

### Council Response:

20.1 The potential modification to the site map /indicative diagram can be found in Appendix 2, this modification is also included in the Schedule of Proposed Modifications (ED020). This [GIS webapp link](#) is where you can view the amended policies map. *(To turn the layers on or off, in the top right-hand corner of the interactive map, you will see two icons. Please select the 'Map Layers' icon, this will list all the designations shown on the map. To turn the designations on or off please select the 'eye' icon next to each layer)*

**AP69.** Council to amend the policies map key to read “Future local centre – provisional boundary” (or similar).

### Council Response:

20.2 This [GIS webapp](#) link is where you can view the amended policies map. *(To turn the layers on or off, in the top right-hand corner of the interactive map, you will see two icons. Please select the 'Map Layers' icon, this will list all the designations shown on the map. To turn the designations on or off please select the 'eye' icon next to each layer)*