Newham London

Our Newham Local Plan

2026 - 2042









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NEWHAM LOCAL PLAN
INTRODUCTION

MAYOR'S FOREWORD



Newham is a borough of ambition, energy and possibility. Our greatest strength is our people: our communities, our diversity, our resilience and our determination to build a better future.

This is the borough where I grew up and where I am raising my family. I know its strengths, I understand its challenges, and I see every day the extraordinary potential of the people who call it home. From our community organisations and independent traders to our growing businesses and world-class destinations, Newham is powered by people who care deeply about where they live and what comes next.

Our challenge is not simply to grow Newham. It is to make growth work for Newham's people.

We have so much to build on. A young and diverse population. Strong connections to the rest of London and beyond. The opportunities of the Queen Elizabeth Olympic Park and the Royal Docks. And communities full of talent, ambition and enterprise. However, potential means little if local people cannot share in the benefits. Growth must be felt in people's homes, in their pay packets, on their high streets and in the places where their families and communities come together.

My ambition is clear: a Newham where everyone has a fair chance to thrive, and where no community is left behind.

That means more genuinely affordable and social rented homes. Better jobs, stronger skills and real routes into opportunity. High streets that are busy and thriving. Neighbourhoods that are cleaner, safer and greener. Good-quality family homes, welcoming public spaces and places where people can put down roots, build relationships and feel proud to belong.

This Local Plan is central to making that ambition real. It sets the direction for how our borough will change, where development will happen and what we expect it to deliver. It provides a clear framework for local people, businesses, communities and investors, rooted in a simple principle: development must serve the people of Newham.

We will welcome investment that creates lasting opportunity, strengthens our neighbourhoods and delivers real benefits for local people. We will push for the genuinely affordable and social rented homes our residents need, support high-quality family housing, insist on excellent design and carefully manage the impact of tall buildings. We will protect what makes our neighbourhoods distinctive while creating places fit for the future.

We must also be honest about the pressures we face. Housing costs are high. Household budgets are stretched. Businesses face rising costs, and the delivery of new homes and essential infrastructure is increasingly challenging. Ambition alone is not enough. We need a plan that is bold about what Newham deserves, realistic about what can be delivered and relentless in making the most of every opportunity.

The homes, workplaces, streets and public spaces we create today will shape the lives of generations to come. Local people must be able to access the jobs and skills that development brings. Businesses must have the confidence to start, grow and invest here. Community organisations must have a meaningful voice in shaping change. And every neighbourhood must have the opportunity to share in our borough's success.

This Local Plan has been shaped by local people, businesses, community organisations, neighbouring authorities and elected members who have taken the time to share their experiences, challenge our thinking and help shape Newham's future. I thank everyone who has contributed. Your voices matter, and our responsibility is to turn that engagement into action.

The future of Newham is not something that simply happens to us. It is something we shape together. It demands that we listen, that we work in partnership and that we remain focused on what matters most: the lives people lead, the opportunities they can access and the communities they leave to the next generation.

I want a Newham where families can afford to stay, young people can build their futures, businesses can succeed and every resident can feel that this borough is working for them. A borough that embraces change without losing its identity. A borough that attracts investment without losing sight of its people. A borough where progress is measured not just in buildings completed, but in lives improved.

This is our opportunity to shape a fairer, stronger and more inclusive Newham. Let us realise that ambition together.

Mayor Forhad Hussain
Mayor of Newham

@ForhadHussain2026
@ForhadHussain

ALL ABOUT THE LOCAL PLAN

What is a Local Plan?

i.1 The Local Plan is the key planning document which we will use to shape, plan and manage growth, regeneration and development across the borough to 2042.

i.2 The new Local Plan sets out a vision, objectives, spatial strategy and planning policy framework. We will use it to assess planning applications and guide our decisions on:

- the location, amount and type of development to be delivered in the borough;
- the standards that development should meet;
- what it should look like;
- what services and infrastructure are needed and where; and
- how all residents will benefit from the proposed levels of growth and development.

i.3 However, there are limitations on what can be controlled through the Local Plan. For example, some forms of development do not require planning permission, such as some changes to the use of a building or some alterations to a house. The planning system cannot specify who or which business occupies a development. Planning cannot require a landowner to develop or change the lawful use of the building or land. Planning also operates alongside, and should complement, other types of regulation, such as building control, licencing and environmental health legislation.

What is this document?

i.4 This document is our new Local Plan for Newham. It contains the vision, objectives, spatial strategy and planning policy framework which we consider will best address the challenges and make the most of opportunities which face Newham now and in the future.

i.5 This Local Plan replaces the following Development Plan documents for Newham: the Newham Local Plan 2018, the Newham Gypsy and Traveller Development Plan Document 2017 and the London Legacy Development Corporation Local Plan 2020.

1.6 The Local Plan has been informed by the responses we received on our Issues and Options[1] document, during the consultation held at the end of 2021, and on the draft Local Plan (Regulation 18), during the consultation held in January and February 2022, and on the submission Local Plan, during the consultation held from July to September 2024.

i.7 It has also been informed by evidence base documents which have been researching specific aspects of the Plan and emerging council and regional strategies and area-specific guidance – including for Stratford and the Royal Docks. The document also responds to national and regional planning policy. More detail on the Local Plan's relationship to other plans is outlined below.



[1] The Issues and Options Document set out Newham's biggest challenges and opportunities and suggested ways these could be best addressed through planning policies. It is available here: https://www.newham.gov.uk/downloads/file/3831/local-plan-issues-and-options-october-2021

Why do we need a Local Plan? Why refresh it?

i.8 We are required to review our Local Plan every five years to make sure it meets our current needs and aspirations and responds to legislative updates and updates to other Plans (see below). Over the last few years we have all experienced disruption and uncertainty and many residents are currently facing increased hardships as a result of the cost of living crisis. We need a new Local Plan to ensure that our planning policies reflect our current needs, for homes, workspaces and social infrastructure; addresses our challenges as well as making the most of our opportunities. These include the land owned by the Council and the Mayor of London, being home to London's only Enterprise Zone, the new transport infrastructure in the borough and the youth and dynamism of our population and economy. All of which can be used to build a fairer Newham for all, deliver good growth, as required by the London Plan (2021), and ensure sustainable development, as required by the NPPF.

i.9 Finally, during the development of this Plan, planning powers in part of Newham transitioned from the London Legacy Development Corporation (LLDC) Planning Authority back to the London Borough of Newham. This Local Plan therefore covers the entirety of Newham.

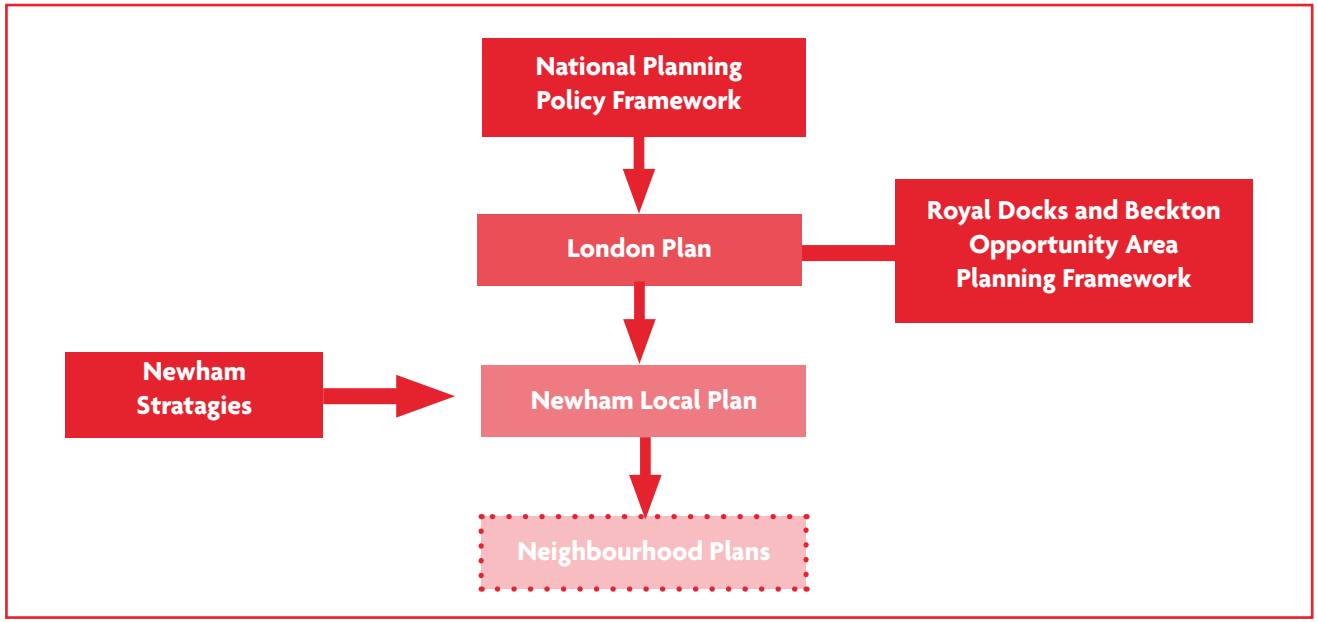


What is the Local Plan's relationship to other plans?

i.10 The Local Plan must take into account the policies set out by national government in the National Planning Policy Framework (NPPF) and the policies set out by London's regional government in the London Plan (2021). As a starting point, our Local Plan is expected to be consistent with national planning policies, such as those found within the NPPF, and to be in general conformity with the policies set out in the London Plan (2021).

i.11 Newham currently has no designated Neighbourhood Forums or Plan Areas, but if they were to be established in the future, any Neighbourhood Plan they were to create would have to be in general conformity with the strategic policies of the Local and London Plans and have regard to relevant national policies.

i.12 In May 2023 the Mayor of London published the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) as London Plan Guidance. This means it provides additional guidance on how the London Plan (2021) should be interpreted and delivered in this part of the borough. We have also used the OAPF to help inform parts of the submission Local Plan.



i.13 During the development of this Local Plan, central government announced a series of national planning reforms, and policy updates. Latest amongst these was the National Planning Policy Framework 2024. However, in accordance with the transitional arrangements outlined in that document, this Local Plan has been developed in accordance with the NPPF 2023.

i.14 At the heart of the Local Plan refresh are the delivery of the Council's core strategies.

These include:

- Building a Fairer Newham: Corporate Plan 2022-2026
- Building Newham's Creative Future (2022)
- Towards a Better Newham: COVID-19 Recovery and Reorientation Strategy (2021)
- Just Transition Plan (2023
- Tackling Racism, Inequality and Disproportionality (2021)
- 50 steps to a Healthier Newham (2024)
- Social Integration Strategy (2020)
- The Newham Young People's Charter (2022)

What other Information has informed the Local Plan?

Engagement

i.15 This Local Plan has been shaped by three stages of public consultation. At each stage, residents, businesses and other stakeholders have been able to provide feedback on the contents of the Plan. However, the role and focus of the consultation changes at each stage.

i.16 The responses we received at each consultation and how the draft Local Plan responded to these comments are included in the Engagement Reports, available on the Council's website[2].

i.17 To participate in future planning document consultations, please add yourself to our planning policy dataset on the Council's website. For information about how you can be involved in all aspects of planning at Newham, please review the latest version of the Council's Statement of Community Involvement on the Council's website. Please note, this will be reviewed following the adoption of the Local Plan.

Evidence base

i.18 To make sure we have a suitable understanding of what we already have in the borough that may require protection, what we need to build and what the market trends are; we have commissioned and developed a series of evidence base documents, which use and analyse quantitative and qualitative data, site visits and expert input to provide us with this information.

i.19 During the production of the Local Plan, some 2021 Census demographic data has been released, but this data was not available when most of the evidence base documents were being developed. The Local Plan team used the latest available data at the point of developing the relevant evidence base documents. Growth projections in the submission Local Plan and supporting evidence base documents have been informed by the Greater London Authority's (GLA) Housing-led population projections which is informed by the London Plan (2021) housing target.

i.20 The following evidence base documents have been produced and are available on the Council's website[3].



[2]:https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/3; https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/2 and https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/6 [3]:https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/4

Document	Details
Characterisation Study (2024)	A study to consider design, function and socio-economic makeup of the borough to: • Support the creation of the Local Plan's spatial strategy, including identifying neighbourhoods. • Develop borough wide design guidance. • Develop neighbourhood specific design principles. • Identify suitable locations of tall building zones. Further detail on the analysis supporting this process is available in a new Tall Building Zone Annex.
Strategic Housing Market Assessment (SHMA) and Gypsy and Traveller Accommodation Assessment (GTAA) (2022)	An assessment to identify the type of homes required by all residents (tenure and size) to ensure the delivery of homes which meet needs. The assessment includes a review of specialist housing needs, including for older residents, specialist housing, student housing and for Gypsy and Traveller pitches.
Retail and Leisure Study (2022)	An assessment of the supply and demand of land for retail and commercial leisure uses (such as restaurants and cinemas) and the function of the existing Town Centre network with recommendations provided on a town centre strategy which supports the delivery of the network of well-connected neighborhood objectives.
Employment Land Review (2022)	An assessment of the supply and demand of employment land and floor space and the function of existing employment designations with recommendations provided on an employment land use strategy in keeping with Newham's community wealth building objectives.
Climate Change Evidence Base (2022)	A study to consider and outline the most effective and deliverable measures to reduce carbon production from new buildings and construction work and through retrofitting, as well as how to address overheating.

Document	Details
Community Facilities Needs Assessment (2022)	An assessment of the current and future supply and demand of community facilities with recommendations on how to improve their delivery and meet the needs of Newham's residents and support the delivery of the network of well-connected neighborhood objectives.
Waste Plan Evidence Base (2022)	An assessment of the availability of waste sites in the context of the London Plan (2021) waste targets, with recommendations on the most appropriate approach to planning for each of the relevant waste streams. LB Newham is part of the East London Waste Authority, together with LB Barking and Dagenham, LB Redbridge and LB Havering. This document was a joint procurement to support the development of an updated Joint Waste Plan.
Site Allocation and Housing Trajectory Methodology (2024)	A methodology note outlining the approach to: • Identifying and selecting site allocations. • Identifying suitable uses on sites. • Determining site capacities, including for small sites. • Determining site phasing. • Identifying further potential sources of housing supply.
Built Leisure Needs Assessment (2025)	An assessment of the current and future supply and demand of built sports facilities, such as leisure centres, gyms and swimming pools. It also undertakes an assessment of water related sports, Multi-Use Games Areas and Urban Sports provision. It then provides an assessment of options to meet this need.

Document	Details
Green and Water Infrastructure Strategy (2025)	A strategy to consider all green and water infrastructure in Newham to: • Assess the current and future supply and demand for different forms of open space. • Develop standards for the quantity and quality of open space. • Assess the quality of open space in the borough. • Identify options to deliver increases in the quantity and quality of open space. • Assess Newham's biodiversity and identify opportunities to improve it.
Metropolitan Open Land Review (2025)	A review of MOL/Green Belt designations to ensure that designations and their boundaries reflect the NPPF and London Plan policy requirements and Newham's strategic requirements for green infrastructure.
Sites of Importance for Nature Conservation Review (2025)	An assessment of the Sites of Importance for Nature Conservation (SINC) sites identified in the adopted Local Plan and of sites that could be added to Newham's inventory of SINCs to identify: • Existing SINCs where no changes are proposed. • Existing SINCs where boundary changes are proposed. • Proposed SINCs to be added to the list of SINCs designated by Newham. • SINCs designated in the 2018 Local Plan that should be de-designated. • Changes to the type of SINC.
Newham Burial Space Study (2024)	An assessment to consider the burial needs of Newham's residents and the suitability of sites within Newham for additional burial facilities, to meet these needs.

Document	Details
Playing Pitch Strategy (2025)	An assessment of the current and future supply and demand of playing pitches and recommendations on how to ensure there is sufficient provision over the Plan period.
Sustainable Transport Strategy (2024)	A strategy to assess whether there is sufficient capacity within the transport network to support the proposed level of growth in a sustainable way. It then identifies where strategic and local interventions are required to deliver sufficient capacity and provides recommendations on further interventions to enable shifts to more sustainable and active ways of travelling.
Report on the housing design needs of neurodivergent residents and residents with learning disabilities (2025)	A research study to understand the housing design needs of neurodivergent residents and residents with learning disabilities and the housing design preferences of residents on Newham's housing waiting list and to make recommendations on how new homes can meet these needs and preferences.



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Document	Details
Strategic Integrated Water Management Strategy (2023)	A strategy developed with the GLA, Environment Agency, Natural England, Thames Water and neighbouring boroughs and covering an area around the Lower Lea. It outlines: • An understanding of water related risks in the sub-region under different growth and climate change scenarios. • Interventions and measures needed to ensure sustainable growth in response to identified water risks.
Local Integrated Water Management Strategy (2023)	A strategy developed with the GLA, Environment Agency and Thames Water, which covers the Royal Docks and Beckton Riverside Opportunity Area. It considers the constraints and opportunities for sustainably managing water supply, demand and drainage in the study area in the context of significant residential and commercial development anticipated over the coming decades.
Strategic Flood Risk Assessment Level 1 and Level 2 (2023) and Sequential and Exception Tests (2024)	Studies to provide an up-to-date Strategic Flood Risk Assessment of development in Newham, taking into account the most recent policy and legislation in the NPPF and the latest available information and data for current and future (including consideration of climate change) flood risk from all sources, and how these may be mitigated. The set of documents includes an overview report (level 1); a report with site specific assessments for development sites in the borough (level 2); and a report which considers the availability of land with lower flood risk to deliver required development (the sequential and exception tests).

Document	Details
Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025)	A Strategy to mitigate recreational pressure in Epping Forest Special Area of Conservation (SAC). The strategy sets out: • a set of fully costed of interventions to be delivered in the London Borough of Newham (LBN) • Newham's SAC Recreation Mitigation tariff All new homes built within the Zone of Influence (ZOI) will be required to make a financial contribution to the delivery of these interventions.



Appraisals

i.21 As we developed the Local Plan, we continuously assessed it to check how it, and possible alternative options, may impact existing social, economic and environmental factors within Newham. The Plan aims to be reducing and mitigating any potential negative effects in relation to these factors and seeking ways to deliver improvements and benefits. This assessment is contained within the Sustainability Appraisal.

i.22 Alongside the Sustainability Appraisal an Equalities Impact Assessment (EQIA), a Health Impact Assessment (HIA) and a Habitats Regulation Assessment (HRA) have also been produced and published as part of the Integrated Impact Assessment.

i.23 An EQIA is a way of measuring the potential impact (positive or negative) that the Local Plan may have on different groups protected by equalities legislation, so that any such impact can be addressed and mitigated, where necessary.

i.24 An HIA is a systematic approach to predicting the potential health and wellbeing impacts of the Local Plan. An HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities.

i.25 An HRA considers the potential impact of the Local Plan on significant natural habitats.

i.26 During the last consultation, we also sought comments on these assessments. Comments received have been considered and updates have been made to the appraisal documents in response to these comments as well as to respond to the changes we have made to the Local Plan since the last consultation. The Integrated Impact Assessment provides a summary of these changes and the reflective process used to continuously assess and inform the Local Plan.

Viability

i.27 National policy requires us to assess the likely financial cost of delivering the policies and requirements in the Plan to make sure they are not so expensive that they prevent needed development from occurring. This is called a viability assessment. A viability assessment has been undertaken on this submission Local Plan which is published alongside the Local Plan.



How to use this document

i.28 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.29 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 heritage/character/placemaking assets statements. The Council's local validation list (Planning Application Requirements) will specify which requirements can be integrated into these documents and which could 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.

i.30 Under each policy is a list of additional policies in the Local Plan and London Plan (2021) (under the title Policy Links), which are likely to be relevant to proposals being assessed under the given policy. However this list is not definitive.

[4] https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/5

The contents of the Local Plan are:	
Section 1: All about Newham	• An introduction to the borough and our key issues and opportunities.
Section 2: Vision and Objectives	• Our long-term vision for how we will build a fairer Newham and the objectives we need to meet to deliver this vision.
Section 3: Policies	• Outlines the policies that will be used to shape and manage growth, regeneration and development across the borough. These are organised into ten topic chapters. • The ten topic chapters cover policies on building a fairer Newham, design, high streets, social infrastructure, inclusive economy, homes, green space and water space, climate, transport and waste and utilities. • All policies in the Plan are considered strategic policies, with the exception of the following: - BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing - D5: Shopfronts and advertising - HS6: Health and wellbeing on the high street - T4: Servicing a development
Section 4: Neighbourhoods	• Outlines policies for each of our 17 neighbourhoods and the 45 site allocations within them. • All neighbourhood policies and site allocations in the Plan are considered strategic policies.
Appendix 1: Glossary and abbreviations	A list of key terms and abbreviations used in the Local Plan and their definitions.
Appendix 2: Monitoring framework	A list of the monitoring indicators we will use to ensure the plan is successfully delivering our vision and objectives.
The policies and proposals set out in this document are also illustrated on a Policies Map.	

NEWHAM
LOCAL PLAN
ALL ABOUT NEWHAM

ALL ABOUT NEWHAM

Introduction

1.1 Newham is an inner London borough situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. Historically, the borough has been divided into two halves: residential neighbourhoods in the centre and north of the borough built around and along the historic routes connecting central London to Essex, and areas along its three rivers, home to mainly industrial uses and large-scale infrastructure.

1.2 Since the closure of the Royal Docks these former industrial areas are undergoing a significant transformation, making Newham a focal point for regeneration in London. Investment in homes, modern industrial workspaces, education, cultural and retail facilities are happening at a greater scale here than anywhere else in London.

1.3 Newham strategic location at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor adds to its significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

1.4 Our borough is well served by public transport and now benefits from 5 new accessible Elizabeth Line stations at Stratford, Manor Park, Forest Gate, Maryland and Custom House. Of the 28 Transport for London stations in Newham, only 4 stations lack step free access.

Our People

1.5 Newham has a young, diverse and rapidly increasing population. It has grown rapidly over the last ten years with a 14 per cent increase in population between 2011 and 2021 to be London's third-largest borough by population. Its projected population in 2030 is anticipated to be 465,435. Newham is London's second most ethnically diverse borough with 42.3 per cent of residents identifying as Asian, Asian British or Asian Welsh, 17.4 per cent as Black, Black British, Black Welsh, Caribbean or African and 30.8 per cent as White, and with over 200 languages and dialects spoken. The majority (53.7 per cent) of Newham's residents were born abroad with the largest percentages coming from Bangladesh, India, Romania and Pakistan. Newham residents report a higher level of religious belief than the London average, with most identifying as Christian, Muslim, Hindu or Sikh. The average age of a Newham resident is 32.7 years of age and 34.5 per cent of our residents are under 24. The 2021 Census confirmed that 20 per cent of the population is under 15 years of age. However, the number of older residents is growing and by 2050, Newham is predicted to have the most residents aged over 50 in all north east London boroughs.

1.6 One of the key challenges for Newham is the level of poverty and inequality. While significant improvements have been made over the last five to ten years, over a quarter of Newham's wards are in the 20 per cent most deprived wards in the country, 72% of Newham residents live in neighbourhoods in the most deprived three deciles in England and Newham has the 2nd highest number of children under 16 in relative low income families in London. These challenges were exacerbated by COVID-19, with the biggest increase in claimant rates and highest number of people furloughed in London. The Cost of Living Crisis is also being felt more keenly in Newham than in other parts of London, with the second highest fuel poverty rate in London, significantly higher rates of private renting and far lower average incomes than the rest of London.

1.7 Although life expectancy at birth in Newham is similar to the rest of England, healthy life expectancy is lower, through a susceptibility to long term illnesses, risk factors and exposures to harmful agents, like smoking or alcohol. In addition, Newham residents' rate of life satisfaction and sense that things they do in their lives are worthwhile are lower than their London and England counterparts. However, there are also positive signs to build on, with levels of happiness higher and anxiety lower in Newham than many other places within the city and country.

Our Economy

1.8 Newham contains around 13,940 registered businesses with 94 per cent of businesses employing fewer than nine people. The rate of business growth is at a significantly higher rate than London and the UK, however business closures are also slightly higher. Job numbers in the borough have risen rapidly over the decade averaging around 10,000 additional jobs each two-year period, achieving a 54 per cent increase since 2015. Public sector jobs remain a large proportion of the overall total (around 30 per cent), with significant job increases in sectors such as retail and business support.

1.9 While the level of growth and entrepreneurism in the borough is to be celebrated, significant challenges remain. Productivity remains low and is substantially below the UK average. Average pay in 2022 was £578.30/week (£30,072/year) compared to £645.80/week across London, with more than 30 per cent of our residents paid below the London Living wage, and this rises to over 50 per cent for ethnically diverse residents. Our residents are the most over-indebted in London. The borough has lower employment rates (by claimant count) for women (6.6 per cent) and youth unemployment (4.7 per cent) than the London averages (4.4 per cent for both women and young people). There are still 21% of residents with no qualifications (unchanged since 2011).

Our Homes

1.10 14,430 homes were built in Newham (including the former LLDC area of the borough) between 2017/18 and 2021/22, and the Council is delivering 2,000 council homes at social rent. Despite this significant increase in housing numbers, the median house price in Newham stands at £419,603 as of June 2023 (14 time annual earnings) and average private rents have increased by around 40 per cent between 2014 and 2019. Our average rents now represent 65 per cent of average wages compared to 30 per cent across the UK, a contributing factor as to why 49 per cent of Newham residents are in poverty after housing costs are taken into account. In 2019, Newham had the second highest rough sleeping population in London and this remains a significant challenge. The number of residents in temporary accommodation doubled from October 2022 to June 2023.

Our Neighbourhoods

1.11 Newham is a hugely diverse borough made up of a variety of neighbourhoods each with their own identity and unique characteristics. These neighbourhoods developed at different times and are often centred on a historic high street or around the distinct industries which developed in Newham in the 19th and 20th centuries, including the docks.

1.12 Newham currently has six Town Centres, 13 Local Centres, and 12 Shopping Parades and this Local Plan designates further shopping areas, all of which play an important role in the economic and community life of the borough. In 2018, Newham's high streets hosted 52 per cent of retail jobs, 61 per cent of jobs in accommodation and food services, and 38 per cent of jobs in other service industries. Positively, 88 per cent of residents rate shopping facilities as good.

1.13 Most of our high streets fulfil a local service and amenity function, with the exception of Green Street, whose visitor economy of South Asian fashion and jewellery has international networks that extend beyond London and the UK, and Stratford Metropolitan Centre, which has the potential to become an international centre on a par with London's central town centres.

1.14 Newham has a thriving Voluntary and Community Sector, with over 260 organisations and a significant number of community facilities, including four leisure centres, ten libraries, five youth zones, numerous places of worship and community centres. However, these spaces are unevenly distributed. The largest numbers of community facilities do not always align with where most residents live.



Our Environment

1.15 There are 44 accessible parks and gardens in Newham and numerous green spaces totalling around 262 hectares of publicly accessible green space. The Council manages over 70 public parks and green spaces. Other public parks are managed by the City of London (West Ham Park), the LLDC (Queen Elizabeth Olympic Park) and the Greater London Authority (Thames Barrier Park). The borough also benefits from access to the Lee Valley Regional Park, created in 1966 and managed by the Lee Valley Regional Park Authority, significant parts of which lie within the borough.

1.16 In addition to the green space in the borough, the Royal Docks were once the largest enclosed docks in the world and is a 250-acre expanse of water with significant possibilities for leisure, nature, sports and spectacular outlooks.

1.17 Despite these important natural facilities, green space only covers 10 per cent of Newham (19 per cent including water spaces), compared with 39 per cent for London as a whole. Only 7 per cent of the borough is accessible green space and the borough has just 16 per cent tree cover which is the second lowest in London.

1.18 Newham's location in London, with a significant number of strategic roads (managed by Transport for London) passing through the borough means that Newham residents are exposed to higher particulate pollution than in any other London borough. Newham has the highest death rate attributable to air pollution in England.

1.19 To tackle this challenge, as well as to play our part in contributing to global environmental sustainability, Newham declared a Climate Emergency in September 2019, which recognised the need for proactive action to change behaviours and to encourage new ways of working, living, and moving around.

Sources

- The State of the Borough report 2021 State of the Borough (newham.info)
- 50 steps to a Healthier Borough 2024
- Newham Housing Delivery Strategy 2021
- Community Facilities Needs Assessment 2022
- Employment Land Review 2022
- Census 2021
- Planning London Datahub
- Green and Water Infrastructure Study 2024

NEWHAM LOCAL PLAN

VISION AND OBJECTIVES

VISION AND OBJECTIVES

2.1 Together the vision and objectives establish our ambition for Newham in 2042. They are underpinned by the pillars of the Building a Fairer Newham Strategy (2022). Which superseded the Towards a Better Newham Strategy (2021), which formed the basis of our Issues and Options document. Our new strategy builds on these objectives as well as our achievements over the last four years, with Building a Fairer Newham serving as the foundation for the objectives and policies in this Plan.

2.2 All developments in the borough are expected to align with and advance these objectives. To ensure this outcome, the spatial strategy, policies, neighbourhood policies and site allocations have been developed to work individually and collectively to realise the vision and objectives. Our monitoring framework will oversee the implementation of these policies and the achievement of our vision and objectives.





Vision

No other borough is being transformed at the pace and scale that Newham is experiencing, both currently and over the next 15 years. Our vision is for this transformation to build a fairer, healthier and happier borough where creativity, diversity, an inclusive economy and community spirit can flourish and where residents feel proud of where they live.

In some of our 17 neighbourhoods change will be radical. As City Hall makes its new home in Royal Victoria, the area around it and the wider Royal Docks, which were once isolated industrial sites, will become new connected, lively areas of our borough. They will be home to existing and future Newham residents as well as businesses engaged in the new green, digital and creative industries, amongst others. These new communities will be matched in scale and ambition by a new Town Centre, connected by a DLR extension, at Beckton Riverside/Gallions Reach. Here, a new city district will provide homes, social infrastructure, modern industrial jobs and access to nature and the Thames.

Along the River Lea, through Canning Town and Manor Road and Three Mills new bridges and walkways will link residents to natural spaces, stations and neighbouring boroughs. At Custom House, the Elizabeth Line will serve newly regenerated and restored estates built around social infrastructure and local shops. In Stratford improved connectivity and targeted development will ensure that the global ambitions of the Olympic legacy delivers lasting benefits for all of Newham.

In many more neighbourhoods, change will be smaller but no less important. These changes, such as at Forest Gate and East Ham, will appreciate and enhance our shared built and cultural heritage and diversity. Our Town Centres and Local High Streets will be cherished spaces to meet, shop locally and explore, where local businesses represent the variety of cultures present in Newham.

Developments across our neighbourhoods will create new green and well-designed genuinely affordable homes. New spaces where businesses can grow, including in the Beckton Riverside, Twelvetrees Park and Former Bromley-By-Bow Gasworks and Thameside West site allocations will create high quality and well-paying local jobs – ensuring wealth created in our community stays in our community.

New development, including at Custom House, Plaistow North and Pudding Mill Lane, will provide opportunities to complete our network of well-connected neighbourhoods, delivering the shops, social infrastructure and inclusive open and green spaces that will bring our neighbourhoods to life and provide spaces for us to meet.

This will be complemented by interventions which make Newham a safe and enjoyable place to move around. Encouraging and improving the accessibility of walking, cycling and public transport will be prioritised on clean, safe, green and attractive streets where all feel welcome.

This growth will not compromise our commitment to tackling the Climate Emergency and will be delivered in line with our Just Transition Plan and inclusive growth agenda. New development will be zero carbon and retrofitting existing buildings will be supported and accelerated. Our network of parks, green spaces, docks and riversides will be protected and expanded, allowing the natural environment to flourish, while also addressing the lack of access to green spaces in some neighbourhoods. Climate resilient and nature-filled neighbourhoods will help residents and local wildlife live safely and healthily in a changing environment.

Instrumental in delivering this vision will be collaboration to bring together residents, local organisations, the council and developers to build trust and understanding about what is needed and achievable in each of Newham's 17 neighbourhoods. Young people in particular will be welcomed and planned for, ensuring they retain an enduring stake in their future and the borough's.

Objectives

1. A healthier Newham and ageing well

- Improving physical and mental health and well-being will be prioritised, to ensure we reduce health inequalities through a health integrated approach to planning.
- Health will be promoted through the creation of healthy environments with clean air, no food deserts and no food swamps.
- The health, happiness and wellbeing of our residents will be measured to monitor the success of developments and the Local Plan.
- Accessible and age-friendly communities and environments will be created.
- The accessibility and quality of healthcare facilities and services will be improved to meet growing demands for healthcare as our population increases.

2. An inclusive economy to support people in these hard times

- All residents will have access to local job opportunities, education, training and skill development.
- Our local economy will be supported through improving the quantity, range and affordability of employment space.
- The delivery of London's first London Living Wage neighbourhood will be supported.
- Access to employment through sustainable transport infrastructure and active travel will be improved.
- Businesses and residents will have access to the utilities and digital infrastructure required to function in the new economy.

3. People-friendly neighbourhoods with green and clean streets

- A greener and cleaner future in Newham will be created, to tackle the Climate Emergency through zero carbon development, retrofitting existing buildings and building climate resilient neighbourhoods.
- Biodiversity and access to nature will be improved, to support plants, animals and residents to thrive.
- Well-designed, clean and litter-free network of well-connected neighbourhoods will be created, which encourage physical activity, active travel, green public transport and reduced car use, resulting in greener streets and public spaces.
- Provision of, and access to, high streets, social infrastructure, green and open spaces will be increased through the delivery of a network of well-connected neighbourhoods.
- Our unique and diverse heritage will be protected and celebrated, requiring new development to be well-designed and that old and new buildings are well integrated.

4. Safer Newham where no-one feels at risk of harm

- Crime and fear of crime will be reduced and safe spaces and streets will be created through better, more inclusive, design of the public realm, including green and open spaces.

5. Homes for residents

- The homes required to meet the diverse needs of our population, including a range of specialist housing options to provide care choices, greater independence and support, will be delivered.
- Housing quality across the borough will be improved.
- Delivery of family homes at social rent will be prioritised because that is our most pressing need.
- Housing design will recognise, celebrate and function well for Newham's diverse communities.

6. Supporting young people to have the best start in life and reach their potential

- Our public, play, study and creative spaces and social infrastructure will create high quality, safe, fun and welcoming spaces for all young people.
- The accessibility of public transport for young people will be improved.
- Existing, new and improved access to education and childcare provision will be protected and delivered.
- Skills and career development will be provided to support young people's long term employment prospects in growth sectors.

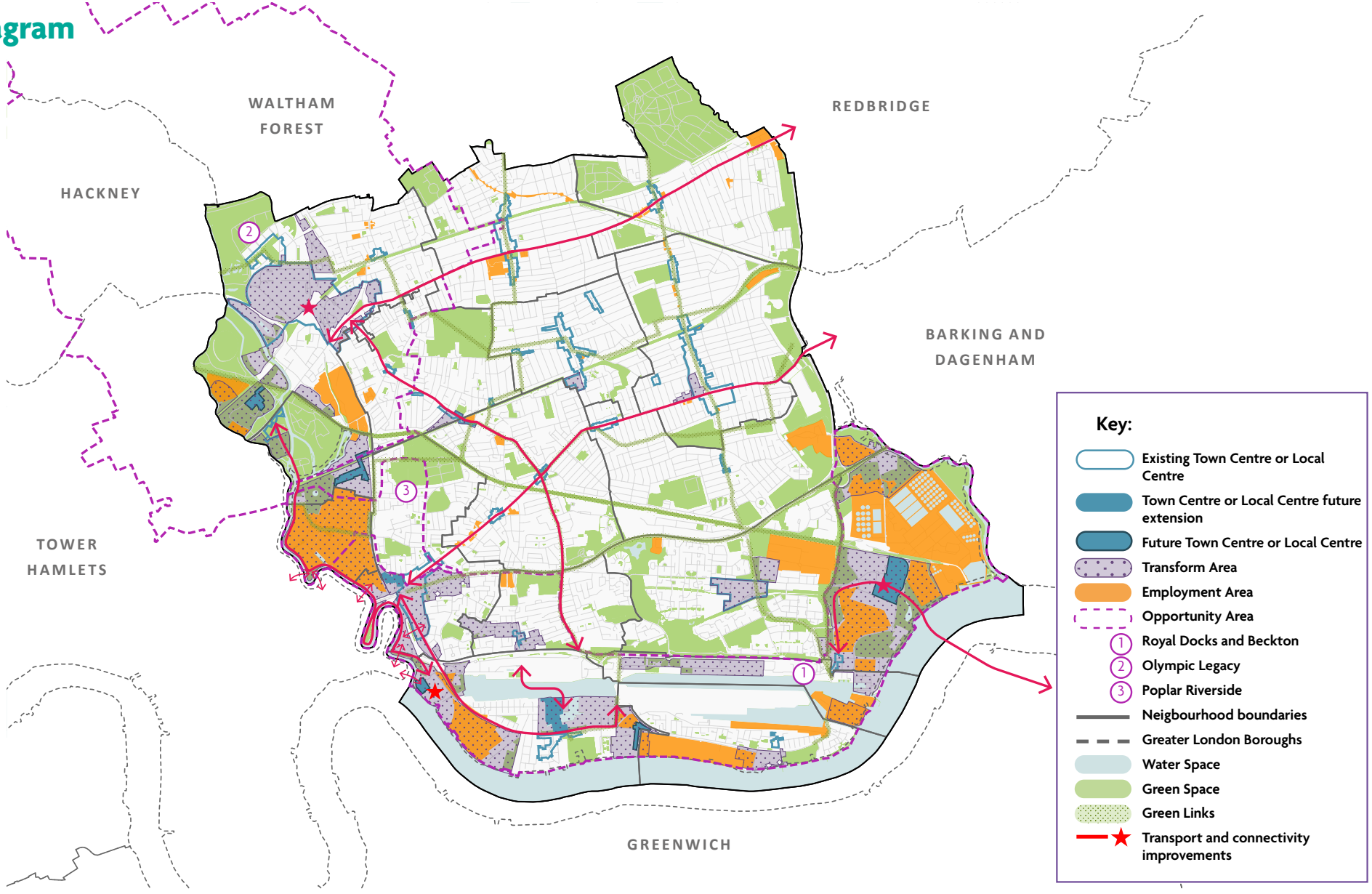
7. People powered Newham and widening participation in the life of the borough and the work that the Council does

- A more equal and affordable borough will be created, which reduces poverty and increases civic participation and inclusive opportunities for all.
- Sufficient physical, social, civic and digital infrastructure will be provided, as part of delivering inclusive growth which meets the needs of existing and future communities in Newham.
- Co-design principles will be embedded in delivering new development.
- Access to high streets, social infrastructure (to enable support networks), and green space will be improved through the delivery of a network of well-connected neighbourhoods, to create happier communities.
- New development will improve social integration.
- Cultural events, spaces and businesses will be supported.



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Key Diagram


WALTHAM FOREST
REDBRIDGE
HACKNEY
BARKING AND DAGENHAM
TOWER HAMLETS
GREENWICH
1
2
3
Key:
Existing Town Centre or Local Centre
Town Centre or Local Centre future extension
Future Town Centre or Local Centre
Transform Area
Employment Area
Opportunity Area
1 Royal Docks and Beckton
2 Olympic Legacy
3 Poplar Riverside
Neigbourhood boundaries
Greater London Boroughs
Water Space
Green Space
Green Links
Transport and connectivity improvements

NEWHAM LOCAL PLAN POLICIES

BUILDING A FAIRER NEWHAM

3.1 The Newham Local Plan sets out the spatial strategy for Newham to 2042. The spatial strategy identifies the location, scale and uses of development that will come forward in Newham and demonstrates how this growth will meet the needs of Newham's current and future population. This includes the target, set by the London Plan (2021), to deliver at least 47,600 homes in Newham over the period 2019/20 to 2028/29. This target will deliver homes to meet both Newham and wider London's housing requirements. The Newham Local Plan also seeks to meet Newham's needs for:

- a requirement for 335,000sqm of industrial floorspace
- a minimum requirement for 90,000sqm of office floorspace
- 25,973sqm of retail floorspace

3.2 This level of change and development creates a unique opportunity, and it is crucial that the delivery of this growth is undertaken in a way which is fair and supports the delivery of the nine objectives set out in the Vision and Objectives as well as the London Plan's (2021) Good Growth principles.

3.3 The delivery of these objectives requires growth which is correctly located, overcoming Newham's existing spatial disparities; involves Newham residents in creating holistic and complementary developments; delivers healthy neighbourhoods, in-keeping with community wealth building[5] principles; and which is supported by sufficient social infrastructure, to create improved social interactions and a network of well-connected neighborhoods.

This section contains the following policies:

- **BFN1: Spatial strategy**
- **BNF2: Co-designed masterplanning**
- **BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing**
- **BNF4: Developer contributions and infrastructure delivery**



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[5] Community Wealth Building is an approach to economic regeneration, which focuses on enabling measures that support communities to create wealth and retain more of the benefits of economic growth emerging locally. Further information can be found in Newham's Community Wealth Building Strategy.

Policy BFN1: Spatial strategy

1. Development will be directed to all of Newham's 17 neighbourhoods to distribute the benefits of growth, achieve Community Wealth Building outcomes and create a network of successful and well-connected neighbourhoods. This will be achieved through:
    a. directing significant levels of growth to:
        i. the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, which have the potential to deliver 36,000 new homes and 55,000 new jobs up to 2041, unlocked by an extension to the DLR and the delivery of two new DLR stations; and
        ii. the N6 Manor Road and N7 Three Mills neighbourhoods alongside the River Lea, which form part of the cross boundary Poplar Riverside Opportunity Area, which has a potential to deliver 9,000 new homes and 3,000 new jobs by 2041, supported and connected by a series of new bridges; and
        iii. the N8 Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station.
    b. supporting incremental change in the N9 West Ham, N10 Plaistow, N11 Beckton, N12 East Ham South, N13 East Ham, N14 Green Street, N15 Forest Gate and N16 Manor Park and Little Ilford neighbourhoods through the enhancement of each neighbourhoods' character and the delivery of site allocations.

2. Development will make the best use of land, optimise sites and deliver sustainable development by:
    a. applying a design-led approach which responds to the site's surrounding character and context; and
    b. supporting tall buildings in the borough's Tall Building Zones to ensure the delivery of the borough-wide spatial hierarchy set out in policy D4; and
    c. conserving and enhancing the borough's heritage assets and settings; and
    d. delivering zero carbon, climate resilient and nature-friendly developments.

3. Development will create new jobs and deliver a modern, greener and inclusive economy by:
    a. protecting and intensifying the borough's Strategic Industrial Locations and Local Industrial Locations for a diverse range of industrial and storage, logistics and distribution and related uses; and
    b. directing employment-led development to the borough's Local Mixed-Use Areas to deliver light industrial, small-scale office and workspace; and
    c. protecting and supporting low-cost workspace in the borough's Micro Business Opportunity Areas; and
    d. directing major office floorspace to Stratford Metropolitan Centre and smaller-scale offices to the Major and District Centres; and
    e. requiring new employment floorspace on identified site allocations; and
    f. supporting the location of industrial uses on out-of-centre retail and leisure parks; and
    g. supporting new workspaces in locations which complete a gap in the network of well-connected employment uses.

4. Development will meet the retail and leisure needs of residents, workers and visitors by
    a. Directing main town centre uses to the borough's network of Metropolitan, Major, District and Local Centres and supporting their diversification and in some cases expansion; and
    b. creating a new District Centre on N17.SA1 Beckton Riverside site allocation; and
    c. creating new Local Centres on N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks and N8.SA9 Pudding Mill; and
    d. creating expanded Local Centres on N1.SA2 Rymill Street, N2.SA1 Silvertown Quays, N7.SA3 Sugar House Island and N9.SA1 Plaistow North; and
    e. protecting and expanding the borough's network of Neighbourhood Parades to ensure the delivery of a network of well-connected neighbourhoods.

5. Development will protect and enhance existing parks and social infrastructure and support the creation of new parks and social infrastructure by requiring the delivery of:
    a. new or re-provided community facilities on suitable site allocations in areas with a deficiency in access to community facilities and by directing additional community facilities to the borough's network of town centres and accessible, neighbourly locations to deliver a network of well-connected neighbourhoods; and
    b. new schools on N2.SA1 Silvertown Quays, N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N5.SA4 Royal Road, N8.SA7 Rick Roberts Way and N17.SA1 Beckton Riverside site allocations; and
    c. new health centres on N1.SA2 Rymill Street, N2.SA4 Thameside West, N5.SA1 Custom House – Land surrounding Freemasons Road, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, N8.SA1 Stratford Central, N8.SA9 Pudding Mill and N17.SA1 Beckton Riverside site allocations and in the N14 Green Street Neighbourhood, subject to a needs based assessment at the time of delivery; and
    d. re-provided health centres on N10.SA4 Balaam Street Health Complex, N11.SA1 East Beckton Town Centre, N14.SA2 Shrewsbury Road Health Complex and N15.SA1 Lord Lister Health Centre site allocations; and
    e. new green space on the majority of site allocations, with new Local Parks of at least 2ha required on the N2.SA1 Silvertown Quays, N2.SA4 Thameside West, N4.SA4 Limmo, N7.SA1 Abbey Mills, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks and N17.SA1 Beckton Riverside site allocations, the creation of public access to the Metropolitan Open Land at the N13.SA3 Former East Ham Gas Works site allocation and the enhancement of the open space at N10.SA3 Newham Leisure Centre to create a new Local Park; and
    f. the re-provision of playing pitches at N13.SA3 Former East Ham Gas Works site allocation and the Lady Trowers Trust Playing Field, through bringing them back into public use; and
    g. new playspace or playable public realm on the majority of site allocations; and
    h. development that supports the Lee Valley Regional Park Authority's Development Framework Area Proposals[6] as they apply to the Park in Newham; and
    i. a new leisure centre on N11.SA1 Beckton Town Centre or N17.SA1 Beckton Riverside, a new sports facility at N8.SA7 Rick Roberts Way, a new leisure centre in the N4 Canning Town neighbourhood and an upgraded and redeveloped Newham Leisure Centre (as part of site allocation N10.SA3).

6. Development must contribute to improving strategic and local connections and increasing active travel through improved local walking and cycling connections; the implementation of Low Traffic Neighbourhoods; new bridges over the River Lea, docks and other barriers; the extension of the Leaway Walk, Thames Path and Capital Ring; and by reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling.

7. Development must protect and support improvements to the borough's strategic and utilities infrastructure while mitigating any negative impacts.

8. Meanwhile (temporary) development must contribute to delivering the Plan's vision and objectives, through:
    a. activating sites with uses which meet local needs and secure long-term social value by building on existing community initiatives and supporting job-creation for, and training of, the local community; and
    b. delivering an environmentally sustainable development which complies with the relevant design, amenity and transport policies; and
    c. not prejudicing the future long term development of a site.



[6] https://www.leevalleypark.org.uk/park-development-framework

Justification

3.4 This policy identifies where development and change will occur across the borough to deliver the Plan's vision and objectives. Newham is home to three Opportunity Areas: Royal Docks and Beckton Riverside and the Poplar Riverside and Olympic Legacy cross boundary Opportunity Areas. Opportunity Areas are designated in the London Plan (2021) as key locations with potential for new homes, jobs and infrastructure of all types. These Opportunity Areas are linked to existing or potential public transport improvements and the realisation of the levels of growth outlined are dependent on the delivery of these transport improvements. These areas of the borough will therefore see the majority of growth in Newham. However, growth and development will also occur in other neighbourhoods, where land is available for development and/or intensification and where the Characterisation Study (2024) has identified it as being suitable for growth and change. Growth in these neighbourhoods will provide locations for homes and employment as well as providing much needed social infrastructure, such as health centres and community facilities.

3.5 The Characterisation Study also helped identify a series of distinct neighbourhoods each of which has a separate policy to guide growth at a more local and detailed scale. These 17 neighbourhood policies are in Section 4 of the Local Plan and provide further guidance on the delivery of this spatial strategy within each of the borough's neighbourhoods.

3.6 To deliver Newham's regional economic role as a key location for industrial land, the Plan seeks to consolidate and optimise our remaining industrial sites to deliver modern, intensified, high quality workspaces and ensure they are suitably buffered from residential areas by lighter industrial and workshop uses. In addition, to deliver our green economy, a network of well-connected neighbourhoods and Community Wealth Building objectives we require variety in the types and locations of workspace. This includes promoting the role of the Stratford Town Centre as an important office cluster in the borough and protecting and enabling smaller clusters of workspace which can offer low cost and affordable workspace.

3.7 A key objective underpinning this spatial strategy is the delivery of a network of well-connected neighbourhoods, often within a 15 minute walk or cycle: ensuring all residents live within easy walking distance (often defined as a 15 minute walk) of shops, workplaces, community facilities, parks and civic amenities and that there are sufficient facilities to meet the needs of an increasing population. This recognises the importance of improved local facilities and will reduce the need to travel to access these facilities and services, especially by methods that pollute our streets. The strategy is not intended to create isolated and self-sustaining areas but to enable access to services and facilities for everybody within a series of well-connected neighbourhoods. The objective is for residents to be able to more easily access a range of different facilities and services, whether that is within the neighbourhood they live in or within the wider network of neighbourhoods. It also supports the delivery of a just transition to resilient, connected and green neighbourhoods across the borough.

3.8 This policy sets out how we will deliver this objective, through directing the delivery of key land uses, including social infrastructure, in needed locations, and in doing so overcome the borough's current uneven distribution of many of these key neighbourhood elements that residents tell us are needed to live happy and healthy lives in Newham. To ensure that everyone in the borough lives in a network of well-connected neighbourhoods while protecting and enhancing our town centres, we will be supporting the expansion of many of our existing centres and parades and creating new centres and parades.

3.9 The borough's quantity of publicly accessible green space for each person is low, and many areas lack good places for children to play. Despite this overarching deficit, significant areas of the Lee Valley Regional Park lie within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. These include the Lee Valley VeloPark and land consisting of the northern Olympic parklands, the open spaces and natural play at Three Mills Green and Riverside, part of the Greenway, and the Bow Creek Ecology Park.

3.10 The strategy therefore seeks to make the most of our existing green assets, including the Lee Valley Regional Park, while reducing our spatial and absolute deficits.

3.11 Meanwhile or temporary uses can deliver a number of benefits which support the delivery of the Plan's vision and objectives. This includes the activation of sites or phases of sites awaiting development and of vacant units in high streets; the ability to test new forms of development in advance of permanent development; and as opportunities for co-production in the design and delivery of a site. The realisation of these benefits must also be delivered alongside and balanced against the need to deliver high quality, environmentally sustainable development which complements the spatial strategy.



Implementation

BFN1.1	Further guidance on the delivery of growth and development in each of the borough's 17 neighbourhoods is included in section 4 of the Plan. The six neighbourhoods which form the Royal Docks and Beckton Riverside Opportunity Area are N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach. Sites where a significant level of growth is anticipated or which are required to deliver the Neighbourhood visions are designated as site allocations (section 4). Development on these sites, must comply with the site specific development and design principles outlined in the Plan's site allocations. The Council will work with partners and use the range of tools at its disposal to support the implementation of this policy and the delivery of these strategic sites. Development on other sites, known as 'windfall sites' will also make a significant contribution to meeting our housing and employment needs. These will be supported where they meet the policy requirements in the Plan.
BFN1.2	New developments should optimise the use of available land by responding to the site's context, the design policies and the guidance in the Characterisation Study (2024) to deliver well-designed development of an appropriate scale and size. Of equal importance for making the best use of land and delivering sustainable development is the requirement for development to be net zero, designed to mitigate the impacts of a changing climate and deliver spaces for biodiversity. Further guidance is provided in the Climate Emergency and Green and Water Spaces chapters of the Local Plan.
BFN1.3	Development should deliver the spatial strategy by ensuring that employment floorspace is provided in supported locations and is of an appropriate scale and nature. Further guidance is provided in the Neighbourhoods section and Inclusive Economy chapter of the Local Plan and the Employment Land Review (2022).

BFN1.4	Development should support the delivery of a network of well-connected neighbourhoods and enhance the vitality and viability of our network of town and local centres and neighbourhood parades by ensuring main town centre uses are provided in supported locations and is of an appropriate scale. Further guidance is provided in the Neighbourhoods section and High Streets chapter of the Local Plan and the Retail and Leisure Study (2022).
BFN1.5	Further information regarding infrastructure requirements on site allocations is provided in the Neighbourhoods section of the Local Plan. The types of community facilities which should be delivered under part 5a are buildings and spaces which provide community meeting places of the types included in the Community Facilities Needs Assessment (2022). These include education facilities with shared space, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). Applicants should refer to the Community Facilities Needs Assessment (2022) for details of the community facilities required in their neighbourhood. The need for new social infrastructure which are either sports facilities, schools and early years childcare facilities, healthcare facilities or parks, green spaces and playspace are allocated for separately (see parts 5b, 5c, 5e, 5f and 5g) and are supported by their own evidence base documents. Further guidance is provided in the Neighbourhoods section and Social Infrastructure chapter of the Local Plan. All development is expected to support the delivery of social infrastructure through the mechanisms outlined in policy BFN4.

BFN1.5	Newham will consult the Lee Valley Regional Park Authority (LVRPA) on planning applications which it considers could affect the Park. Under the terms of the Lee Valley Regional Park Act (1966), the LVRPA can refer any decisions by Newham to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.
BFN1.6	The Council is implementing a transformative series of transport and infrastructure schemes to improve local connections and make walking and cycling easier and safer. Further detail on these schemes is provided in the Neighbourhoods chapter and the Sustainable Transport Strategy (2024). Developments in close proximity to these transport interventions are expected to ensure their proposal supports the implementation of these schemes and all developments are expected to support their wider delivery through the mechanisms outlined in policy BFN4.
BFN1.7	Newham is home to a significant number of strategic utilities and infrastructure facilities – including Beckton Sewage Treatment Works, transport depots, wharves and pylons. Development in close proximity to strategic utilities and infrastructure must ensure the new development does not impact on its long term function and that the design of any new development mitigates any potential noise, dust, odour, light and other pollution from these existing strategic facilities on the users of new development, in line with the agent of change principle. The Council will continue to work with utilities providers and other public sector bodies to reduce the impact of these facilities and ensure improvements, including their decarbonisation and expansions, are supported, as required.

BFN1.8

Meanwhile uses should normally last for 5 years or fewer, reflecting the Local Plan review period. Applications for temporary development of longer lengths of time will need to comply with the Plan's spatial strategy, in particular policies which support the vitality and viability of town centres and employment designations. It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale).

Appropriate meanwhile uses are those which meet local needs, identified through consultation and co-design and/or market testing but could include homes (where the relevant policies in the Homes chapter are complied with), pocket parks, community gardens, spaces for nature, including habitat creation, community facilities, pop up shops or markets, affordable workspace or makerspace. For larger sites, meanwhile projects can help to engage on the permanent use of the site and test strategies for elements of the wider masterplan design such as wayfinding, lighting and local identity. Spaces can also be used as nurseries for plants which will be used in the final landscaping of the site.

Meanwhile uses must also comply with the Plan's commitment to tackling the climate emergency, meet BREEAM excellent, as and where applicable to the proposed use, and consider how temporary new builds can reduce their environmental footprint via Modern Methods of Construction and the potential for reuse of temporary new builds in other locations. An exception to the requirement to meet BREEAM excellent may be made for temporary structures seeking permission for a shorter time period. Where this is allowed, extensions in time are unlikely to be granted, to avoid long term poor quality development. Developments using Modern Methods of Construction should accord with the requirements of Local Plan Policy CE3. Newham's Climate Change Evidence Base (2022) provides further information on the environmental impact of a range of modern construction methods.

BFN1.8

Meanwhile uses must also not result in any unacceptable highways or transport impacts, be neighbourly and meet design requirements outlined in D1.4. An application for meanwhile uses should either be supported by a Meanwhile Use Strategy (if required under policy BFN2.4) or, if not on a phased site, by a statement outlining the likely future permanent use of the site and how any proposed meanwhile use aligns with, and will not prejudice, future development on the site.

Meanwhile uses, including those outlined with a Meanwhile Use Strategy, will be subject to their own planning applications.



Evidence base

- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Assessment, Opinion Research Services (2022)
- Retail and Leisure Assessment, Urban Shape Planning Consultants (2022)
- Employment Land Review, Stantec (2022)
- Community Facilities Needs Assessment, Publica (2022)
- Site Allocation and Housing Trajectory Methodology, LB Newham (2024)
- Built Leisure Needs Assessment, Strategic Leisure Limited (2025)
- Green and Water Spaces Infrastructure Strategy, Jon Sheaff and Associates with London Wildlife Trust (2024)
- Playing Pitch Strategy, KKP (2025)
- The Lee Valley Regional Park Development Framework, The Lee Valley Regional Park Authority (2010)
- Sustainable Transport Strategy, Systra (2024)

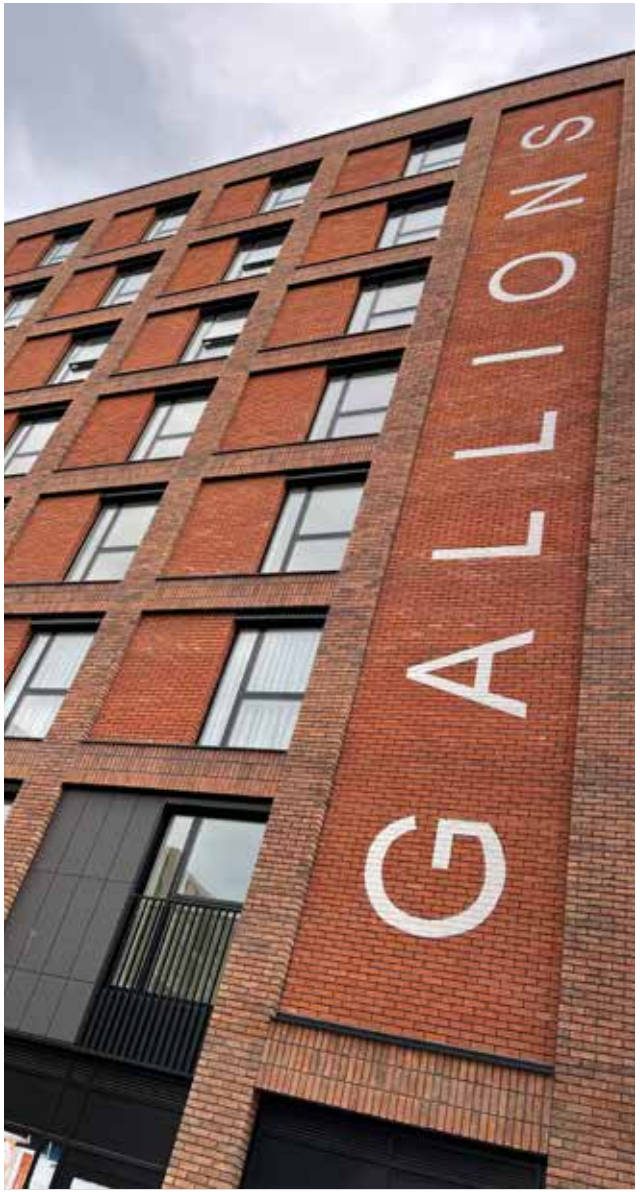
Policy Links

Local Plan:

- J1: Employment and growth
- J2: New employment floorspace
- T1: Strategic transport
- SI2: New and re-provided community facilities and health care facilities
- SI3: Cultural facilities and sport and recreation facilities
- SI4: Education and childcare facilities
- HS1: Newham's Town Centres Network
- HS2: Managing new and existing Town and Local Centres
- D3: Design-led residential site capacity optimisation
- D4: Tall buildings
- D6: Neighbourliness
- D8: Conservation Areas and Areas of Townscape Value
- D10: Designated and non-designated buildings, ancient monuments and historic parks and gardens
- H1: Meeting housing needs
- GWS1: Green spaces
- GWS2: Water spaces
- W3: Utilities and digital connectivity infrastructure
- Section 4: Neighbourhoods

London Plan 2021:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- SD1 Opportunity Areas



Policy BFN2: Co-designed masterplanning

1. Sites should be designed and developed comprehensively and collaboratively to ensure that their delivery supports the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles and that the timing of delivery is supported by infrastructure.

2. All major applications and applications on site allocations must undertake – or be supported by agreed pre-existing – co-designed site masterplanning, through engagement with different stakeholders. This masterplanning must consider all of the following, which will be reflected in any phased proposals brought forward by the landowner(s):
    a. how the required land uses and infrastructure provision on the site will be delivered;
    b. relevant neighbourhood and/or site allocation design principles;
    c. integration of the scheme with its wider surroundings, including any effects on the historic environment;
    d. delivery of key walking and cycling connections within the site and to and from key local facilities;
    e. layout of the site to ensure neighbourliness; and
    f. how Biodiversity Net Gain will be delivered on site, natural features will be incorporated and appropriate mitigation for environmental harm made.

3. All masterplans should demonstrate how the site will support the delivery of all of the following objectives:
    a. increased opportunities for social interaction.
    b. mixed, inclusive and stable communities.
    c. environments which support good physical and mental health.
    d. spaces young people can thrive in.
    e. zero carbon, climate resilient neighbourhoods.
    f. Inclusive design, with buildings and public spaces whose use and design reflects and meets the needs of Newham's diverse population; and
    g. Community Wealth Building.

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 safely activated through appropriate meanwhile uses without prejudicing the delivery of the permanent scheme.

5. All developments on site allocations are expected to demonstrate commitment to delivering the placemaking and socio-economic masterplanning aims approved, by undertaking post occupancy surveys and sharing the results with the Council.



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Planning obligations

- The implementation of Meanwhile Use Strategies for phased sites, where parts of the site will remain vacant or underused for more than three years.
- Post-occupancy surveys for all developments on site allocations.

Justification

3.12 Masterplanning and co-design are two crucial tools to ensure the delivery of Newham's key objectives. Significant levels of development in Newham are occurring on site allocations, which when complete will form whole new neighbourhoods and parts of the borough. Such sites must be well planned to deliver multiple mutually supporting objectives on the site itself, as well as create benefits for the wider area. Of equal importance are the smaller, more incremental changes, in well-established neighbourhoods, where masterplanning is necessary to ensure the best use of land and neighbourliness.

3.13 New development in Newham must meet the needs of Newham's residents. The policies in this Plan ensure this by requiring developments deliver on our key objectives – all of which can be influenced by the design, use and management of any scale of new developments. However, each part of the borough is different and the detailed requirements of local communities will change with time. Co-design, at the earliest opportunity, will therefore complement these policies, giving residents a genuine opportunity to shape the development of their neighbourhoods and applicants a vital resource to help understand the neighbourhood they are building in and create somewhere special and valued.

3.14 Post occupancy surveys provide an invaluable source of information on the occupancy of new developments, as well as the design and function of the development. This will help shape the Council's service delivery and infrastructure planning, as well as to help guide future policy and approaches to design.



Implementation

BNF2.1	Developments of all scales should be designed and developed comprehensively. Masterplanning enables this by establishing an agreed site or scheme design which considers an optimum approach to address all the factors outlined in part 2. For small sites (developments of under 0.25 ha), it is expected that when multiple small sites form part of an applicant's pipeline and are due to be developed in close proximity to each other and within a similar timeframe, these should be considered comprehensively. Submission documents should demonstrate a coherent design, amenity and delivery strategy. This is particularly the case when undertaking multiple infills on a single housing estate. For major applications and site allocations, compliance with this part of the policy will, in part, be demonstrated by a successful masterplan which delivers against the criteria in parts 2 and 3, including how this relates to any proposed phasing of the site. Where relevant, sites should be supported by a realistic phasing plan.
BFN2.2	It is expected that co-designed masterplanning should take place in advance of, and alongside, pre-application discussions. Early engagement with local communities in the creation of the site brief is strongly encouraged for all developments, as proportionate to the scale and type of development and its potential impacts (positive or negative). Such engagement should also complement work being undertaken on any Social Value and Health Impact Assessment (for more information see policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing).

BFN2.2	Newham considers that the most effective and inclusive method to undertake this engagement is by using a co-design process through which the masterplan can be developed and key aspects of the scheme can be designed. Participants in the process should include landowners, developers, residents in the surrounding area, local community organisations, local businesses, prospective users or managers of any social or community infrastructure provision and relevant statutory consultees. An engagement strategy should be submitted outlining how engagement has and will be carried out. This should identify which specific groups have and will be engaged, including a focus on engaging young people and a range of residents as diverse as the local population across all protected characteristics, and how they will be engaged. The strategy should be underpinned by the engagement principles contained within Newham's Statement of Community Involvement, be fully accessible, and include offline and online activities, the use of existing local events, innovative and fun activities and allow for long term engagement. A review of Newham's Statement of Community Involvement will be undertaken to provide more details regarding a definition of co-production in the context of masterplanning and best practice examples. For developments proposing meanwhile uses and for major development, the use of exploratory walks or participatory site assessments as part of the engagement with local community is strongly encouraged. To be most effective, these should seek to provide a range of opportunities targeted at different sections of the community that may have particular knowledge and concerns about the area (e.g. women and girls focus group or disability walking/wheeling tour), alongside mixed group engagement.

BFN2.2	The masterplan must consider and provide a strategy for how the required land uses and infrastructure will be delivered across the whole allocation or site, as well as appropriate phasing to ensure infrastructure is provided as it will be needed. For complex sites with the need for transport improvements or new transport provision, the applicant should evidence how an integrated approach to the delivery of transport infrastructure has been considered and outline the arrangements in place to ensure its timely delivery to benefit the existing and future population. The masterplan must demonstrate compliance with the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles provided in section 4. It should also evidence how the site's existing natural features, including trees, green spaces and water spaces have been incorporated into the design while appropriate mitigation for environmental factors such as noise, odour, air quality and flood risk have been incorporated, paying particular consideration to those land uses and users most vulnerable to these factors. Finally, the masterplan must demonstrate that the layout will optimise quality of life for residents in the new development, as well as those living alongside it, while protecting the economic function of any new and existing employment uses. The considerations listed in the policy are applicable to developments containing all land uses. Developments must consider all aspects listed in the policy and apply them, alongside any site or use specific constraints, taking into account the context of the site and its surroundings, both current and planned. Once the masterplan has been satisfactorily agreed by the landowner(s) and the Council, separate applications for individual sites may be brought forward.

BNF2.3	Delivering opportunities for social interaction can include well-designed communal amenity spaces and internal circulation space, as well as larger interventions such as the provision of community facilities or community growing spaces. Mixed, inclusive and stable communities will be achieved when an appropriate mix of tenures and sizes of home are provided (including specialist housing, where appropriate), enabling Newham's diverse community to live in suitable, long-term and secure housing in locations across the borough. Ensuring that developments meet the needs of, and do not exclude or displace existing, and especially disadvantaged, local communities is also key to achieving this objective. Incorporating active travel, active design and healthy streets principles, as well as providing green and tranquil spaces and well-designed homes all benefit physical and mental wellbeing. Recent engagement with young people in Newham has highlighted that young people often feel unsafe and unwelcome in public spaces in Newham. Masterplans must therefore demonstrate how the needs of children and young people will be met in and around the development. Masterplans should consider how a changing climate will be managed within their development, such as through layouts to reduce overheating, provisions of cool zones, sustainable urban drainage systems and/or flood prevention measures. In addition, whole life carbon considerations should be factored into masterplanning, by considering the possibility for, and benefits of, retrofitting existing buildings and the reuse of any existing materials on site.

BNF2.3	Newham is the most diverse borough in London, our buildings and public spaces must be designed to accommodate variation in family and social lives as well as considering different groups' feelings of safety and welcome. This could include larger homes for multigenerational living, variation and flexibility in the design of private amenity space and internal home layouts, facilities in the public realm for different types of games, festivals or socialising and the use of design features which incorporate global design practices and aesthetics. Finally, the masterplan must demonstrate how the scheme will deliver Community Wealth Benefits, such a creating spaces for local businesses, complementing, not undermining the vitality and viability of local retail and community facilities, and creating opportunities for community ownership and management. Further guidance can be found in the Borough Wide Design Principles chapter of the Characterisation Study. Specific interventions to deliver these objectives must be informed by the co-design process and respond to local needs. The masterplan document should evidence how these objectives have been delivered. The objectives listed in the policy are applicable to developments containing all land uses. Developments must consider all aspects listed in the policy and apply them, alongside any site or use specific constraints, taking into account the context of the site and its surroundings, both current and planned.
BNF2.4	As part of a phasing plan, applicants should identify parts of the site which will remain vacant or which will be underused for more than three years as the development is delivered. Underused parts of the site include those where existing uses may be continuing but which do not use the entirety of any existing buildings or plots.

BNF2.4	The Meanwhile Uses Strategy should aim to activate the site, establish connections with the wider community and build the identity of new developments and neighbourhoods. Appropriate meanwhile uses should be identified through co-design approaches so they reflect local needs, but could include homes (where the relevant policies in the Homes chapter are complied with), pocket parks, community garden, spaces for nature, including habitat creation, community facilities, pop up shops or markets, affordable workspace or makerspace. Meanwhile projects can help to engage on the permanent use of the site and test strategies for elements of the wider masterplan design such as wayfinding, lighting and local identity. Spaces can also be used as nurseries for plants which will be used in the final landscaping of the site. The provision of meanwhile uses on all or parts of the site may not always be feasible, for example where there are health, safety or amenity constraints that cannot be mitigated as part of the temporary proposals. Further, the meanwhile use activation should not prejudice the delivery of the final scheme, including the need to secure land for remediation or preparatory works. The Meanwhile Strategy should be provided on submission of the planning application. Meanwhile uses will be subject to their own planning processes and must comply with Local Plan Policy BFN1.8.
BNF2.5	Surveys should be completed more than 12 months and less than 24 months after full occupancy of the phase. It is expected that the survey should be conducted by an independent third party and achieve a proportionate response rate to ensure sufficient data quality and anonymity. The Council will develop a series of standard questions, which can be supplemented should the developer or management company so wish.

Evidence base

- Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)

Policy Links

Local Plan:

- BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing
- CE7: Managing flood risk
- J4: Delivering Community Wealth Building and inclusive growth
- T1: Strategic transport
- T2: Local transport
- CE1: Environmental design and delivery
- CE2: Zero Carbon development
- HS1: Newham's Town Centres Network
- D1: Design standards
- D2: Public realm net gain
- D3: Design-led residential site capacity optimisation
- D6: Neighbourliness
- GWS1: Green spaces
- GWS2: Water spaces
- GWS3: Biodiversity, urban greening, and access to nature
- GWS5: Play and informal recreation for all ages
- Section 4: Neighbourhoods

London Plan 2021:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- D3 Optimising site capacity through the design-led approach
- D5 Inclusive design



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

1. All developments in Newham should maximise social value and to make a positive contribution to the health and wellbeing of our communities.

2. Major development, and proposals where potential health or social value issues are likely to arise, must undertake a screening assessment as early as possible in the development process, to determine whether a Social Value and Health Impact Assessment (SV-HIA) is required.

3. Where the screening assessment identifies that a SV-HIA is required, then:
    a. the scope of the SV-HIA must be agreed with the Council's Planning and Public Health departments before it is undertaken by the applicant; and
    b. applicants will be required to prepare a proportionate SV-HIA as early as possible in the development process. This is to allow the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.

Justification

3.15 Newham has adopted a number of strategies which seek to put health, happiness and wellbeing at the heart of the work the council do. Newham's Health and Wellbeing Strategy (2024) sets out 50 steps to improve health and wellbeing over the next three years. The COVID-19 recovery action plan, 'Towards a Better Newham' is focused around 8 pillars of recovery which set out how the council will focus its attention as it emerges from the pandemic. Pillar 1 places health at the heart of the action plan: 'Our measures of success will be the health, happiness and wellbeing of our residents, rather than growth, productivity and land value'. The Council's Community Wealth Building Strategy seeks to tackle the injustices Newham's residents' face by focusing on poverty in the borough, as well as addressing the racial and gendered disparities that exists. In addition, it sets out how Community Wealth Building principals will be implemented as a key mechanism for responding to the climate emergency. The Social Integration Strategy introduces how Newham Council will approach issues of equality and how we can help achieved better links between residents to improve quality of life for all.

3.16 All development in Newham should be maximising social value throughout the lifetime of the development. The Public Services (Social Value) Act 2012 introduced a duty on local authorities to have regard for economic, social and environmental wellbeing in connection with Public Service contracts. Authorities must consider how what is proposed to be procured might improve the economic, social and environmental wellbeing of the relevant area, and how, in conducting the process of procurement, it might act with a view to securing such improvement. Social value is the delivery of positive social, economic and environmental impacts, which come from the actions of organisations. In particular, this means the effect on the local economy and the health and wellbeing of local residents. It is important to ensure that potential positive benefits are maximised from the development taking place in Newham. This can mean utilising local supply chains so money spent on developments stays in the local economy; and taking steps to recruit local people for the construction of development and in any resulting employment use.

3.17 A Health Impact Assessment (HIA) is a useful tool that helps to ensure that health and wellbeing is being properly considered in proposals. Newham's SV-HIA combines a traditional HIA with additional criteria specifically looking at the social value. There is a clear cross over between the delivery of social value and the criteria addressed in a HIA. It is for this reason Newham is bringing together the two measures in one assessment tool.

3.18 SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities.

3.19 A SV-HIA will give valuable information not only about potential effects on social value and health, but also how to manage them. It therefore provides the opportunity to amend the design of a proposed development to protect and improve social value and health. Changing a proposal as a result of a SV-HIA means that not only is its implementation more likely to promote social value and health, but it is also less likely to cause detriment to social value or ill-health in the community, with the consequential benefits for individuals and the wider economy.

Implementation

BFN3:1	Please see Newham's Social Value-Health Impact Assessment Guidance Note for support on when and how SV-HIAs should be prepared, the screening assessment and the SV-HIA checklist. The SV-HIA combines: • Social Value self-assessment: an approach used to judge the potential social value which can be added through the delivery of the proposal. • Health Impact Assessment (HIA): The World Health Organisation define a HIA as being "a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups" with the view that any recommendations made should aim to maximise the proposal's health benefits while minimising any negative health effects.
BFN3:2	The following developments will be expected to submit a Health and Social Value Impact screening assessment: i. Major development ii. Loss, gain or reconfiguration of social infrastructure floorspace iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops iv. Loss, gain or reconfiguration of publicly accessible green space v. Development impacting an existing or creating a new internal or external permanent market There may be other types of development, outside of those identified above, which Planning and Public Health officers consider may require a SV-HIA. Development will need to complete a SV-HIA screening assessment. The screening assessment will be submitted at pre-application stage. Through this process the need for a more detailed SV-HIA may be identified. The Screening Assessment will be reviewed by Newham's Public Health and Planning Teams. Any changes made as a result of the screening process should be recorded and an updated version submitted with any future planning application. Please see Newham's Social Value-Health Impact Assessment Guidance Note for support on the screening assessment.

BFN3:3

SV-HIAs can be done at any stage in the process of developing a planning application, but are best done at the earliest stage possible. The assessment should help to identify the potential positive and negative health impacts of the emerging development.

The scope of any SV-HIA must be agreed with Newham's Public Health and Planning departments. The assessment must be proportionate to the size of the development and must look at issues of social value and health in the round.

A SV-Applicants are encouraged to complete the SV-HIA checklist at the earliest possible stage of the development (e.g. at initial design stage or pre-application), so that the consideration of social value and health and wellbeing can meaningfully influence a development. Please see Newham's Social Value-Health Impact Assessment Guidance Note for the SV-HIA checklist and support on how to undertake the assessment.

Applicants are encouraged to think carefully about how their scheme can benefit the community over the lifetime of the development and adopt measures to achieve this. For example, employment generating developments could review their recruitment policies to ensure they are inclusive and/or promote flexible and accessible work placements to help people into work who might otherwise find it difficult for a number of reasons, such as learning difficulties, their ex-offender status or mental health issues.

Please see Newham's Social Value-Health Impact Assessment Guidance Note for support on the SV-HIA and to see the SV-HIA checklist.

BFN3:3

The following will be required as a minimum for development involving the loss, reconfiguration or reduction of a community facility or health facility:

- Details how to maximise the proposal's positive health and social effects and minimising its negative health and social effects.
- Engagement with all the relevant bodies / organisations involved in the provision of services.
- Evidence to demonstrate who uses the facility or former users (where the facility has declined or closed), including a description with regard to, but not limited to, protected characteristics (age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation).
- How the needs of the existing users, potential users (where the facility is not currently in use) or future users have been considered before making the proposals to the facility. Why the change to the facility is needed and how this best meets the needs of those using the service, potential users (where the facility is not currently in use) or future users of the premises/site or neighbourhood – subject to the planning application) which could reasonably be accommodated from the existing premises/site.

The following will also be required as a minimum for development involving the loss, reconfiguration or reduction of a cultural facility or sport or recreation facility:

- details that the impact of the proposal on the existing network of cultural and sport or recreation facilities in Newham is not significant; and
- details that the impact of any changes to the mix of cultural/sport or recreation uses being proposed on existing users and occupiers does not result in a deficit in the local area or borough; and
- information demonstrating the affordability of any reconfigured facility.

BFN3:3	The following will also be required as a minimum for development of new or re-provided cultural and sport or recreation facilities (including modernisation and/or expansion): • details demonstrating that the effect of the proposal on the existing network of cultural and leisure facilities in Newham will meet needs and add to choice and mix of cultural/leisure uses in the local area or borough; and • details of the affordability of any new facility; and • details that the proposal will reflect local cultural heritage; and • details as to how the proposal will ensure it is welcoming, accessible and inclusive, especially to Newham's young people, for example through commitment to participation in Newham's emerging Cultural Passport Scheme. Details should be provided of consultation with public (including details of the number and protected characteristics of those engaged) and community service providers, including Newham Council, to establish their needs and accommodation requirements.

Evidence base

- 50 Steps Health and Wellbeing Strategy, Newham (2024)
- 50 Steps Evidence base, Newham (2020)
- 50 Steps Evidence base, Newham (2024)

Policy Links

Local Plan:

- SI1: Existing community facilities and health care facilities
- SI2: New and re-provided community facilities and health care facilities
- SI3: Cultural facilities and sport and recreation facilities
- HS6: Health and wellbeing on the high streets
- J4: Delivering Community Wealth Building and Inclusive Growth

London Plan 2021:

- GG3 Creating a healthy city



Policy BFN4: Developer contributions and infrastructure delivery

1. Development will be required to:
    a. pay the Community Infrastructure Levy charges applicable to their land use and location; and
    b. as necessary, enter into Section 106 agreements to provide affordable housing and any other requirements to mitigate impacts arising.

2. Where a site is not proposing to meet all policy requirements or related obligations on viability grounds, applicants must:
    a. explore all available options (including review mechanisms, flexible trigger points or phased payment of contributions) to reduce the viability gap and secure much needed contributions; and
    b. submit a financial viability assessment. This assessment will be made public and subject to independent scrutiny at the applicant's cost.

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 other infrastructure.

4. Applications for developments at, or over, 250 units/hectare density or for major developments on site allocations will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development, through the provision of an Infrastructure Sufficiency Statement.

5. Vacant Building Credit is not expected to apply in Newham due to the potential it has to adversely affect our ability to meet our affordable housing need. In the exceptional circumstances it may be considered applicable, schemes must submit a financial viability assessment and must demonstrate:
    a. the site would otherwise not come forward for any form of redevelopment over the Plan period; and
    b. there are no extant or recently expired permissions on the site; and
    c. no part of any building on the site has been in continuous use for any six months during the last five years; and
    d. the building has not been vacated solely for the purpose of redevelopment; and
    e. the building has been marketed for at least 24 months prior to the point of application.



Justification

3.20 In order to ensure that the policies of the Local Plan are delivered in a way that achieves sustainable development, we will seek justified contributions from developers to fund affordable housing, local job access schemes, improvements to infrastructure and the environment. There are two main types of contribution: the Community Infrastructure Levy (CIL) and planning obligations (section 106 agreements). The levy applies a standard charge to most new developments, specified in the charging schedule and will be used to fund infrastructure needed to support the future growth of the Borough. Planning obligations are used to address the impacts of development and are secured during the planning application process.

3.21 As outlined in the Plan's vision, objectives and spatial strategy, building a fairer Newham relies on development which meets Newham's needs and the delivery of infrastructure which can support the level of anticipated growth and ensure current and future residents have access to appropriate facilities. We will work collaboratively with our partners to deliver the infrastructure necessary to support the growth and development identified within the Local Plan using contributions secured alongside other sources of available funding.

3.22 The Infrastructure Delivery Plan identifies the types of infrastructure required to support the anticipated growth in the borough. The Infrastructure Delivery Plan will be updated in consultation with both internal and external stakeholders, including other service areas and infrastructure providers.

3.23 Each year, we will publish an Infrastructure Funding Statement setting out how much CIL and section 106 income has been collected, how it has been spent and future spending priorities

3.24 Development coming forward on site allocations or at greater densities than anticipated through plan making are required to undertake additional assessments to ensure there is sufficient infrastructure to support the scale of development. As outlined in the Design chapter, a density of 250 units/ha or greater, is considered higher density in Newham.

3.25 The purpose of the Vacant Building Credit is to incentivise development on brownfield land. The nature of the land available in Newham and the housing market means that it is not considered that such an incentive is required. Newham has a local housing need of over 50 per cent genuinely affordable housing and as such should be optimising all opportunities to deliver genuinely affordable homes. For these reasons, the Affordable Housing and Viability Supplementary Planning Guidance (Greater London Authority, 2017) concludes that the application of Vacant Building Credit is unlikely to be suitable in London.



Implementation

BFN4:1

In order to comply with Part 1, contributions must be made in accordance with both the borough-wide Community Infrastructure Levy charging schedule, or any subsequent adopted version or successor regime for infrastructure funding; and the Mayor of London's Community Infrastructure Levy charging schedule, or any subsequent adopted version or successor regime for infrastructure funding.

Section 106 planning obligations will be sought for affordable housing and additional contributions where they are:

- necessary to make the development acceptable in planning terms; and
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Obligations will vary depending on the nature and scale of a development, its location and impacts. They may be sought financially or 'in kind' – where the developer builds or directly delivers the obligation. The planning obligations associated with different policies are included within the appropriate policy. Financial obligations may be subject to index linked uplifts. Obligations and conditions may be subject to monitoring fees in line with the Community Infrastructure Levy regulations.

BFN4:2

Applicants are expected to deliver all policy requirements and related obligations outlined in the Plan. In exceptional cases, a shortfall of contributions towards the provision of infrastructure or affordable housing (including, but is not limited to, schemes which do not deliver the 60% affordable housing requirement) may be justified on viability grounds. In line with Government guidance, the amount paid for land is not considered to be an exceptional reason to justify not meeting all policy requirements on viability grounds.

In such circumstances, applicants will need to provide clear and robust evidence, as early as possible in the planning process, through a detailed financial viability appraisal to justify any deviation from the policies set out in this Plan. The Council will work with applicants to consider available phasing and review options to improve the viability of schemes to secure further contributions.

Financial viability appraisals will be expected to comply with the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance or subsequent guidance and will need to demonstrate that:

- the policy requirements set out in the Local Plan combined with site specific circumstances would render the development unviable; and
- the wider benefits of the scheme would outweigh the loss of contributions; and
- the potential opportunities to defer, reduce or phase contributions have been fully explored; and
- the maximum viable level of obligations is being provided by the scheme.

The viability appraisal will be independently assessed at the applicant's expense.

BFN4:3	This viability hierarchy is provided to guide applicants and decision makers in the exceptional circumstances where proven viability constraints prevent the delivery of all policy requirements. Newham's policy priority is the provision of more social rent homes due to the needs of Newham residents for genuinely affordable, long-term, secure, rented accommodation. Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/ or additional sources of funding to enable the delivery of the required infrastructure may, where possible, be identified by the Council. The Council will also support the exploration of additional sources of funding to enable the delivery of the required infrastructure.
BFN4:4	The Infrastructure Sufficiency Assessment should consider all of the following: • The capacity, availability and accessibility of the existing infrastructure provision within the area of the development, using any relevant threasholds provided in relevent evidence base documents. • The commitments and anticipated projects outlined in the Infrastructure Delivery Plan, implemented planning permissions, other parts of this Plan and any more up to date infrastructure providers' service strategies and commitments. • The role of the development's land uses and financial and in-kind contributions to support reductions in existing gaps and address needs arising from the development. • The role of phasing to ensure infrastructure is provided alongside growth. The assessment should indicate where any gaps may still exist in delivering key infrastructure and make recommendations on how they can be overcome. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.
BFN4:5	Significant evidence will be required to demonstrate why Vacant Building Credit is needed to bring forward a development. If a scheme qualifies for Vacant Building Credit, it cannot also claim Community Infrastructure Levy relief through the vacancy test.

Evidence base

- Affordable Housing and Viability Supplementary Planning Guidance, Greater London Authority (2017)
- Infrastructure Delivery Plan, LB Newham (2024)
- Community Facilities Needs Assessment, Publica (2022)
- Built Leisure Needs Assessment, Strategic Leisure Limited (2025)
- Green and Water Spaces Infrastructure Strategy, Jon Sheaff and Associates with London Wildlife Trust (2024)
- Playing Pitch Strategy, KKP (2025)
- Sustainable Transport Strategy, Systra (2024)

Policy Links

Local Plan:

- J4: Delivering Community Wealth Building and inclusive growth
- T1: Strategic transport
- T2: Local transport
- T3: Transport behaviour change
- W3: Utilities and digital connectivity infrastructure
- H3: Affordable housing
- H4: Housing mix

London Plan 2021:

- DF1 Delivery of the Plan and Planning Obligations

DESIGN

3.26 The design process is key to delivering successful, people-focused places. Importantly, good urban design comprises the delivery of several components. It considers what buildings and the spaces around them look and feel like, and how usable, accessible and pleasant they are. A well-designed development will be inviting and easy to move through, with clearly defined public and private areas and easily identified functions for the different parts of the development. Good quality design will create development that feels safe and welcoming at all times of day and night, and will enhance the look, feel and functionality of the wider neighbourhood.

3.27 In order to deliver on a vision of cohesive, engaged, sustainable, happy and healthy communities, the design policies emphasise that all these aspects of design must be addressed throughout the whole process of design, from the development of the brief to post-delivery maintenance, and carried through into credible plans for implementation and management.

3.28 Recent and current planning activities continue to significantly shape the borough on both strategic and smaller sites. Over the last ten years Newham's population has grown by 30 per cent, and in the next ten years Newham will account for 30 per cent of London's population growth. It is therefore vital that such significant growth is supported by well-designed and high quality buildings and neighbourhoods. The policies in this chapter have sought to embed best practice approaches and lessons learned from development activity over the past decade.

3.29 While continuing investment has helped improve the overall opportunities for increases in the quality of life in the borough, inequality continues to be a significant problem. The design process for the built environment can play an important role in addressing components of the Council's Community Wealth Building and social integration agendas, through two key objectives. First, through an emphasis on achieving public realm net gain, which means developments must look beyond their boundaries and help enhance the quality of the public realm in the neighbourhood. Second, through setting design criteria tackling issues of accessibility and inclusivity, perceptions of safety and high density, and promoting integrated developments that avoid creating perceived or actual gated communities.

3.30 The design policies have built on, and should be read alongside, the Newham Characterisation Study (2024), which has identified what makes Newham special – its physical and social characteristics and potential for positive change. The Study provides further design guidance to help applicants to respond to, and integrate their development with, the character of local places. In some contexts the guidance promotes protecting and enhancing existing urban forms and the heritage or social values local people associate with these, while in others the character can evolve further or be more holistically transformed by masterplanned development.

3.31 Newham also continues its historic trend of being welcoming to diverse cultures, with 72.5 per cent of the population being from Black, Asian and other non-White-British ethnic backgrounds, and over 100 languages being spoken. We wish to promote design solutions that support our resident's cultural needs and enable social integration, particularly focusing on delivering high quality, diverse public realm (see also Chapter 8: Green and Water Space) and on residential standards (see also Chapter 7: Homes).

This section contains the following policies:

- **D1: Design standards**
- **D2: Public realm net gain**
- **D3: Design-led site capacity optimisation**
- **D4: Tall buildings**
- **D5: Shopfronts and advertising**
- **D6: Neighbourliness**
- **D7: Conservation Areas and Areas of Townscape Value**
- **D8: Archaeological Priority Areas**
- **D9: Designated and non-designated buildings, ancient monuments and historic parks and gardens**

Policy D1: Design standards

1. All developments should have regard to the Newham Characterisation Study (2024) and any further adopted design guidance/code or guidance supported by the Council, and apply all of the following qualities of good design where applicable:
    a. Create welcoming buildings and spaces that are well integrated socially, ecologically and physically into their neighbourhoods. Avoid creating isolated and disconnected places that are not easy to move through and around.
    b. Be of an appropriate scale, height, mass and form for its site, context and neighbourhood.
    c. In public realm and communal spaces, ensure clear sight lines and visual permeability to help feelings of safety, legibility and wayfinding.
    d. Be of human scale, with the relationship between streets and buildings supporting a comfortable pedestrian microclimate (in line with policies D2 and D4) and a positive, sociable threshold between public realm and private spaces.
    e. Integrate natural features and 'living-building elements' throughout the built environment (in line with Local Plan Policy GWS3).
    f. Promote a sense of enclosure and definition that supports the role of the public and communal space(s).
    g. Provide natural surveillance for public and communal spaces through overlooking from neighbouring buildings and/or activities taking place within the space.
    h. Design facades with a coherent rhythm of vertical elements (entrances, windows, balconies, building breaks) and clearly identifiable horizontal elements (bottom, middle and top).
    i. Integrate mechanical and electrical plant into the form and design of the building, or screened and integrated into the landscaping.
    j. Use high quality detailing and materials which are robust, help create a sense of place and ownership, reflects the intended function of the development and complements and enhances local context and character. Highway facing lower levels should be designed with a finer level of architectural detailing.

2. All developments should enhance the existing positive elements of local character and carefully consider opportunities to improve less successful urban forms, movement barriers and other local challenges.

3. Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings.

4. Temporary buildings that are likely to be used for three years or more (including years already in use) should be designed to a high standard, with particular attention to enabling accessibility, promoting active travel, providing high quality landscaping, and mitigating amenity impacts. The structure and materials should be designed for disassembly and reuse to support green and circular economy principles. The extension of a temporary permission will only be permissible in exceptional circumstances and where the quality of design and materials used is maintained over the extended timeframe.

5. The quality of design should be clearly demonstrated at application stage. Major developments fitting the terms of reference of the Newham Design Review Panel should be assessed by the panel and any community and/or youth design review panel appointed by the Local Planning Authority.

Planning Obligations

- Retention of architect, or architect oversight, to project completion will be secured where it is important to preserve the vision of the original masterplanned design quality in phased developments.

Justification

3.32 Good quality design, alongside comprehensive development and masterplanning, will help achieve successful human scale place-making that delivers new, distinctive, yet integrated and well-connected places. Research[7] shows that the cost of good design is minimal compared to the financial and other benefits that can be achieved through its delivery.

3.33 This policy imbeds the key principles of good design to make sure that they are addressed by every application, as proportionate to the development proposed. A wide range of best practice guidance and design research is available and has helped inform the policy. To complement these and help apply the key placemaking principles in the Newham context, the Characterisation Study (2024) provides additional information about what makes Newham's built environment special, its challenges and opportunities, and way in which design can contribute to protect, improve or redefine places in a way that creates inclusive, happy, healthy and sustainable network of well-connected neighbourhoods.

3.34 Design should not be 'off-the-shelf' but respond to an analysis of the local context so that it has the best impact and is sensitive to the positives and negatives of local character (natural, physical, social and cultural) and addresses the specific constraints and opportunities of the site. It should resolve and not repeat past mistakes. It should accentuate and integrate with high quality elements of the surrounding context without simply replicating it. This process must include consideration of aspects of sensitivity, including historic or heritage value as well as social value, and capacity for change and innovation as set out in Local Plan Policy D3.

3.35 The basic principles of good design are applicable as much to proposals for meanwhile uses, as more permanent ones. This is because temporary developments often prevail, and therefore have a significant impact on local townscapes and the realisation of wider community objectives.

3.36 It will also be important to establish a locally-responsive design by engaging early and repeatedly with local residents, participating in design review processes, and incorporating technical and financial details as suitable for the type of development and planning application. Loss of design quality through variation of design details after planning permission is granted must be avoided, including by considering early on the impacts of building method choices, and through provision for continuity of oversight of the project architect where relevant.



[7] Bartlett School of Planning (2002), the Value of Good Design; RIBA (2011), Good Design - it all adds up

Implementation

D1.1

Applicants should explain and justify their response to the components of good design set out in this policy within the Design and Access Statement where applicable (or pre-app documentation). The Design and Access Statement should demonstrate a thorough understanding of local character and how this has been imbedded in the design brief (design principles) for the site. The design guidance listed below should be a starting point in identifying aspects to address in scheme design. However, more detailed site based analysis, including public engagement and engagement with relevant Council services as relevant to the proposal (and highlighted through policies of this Plan), will also be important.

Employment-led developments are also expected to demonstrate how all design standards have been optimised in the context of the site and its surrounding current context and planned neighbourhood change.

Developments should be designed with regard to design guidance prepared by the Council, the Greater London Authority or other public sector partners. Currently this includes:

- Newham Characterisation Study (2024) – borough wide design principles, neighbourhood principles, and sites recommendations.
- Conservation Area Appraisal and Management Plans.
- For proposals including residential development: Greater London Authority (2023), Good Quality Homes for All Londoners London Plan Guidance – small site design codes, optimising site capacity: a design-led approach, Housing design standards (external design).
- For proposals within the Royal Docks and Beckton Riverside Opportunity Area (designated by the London Plan 2021), Royal Docks and Beckton Riverside Opportunity Area Planning Framework (2023) and associated documents.
- National Design Guide (2019)
- National Model Design Code (2021)

Further guidance in relation to the sub-parts of this policy are provided below, and complement the provisions of the above.

Social, ecological and physical integration:

Avoiding the creation of isolated or segregated communities is imperative. Design can aid social interaction and integration by addressing public realm safety concerns; ensuring positive public/private space relationships; and providing well located and designed non-residential uses and communal and public spaces that help facilitate social interaction. This also means developments should demonstrate:

- Understanding of the character of the wider neighbourhood, starting with the detailed assessment of the Newham Characterisation Study (2024) and undertaking further site analysis and public engagement as set out above.
- Assessment of the needs of different local people and application of inclusive design guidance such as (but not limited to):
  - LLDC, Inclusive Design Standards (2025), www.queenelizabetholympicpark
  - The British Standards Institution, PAS 6463:2022 Design for the mind – Neurodiversity and the built environment. Guide.
  - The British Standards Institution, BS 8300-1:2018, Design of an accessible and inclusive built environment
    Part 1: external environment.

D1.1

- Where the scale of the site permits, provision of connectivity and permeability through the site that enhances the functioning of the neighbourhood (in line with Local Plan Policy D2) while retaining secure access to communal and private facilities for residents of the development is expected. The use of gates (including timed gates), walls/fences, bollards and other hard barriers in the public realm will generally not be supported. Exceptions may apply for security reasons in the case of parks and sites requiring hostile vehicle mitigation measures, and these should be integrated into the design of the scheme in line with guidance set out in Local Plan Policies D2 and/or GWS1.
- Where it aligns with the spatial strategy of this Plan, the provision of non-residential uses that respond to wider neighbourhood aspirations and need will be required. The location of non-residential uses and public spaces should be carefully chosen to ensure they are legible and inviting to the wider neighbourhood. In line with Local Plan Policy HS1 Part 4 and the Characterisation Study (2024) section 9.2.1 'Provide Local Uses That Support 15-Minute Neighbourhoods' recommendations, non-residential uses should be clustered together and supported by adequate public realm to create hubs of local activity.

Mechanical and electrical plant:

Mechanical and electrical plant (excluding solar panels) should be satisfactorily integrated into the form and design of the building. Where excavation takes place, such plant should be located below ground. If separated from the main building, it should be enclosed and integrated with the landscaping scheme to protect the appearance of the building and the street scene, and avoid being overbearing on neighbouring uses, with careful attention to not generate extensive inactive frontages at ground level. Where combustion flues are necessary, having regard to Local Plan Policies CE2 and CE6, these should normally terminate above the roof height of the tallest building in the development and the

D1.1

immediately surrounding area to ensure maximum dispersion of pollutants. Where this is not possible, alternative measures to prevent nuisance fumes entering nearby buildings should be agreed by the Council.

Extensions and outbuildings:

Extensions should be subservient to and complement the scale and massing of the host building, and preserve amenity, in accordance with Local Plan Policy D6. Key features of façade detailing should be retained and continued, with the potential for innovation where the quality of design, materials and amenity is to a high standard.

Site-specific design codes:

Where the scope of the proposed scheme submitted to the Council is limited to the principle of development (i.e. – Outline parts of an applications, Permission-in-Principle Applications, or principle only pre-applications), the basic considerations of design in terms of masterplanning criteria must be addressed and safeguarded. An applicant may reasonably submit a design code for the site to fulfil this requirement where it:

- Addresses the basic design requirements in relation to the proposed parameter plans, including being co-designed with local communities in line with Local Plan Policy BFN2.
- Follows the process of the National Model Design Code (2021).
- Is in line with the design guidance prepared by the Council, the Greater London Authority or other public sector partners (as set out above).

D1.2 The Newham Characterisation Study (2024) has identified parts of the borough where the built environment is of a lesser quality, and areas with successful urban forms – see Chapters 3 (Functional Character), 7 (Opportunities for Change) and the relevant neighbourhood(s) in Chapter 8 (Neighbourhood Design Principles). This means that a detailed consideration of local context is required by new development proposals, with a careful scrutiny of elements that should be integrated and elements of context that should be improved (and not exacerbated or ignored).

D1.3 When developing the scheme's design, careful consideration should be given to security features so that they do not onerously impact on opportunities for creating quality public realm, including seating, shelter and greenery which contribute to the promotion of healthy, active lifestyles and social integration.

Secured by Design accreditation for the physical security features for buildings will be expected for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Early and on-going engagement with the Metropolitan Police Service's Designing Out Crime Officers (DOCOs) is encouraged to ensure the proposal can meet accreditation, and to understand what other teams should be engaged in the design and delivery processes - e.g. Counter Terrorism Security Advisors (CTSAs), the Traffic Management Unit (TMU) and/or the British Transport Police (BTP).

Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure).

D1.4 Temporary buildings may display a transient materiality, but the quality of the overall design should remain of a high standard. The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe of the development. Meeting highest possible accessibility standards, as set out in the implementation text of part 1 of this policy (Social, ecological and physical integration subsection), will be particularly important when the building is intended for public access or primarily services a section of the population with special needs.

The Design and Access Statement should provide information on the lifespan of materials used, including maintenance considerations, accounting for the possibility that the temporary use may persist for longer than three years. This detail will also need to be provided in support of applications to extend temporary permissions, including where the original permission pre-dates this Plan or where cumulatively the development would persist for longer than three years. This is to ensure that the quality of development is suitable for the intended duration. Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale.

An end-of-life action plan should be submitted to indicate the disassembly technique required and potential options for reuse of materials or the entire structure.

The end-of-life action plan should demonstrate that there is a reasonably good chance for reuse of materials and/or structure by addressing the following sections of the Circular Economy Supplementary Guidance (2022) of the London Plan (2021):

- A Circular Economy design approach statement (part 2.5); and
- A Bill of Materials (part 4.7)

D1.4	Reflecting the short lifespan of the development, partnerships/ agreements with other businesses or organisations to support reuse following decommissioning of the temporary building will be strongly supported.
D1.5	Proposals not accompanied by adequately detailed drawings or design codes coordinated with parameter plans will not be supported. Developments must ensure commitment to maintaining the quality of the development through future phases and detailed delivery. Loss of quality through variations, non-material amendments or approval of detail applications will be strongly resisted, having regard to the importance of preserving good design in order to create successful people-focused place-making that communities can trust will be delivered for and with them.





D1.5

The Newham Design Review Panel will generally review proposals for major new development that meets at least one of the following selection criteria:

- Development of 0.5 hectares or more.
- Development involving 50 or more new homes.
- Development of 1,000 m^2 floor space or more.
- Significant public realm schemes.
- Major infrastructure schemes such as bridges or tunnels.
- Development with a significant impact on a town centre.
- Development in a historically/environmentally sensitive area (e.g. the setting of conservation areas or other heritage assets, or affecting SINCs, or along waterways).
- Development with a particular importance to an area or community.

The design review process (including co-designing with communities) is most effective when it starts at an early stage in the planning process (RIBA project planning level 0-1), to identify and challenge strategic design assumptions, before design proposals become too fixed.

The Newham Design Review Panel will need to be satisfied that the design options presented highlight the process of assessing and imbedding the views of the community regarding local needs/ challenges, as expressed through early engagement and/or the community panel review.

As and when a community and/or youth design review panel is established by the Council, all major proposals will also need to be reviewed by this panel before progressing to the Newham Design Review Panel (where relevant).

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Building for a Healthy Life, Birkbeck et al (2020)
- Green Infrastructure Planning and Design Guide, Natural England (2023)
- Active Design Guidance, Sports England (2023)
- Inclusive Design Standards, LLDC (2019)
- The principles of inclusive design. (They include you.), Design Council (2006),

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- D3: Design-led site capacity optimisation
- H11: Housing design quality
- CE5: Retrofit and the circular economy
- T4: Servicing a development
- GWS3: Biodiversity, urban greening, and access to nature

London Plan 2021:

- D4: Delivering good design
- D5: Inclusive design
- D11: Safety, security and resilience to emergency

Policy D2: Public realm net gain

1. All new and refurbished public realm should be designed, managed and maintained to fulfil all of the below criteria:
    a. Reflect and complement the built, archaeological and natural character, and the history and culture of the site's immediate context and wider neighbourhood.
    b. Be inclusive, accessible, multi-functional, welcoming and interesting, promoting active travel and fostering community ownership and social integration.
    c. Support comfortable pedestrian movement of people through space, and be scaled appropriately to support any additional proposed landscaping and activation.
    d. Promote a feeling of safety through good design for all times of day and night. Surveillance solutions, such as CCTV, should be included only where necessary.
    e. Contribute to good local environmental standards, including by delivering biodiversity net gain and addressing urban cooling and flood risk.

2. All new-build developments and developments for a change of use that are either on sites with a street-facing boundary of at least 25m, or that are major residential developments, should make positive qualitative contributions to the public realm through the following:
    a. Creating well considered access points and routes through the site, based on an understanding of how the public realm in an area functions and how the access, layout, uses, scale and massing of the development can positively integrate with or enhance existing and foreseeable movement patterns; and
    b. Including in the site design process the context of existing and planned highways and public rights of way network directly adjacent the site, so it can be assessed and adapted together, through application of the Active Travel Zone Assessment (TfL) and London Plan (2021) Policy D8 and any relevant local design guidance and code; and
    c. Maximising green infrastructure within or abutting the public realm, including street trees; and
    d. In areas of deficiency of access to children's play space, major developments that generate an over-5s child yield at ten or above are strongly encouraged to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation; and
    e. In areas with high footfall such as major routes, public transport nodes and town and local centres, provision of public art and wayfinding installations are encouraged. The art/wayfinding installations should be designed to optimise safe, comfortable access to them during the day and at night.

3. All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL).

4. Non-referable major developments and minor residential developments of five or more gross new build units are also encouraged to make improvements to the wider public realm network within their neighbourhood.

5. A Public Realm Management Plan should be submitted for all applications providing qualitative and quantitative public realm net gains on privately owned land. This will be implemented through legal agreement for major developments. The management plan should address:
    a. the timescale and phasing for completion of the public realm relative to the delivery of the overall site; and
    b. all maintenance and management requirements of the public realm; and
    c. for new or retained public spaces in private ownership, how the function of the space is optimised in response to the full range of activities and user types, at different times of the day and night and different times of the year, implementing the principles of the Public London Charter.

Planning Obligations

- Development contributions will be secured from relevant developments towards the enhancement of the public realm. When enhancements of the public realm are to be delivered on-site, delivery timeframe(s) may be tied to the phasing of the overall development.
- Financial contributions towards maintenance of public realm enhancements on Highways land will be calculated in line with the Newham Highways the Net Present Value methodology – typically with a whole life cycle of 60 years for roads and 120 years for bridges and other highway structures. The maintenance obligation is calculated as follows:

  COMMUTED SUM = Mp/(1+D/100)t
  Mp = the periodic maintenance cost
  D = the Discount Rate (effective annual interest rate) %
  t = the design life of the development roads / structures.

- Security and safety contributions identified as a requirement via consultation with the Newham Community Safety Team and/or the Metropolitan Police Service and where linked to the nature of the development may be required.

Justification

3.37 Public realm is a common resource, but its quality can vary significantly between streets and neighbourhoods. For many people public realm is a key affordable space for social interaction and leisure and is therefore essential for health and wellbeing. Given the geographic spread of land available for development and in line with Community Wealth Building aspirations we want public realm investment to go beyond the boundaries of development sites and reach further into established neighbourhoods. By helping improve the public environment more widely, more people should feel comfortable, safe and included, broadening access to what their neighbourhoods have to offer.

3.38 The public realm has multiple roles. People rightly expect to be able to move freely and easily within an extended area, and the quality of public routes and public spaces should support a range of movement needs and options. This is a key issue in the borough, with physical barriers and urban structures designed for vehicle movements and industrial uses contributing to the creation of confusing or threatening environments and harsh 'edges'. Public spaces and streets should provide logical, clear, pleasant, safe and interesting connections between places for use by pedestrians and cyclists with a range of abilities, to encourage these more active and sociable travel modes. This will also require the relationship of such spaces to vehicle travel to be well managed, ensuring that car parking and road traffic does not dominate.

3.39 Within a sizeable, ethnically diverse and young borough such as Newham, it is also reasonable to expect a diverse range of public spaces that people can use in their day-to-day lives. Ease of access for all, features of interest and flexibility of use, including playability, de-cluttering of unnecessary street furniture and provision of seating, shade and shelter will be important design considerations.

3.40 Play space and green space are referenced in this policy because the way these are integrated into the site layout and their detailed design can make the difference between spaces feeling communal rather than publicly accessible, even in instances where wider access is intended as part of the scheme.

3.41 Well placed and designed green spaces will also add to sustainability (including flood risk mitigation) and health benefits (see also the Green and Water Spaces policies of this Plan). However, Newham has less green space than neighbouring boroughs (and 30% of it is of poor or fair quality), while experiencing higher population growth projections. While policies in the Green and Water Spaces chapter and site allocations in the Neighbourhoods section seek to retain the current level of access to green space per capita, this policy is complementary, by promoting greening of streets and squares , as well as the private and communal open spaces facing onto the public realm. This approach will also provide biodiversity benefits by joining up habitats across the Borough.

3.42 Incidental social and play spaces should also be designed in. Independent mobility is vital for the physical, social and mental development and health of young people. It is also intrinsically connected to equality and the everyday freedoms to access and occupy public space. In Newham, the quality of public realm close to home is even more important when our young people feel excluded due to affordability and distance barriers, compounded by low access to green space and playspace.

3.43 The Green and Water Infrastructure Study (2023) has identified that Newham has a significant shortfall in publicly accessible playgrounds compared with a rate of provision based on the 'Guidance for Outdoor Sport and Play' standard (which would equate to 91 Ha). Some of this shortfall can be addressed by creating additional provision on existing greenspace and some through the creation of new playgrounds in new developments. While requirements set out in the Green and Water Spaces chapter and site allocations in the Neighbourhoods section seek to retain the current rate of provision, this policy encourages the creation of additional playspace in the public realm to help address the shortfall compared to the Fields in Trust standard.

3.44 Safety and security considerations are vitally important for local people, and designers must look to understand the range of experiences shaping the perception of safety of local people and community groups, alongside designing in security measures to deter crime. Where safety is not well-considered and proactively and sensitively implemented, the end design can deter people from using the public realm, public transport and particular buildings, as well as affecting how comfortable they feel in their own homes and places of work. Some groups are particularly affected, such as women and girls, older people and people with a disability.

3.45 Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place and local identity and is a form of community infrastructure. Public art includes temporary installations and non-physical works such as soundscapes. Where appropriate, artworks can be incorporated into street furniture or other landscaping features so that a variety of community needs can be met. Artworks may provide shelter from the weather, include sensory elements and provide play opportunities.



Implementation

ALL	For the purposes of this policy, public realm is defined as including: • The network of highways and public rights of way, whether on land that is publicly or privately owned, and including planned commitments. For the purposes of quantitative net gain, the carriageway space of highways is excluded. • The network of green space that are or will be publicly accessible, whether on land that is publicly or privately owned – where green space (existing or proposed) are part of the site, Local Plan Policies D2 and GWS1 are complementary and must be considered together. • The network of open or covered/indoor spaces that are, or will be, publicly accessible, whether on land that is publicly or privately owned. This includes: public squares, commercial or community premise forecourts, bus stops, and station concourses. • Highways facing frontages and curtilage of listed and locally listed buildings. A public space is the part of the public realm intended to have more varied functions, beyond facilitating movement and connectivity–e.g. green spaces, squares, playspace, street markets. Where new green spaces are proposed that meet the size requirements set in site allocations or that meet locally identified deficiencies (see Green and Water Infrastructure Strategy (2025)), these will count towards fulfilling quantitative public realm net gain requirements of the site. Where new streets are proposed, space should be prioritised for active travel in line with Low Traffic Neighbourhood and child-friendly design principles, and should connect to and be a legible part of the wider hierarchy of streets. The carriageway and on-street car parking will not be considered towards quantitative public realm net gain. Pavements should be at least 3m wide and otherwise optimised for pedestrian comfort.

D2.1	Qualitative measures that enhance the function of existing public realm also count towards public realm net gain, and should help integrate existing and new communities. <u>Public realm character</u> The public realm in various parts of Newham reflects the character of the time they were constructed, and a number of areas in Newham have a long history of human activity dating back to Roman times (e.g. Romford Road route). Interventions should be sensitive to local character, including archaeology, while enhancing functionality and appearance. The Newham Characterisation Study (2024) provides further guidance on the character of major routes through the borough – see Chapter 3 (Functional Character) and relevant neighbourhood(s) in Chapter 8 (Neighbourhood Design Principles). <u>Public realm functions</u> Good public realm facilitates the inclusive movement of people, and it should be designed to be interesting, welcoming and provide opportunities for social interaction for a multitude of groups. In the context of this policy, emphasis is placed on pavements and pedestrian movement, and on cyclist movement, as well as the network of green spaces and other public spaces such as squares. Supporting active design through public realm interventions should be achieved by applying the principles of Healthy Streets (TfL), as indicated through the Active Travel Zone Assessment for the development proposed. Additional guidance that applies to both residential, mixed use and non-residential developments may be found in Sports England's 'Active Design: Creating Active Environments Through Planning and Design' (2023).

D2.1

Public realm scale

When public realm is intended to cater a range of functions beyond just the movement of people – such as rest, play, outdoor events, public transport access – the space should be appropriately scaled and integrated into the wider movement network to allow for ease of access, legibility, inclusivity and comfortable enjoyment of the additional landscaped feature(s). Design solutions should:

- Integrate movement desire lines and a sufficient movement 'lane' width (at least 2 meters, and preferably more), which should be kept free of obstructions. Together with,
- Sufficient space for the comfortable functioning of each additional type of public realm activation proposed, and adequate consideration of the interrelationships between activity types to allow for either clustering or appropriate transitions between these functions.

The Characterisation Study (2024) Chapter 9 Borough Wide Design Principles for foster ownership of the public realm highlight the importance of public square and green spaces of various scales within neighbourhoods. Developments which contribute to enhancement of existing squares in the borough, or creation of new ones (including through activation where the size of existing public realm allows) will be supported.

Public realm safety and inclusivity

The arrangement of buildings and other features within a development should be organised so that inclusivity and safety are promoted from the outset of the design process. Design can have a significant impact of creating environments that discourage crime and help people to feel safe.

D2.1

Design solutions should be optimised first and foremost before any additional security interventions are considered. Features of good design that promote safety and comfort include: imbedding the knowledge gained through local engagement (particularly with focus on under-represented groups such as women, young people, and people with disabilities); designing for multi-group activation (i.e. welcoming to and usable by a range of different demographics); good permeability and connectivity (i.e. creating choice of routes, while avoiding unnecessary connections such as back alleys); clear sight lines along key routes; adequate enclosure and natural surveillance from neighbouring buildings; and good quality context-sensitive lighting.

The British Standards Institute's BS 5489-1:2020 'Code of practice for the design of road lighting – Part 1 Lighting of roads and public amenity areas' should be considered. Lighting uniformity, coverage and consistency for longer distances should be balanced with the need to mitigate light pollution in line with Local Plan Policy D6.

Inclusive design guidance that can be used in the development of the scheme, in addition to those referred to under Local Plan Policy D1, include:

- Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure, Department for Transport (2021), which provides detailed guidance of public realm design for inclusive access for people with physical disabilities.
- PAS 6463:2022 Design for the mind – Neurodiversity and the built environment. Guide, British Standards (2022), which provides principles and guidance for public realm design for inclusive access for people who are neurodivergent.
- Handbook for Creating Places that Work for Women and Girls, LLDC (2024), which provides principles and guidance for public realm design to create inclusive environments for women and girls.
- Making London Child-Friendly guidance, Greater London Authority (2021), which sets out design processes that lead to inclusive, high quality formal and informal playspace.

D2.1	Early engagement with London Borough of Newham Community Safety Team and the Metropolitan Police Service in relation to major schemes will identify known safety concerns in relation to the site, and any need for security infrastructure. Where CCTV is proposed, a Data Protection Impact Assessment should be undertaken and form part of the site's Public Realm Management Plan (see Part 5 of this policy). <u>Public realm environment and microclimate</u> The presence of greenery should be optimised in line with the Plan's policies on Green and Water Spaces. The creation or enhancement of green corridors along streets, in line with the recommendations of the Green and Water Infrastructure Study (2024), is strongly encouraged. In addition to green infrastructure solutions, and especially where site constraints limit the ability to introduce planting on parts of the site's public realm, the choice of materials used should respond to environmental and microclimate conditions. This should include the consideration of thermal mass (minimising cumulative impact on heat island effects), permeability (to mitigate flood risk and surface water flooding in line with Local Plan Policy CE8), and air pollution sequestration, alongside durability and maintenance requirements.
D2.2	The policy application will apply in the following circumstances: • All major developments for mixed use or non-residential uses, on sites of any size where at least one highway-facing side is 25m or longer, or on corner sites of any size where one highway-facing side is 20m or longer. • All major residential developments (at least 10 homes), irrespective of the size and location of the site (i.e. including backland sites). • Minor developments for any type of use/mixed use on sites above 0.25ha where at least one highway-facing side is 25m or longer, and it is proportionate to do so.

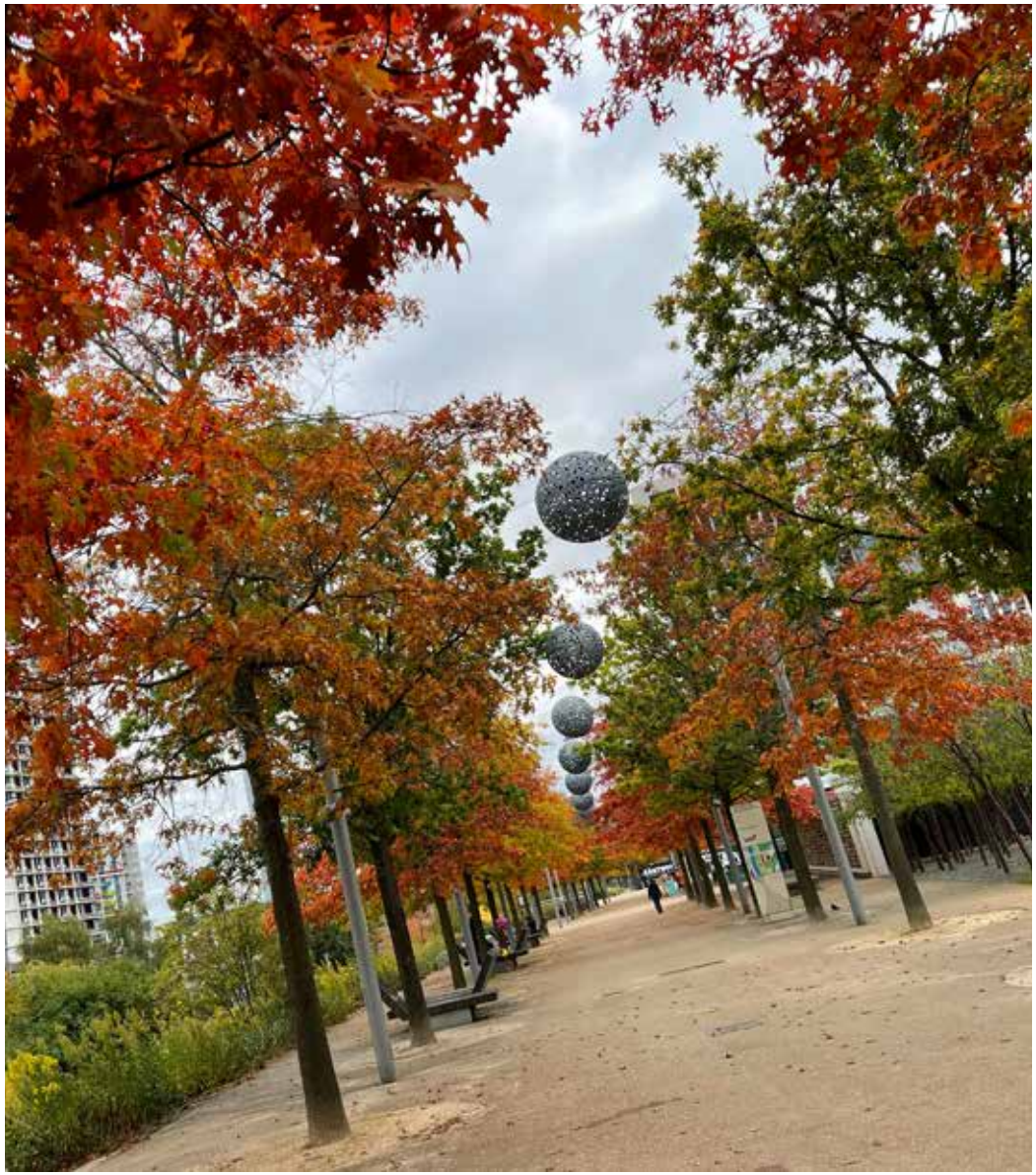
D2.2	In designing on-site public realm interventions, each of the design features below should be prioritised as relevant to the context of the site: • Greening (including through Sustainable Urban Drainage Systems): should be optimised everywhere. See also Local Plan Policies in Green and Water Space and Neighbourhoods section (and site allocations), as relevant to the proposed scheme. • Public secure short-stay cycle parking: should respond to local demand and primarily be directed to town and local centres and along other sections of major roads. See also Local Plan Policies T2 and T3. • Seating and shelter: should be addressed in line with Healthy Streets principle and the Active Travel Zone Assessment for the development proposed. • Play equipment or features, including play streets: should be directed to green spaces, within low traffic neighbourhoods, and public spaces/squares in town and local centres. Publicly accessible play space should be in a part of the public realm on site that is visible and easily accessible from the wider neighbourhood public realm. It should be designed to be welcoming, and avoid creating a feeling that the play space is intended only for the new residents. See further design criteria and guidance set out in Local Plan Policy GWS5. • Art installations (including murals): should be directed to town and local centres, along other sections of major roads that demonstrate high footfall, and in the setting of cultural or physical heritage (including known archaeological assets). Opportunities for public art in open spaces should be considered at an early stage to ensure that it is satisfactorily integrated into the design of development and applicants should work with artists and consult the local community at an early stage of design. Where possible, artists should be local to or have a connection to Newham or to East London.

These should be designed and positioned so as not to obstruct pedestrian or cycle movements, and to make a positive contribution to the character of the local area, including recognition of local cultural or built heritage assets. Where works of public art are sited in the public realm, their appropriate maintenance must be secured in perpetuity.

- Creative/interactive public lighting: should be prioritised in town and local centres, along major roads with high footfall (including underpasses and bridges), along public rights of way (including along waterways) and in the setting of cultural or physical heritage where it would protect and enhance its significance. The interactive/creative lighting should ensure it complements and broadly retains lighting uniformity, coverage and consistency for longer distances/routes.

The following set of guidance documents (or their subsequent updates) may be used to support the design of public realm interventions, alongside feedback received via representative consultation with local communities. These are in addition to the use of the guidance set out in Part 1 of this policy, Local Plan Policy D1 Part 1 and Local Plan Policies GWS1-4.

As and when any conflicts arise from the set of guidance, priority should be given to addressing inclusivity and accessibility (which includes consideration of feeling safe), while also recognising and balancing the different, sometimes conflicting needs of a range of people. Engagement with local focus groups on these matters may help identify the optimal solutions. Learning from post-occupation surveys on previous phases (or from comparable sites) may also provide valuable information for optimising design.



D2.2

Guidance document	When could it be useful	Description
Expanding London's Public Realm Design Guide, Greater London Authority (2020)	For all developments providing public realm net gains.	Provides principles and case studies for the integration of the public realm across a range of space types/functions. Advice on clutter, materials and maintenance.
Active Design Guidance, Sports England (2023)	For all developments providing public realm net gains.	Provides principles of landscaping and site layout that can support people to lead more active lives.
Streets for All: Advice for Highway and Public Realm Works in Historic Places, Historic England (2018)	For public realm interventions in the setting of heritage assets or within their curtilage. This broad guidance should be supplemented by any available locally specific guidance such as a Conservation Area Appraisal and Management Plan.	Guidance for implementing highways and other public realm works in sensitive historic locations.
Royal Docks Design Guides for Wayfinding, Lighting, Landscaping, Accessibility and Inclusivity, Royal Docks Team (2020).	For developments in the Royal Docks area – North Woolwich, Royal Victoria, and Royal Albert North neighbourhoods.	Locally-specific design considerations, and identification of local opportunities for art interventions.
Approach to Street Art Projects, London Borough of Newham (2023)	For developments incorporating art installations.	Guidance for council-led/managed projects that is recommended be adopted by all applicants. Sets out preferred methods of co-design with residents and criteria to demonstrate that the proposal reflects resident aspirations and cultural identity.
Public Realm Design Guide for Hostile Vehicle Mitigation, National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure) (2023)	When the site includes a use that requires hostile vehicle mitigation.	Guidance on successfully integrating Hostile Vehicle Mitigation features into a comprehensive landscaping strategy for the wider public realm.

D2.3 and D2.4

Step by step guidance on undertaking an Active Travel Zone Assessment is published by TfL, here.

Interventions which promote active travel will be prioritised, including safety interventions, activation of public spaces, and the creation of a coherent and consistent network of child-friendly routes – see guidance on public realm safety and inclusivity set out in Part 1 above.

Early engagement with London Borough of Newham Highways team should be conducted as early as possible to help identify suitable local projects for public realm net gain, including where contributions can be used to add value to existing programmes such as:

- Low Traffic Neighbourhoods public realm enhancements (Low Traffic Neighbourhoods include those by-design as well as those created through highways interventions).
- Child-friendly routes enhancement (including wayfinding) or creation, supporting (emerging) London Borough of Newham Highways 'Healthy Streets'/School Streets programme. The routes should make use of less busy, less polluted streets linking homes to schools, play spaces and other relevant social infrastructure in the area.
- Safety improvements, including passive design interventions to improve the perception of safety in a space, or supporting softer (non-physical) interventions.
- Bus stop accessibility measures.

D2.5

A Public Realm Management Plan must be submitted with the planning application. The management plan should outline:

- Any quantitative net gains in public realm floorspace, including through opening up access to previously inaccessible land, or delivering new streets, square and green spaces as part of the masterplan of a larger brownfield site.
- The qualitative net gains, including as part of relevant improvements to the network of highways adjacent the site.
- The proposed timescale and phasing for completion of the public realm interventions, relative to the delivery of the overall site.
- The maintenance and management requirements for highways retained in private ownership. The methodology for calculating the cost of upkeep, and including a suitable management budget for delivering the management plan, will be set out and agreed with the Council. It is recommended that maintenance costs should reflect the Newham Highways and/or Parks methodologies (as relevant to the public realm provided) – see relevant planning obligations section for methodology.
- Where public spaces are retained or proposed in private ownership, set out how the requirements of the Greater London Authority's Public London Charter are met and will allow for accreditation post-completion.

At pre-application stage, where relevant, a summary content for the plan should be submitted.

It is expected that the provisions of the management plan will be applied for the life of the development. If there are any changes, the local planning authority will need to be notified in writing. Any changes to management plans may require further consultation with relevant stakeholders.





Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Place Value Wiki (research database), Place Alliance
- Putting Health into Place: design, deliver and manage, Public Health England and Town and Country Planning Association (2019)
- Healthy Streets Explained, Transport for London

Policy Links

Local Plan:

- T2: Local transport
- T3: Transport behaviour change
- GWS1: Green spaces
- GWS3: Biodiversity, urban greening, and access to nature
- GWS4: Trees and hedgerows
- GWS5: Play and informal recreation for all ages
- HS2: Managing change within Town and Local Centres

London Plan 2021:

- D8: Public realm
- D5: Inclusive design
- T2: Healthy Streets



Policy D3: Design-led site capacity optimisation

1. All new-build (including mixed use) developments should apply the design-led approach, as set out in London Plan (2021) Policy D3, the relevant Local Plan Neighbourhood policies, and any relevant design guidance or code.

2. Major new-build developments should support compact urban block formats, Where residential uses are proposed, different dwelling types distributed across and within buildings should be provided, giving real choice to residents.

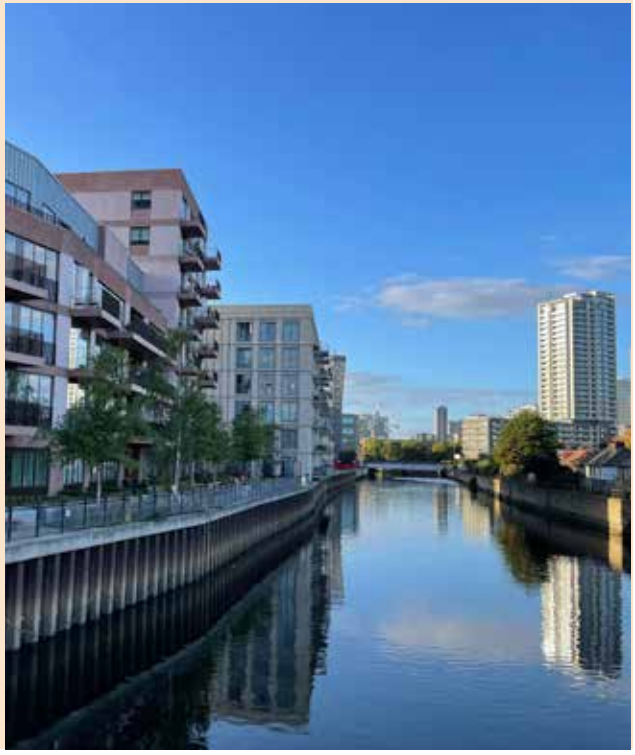
3. All new development and extensions should integrate with the wider neighbourhood grain, scale and massing. Density and height increases may be appropriate where it would respect local character and in line with Local Plan Policy D4.

4. In areas identified as suitable for transformation of character, all developments should remain attentive to the character of their neighbourhood and wider area and help create fully integrated neighbourhoods. This should be achieved through:
    a. the use of public realm connectivity, and massing and materials palette to reflect a recognisable character; and
    b. avoiding inward looking layouts and the creation of perceived barriers between old, recent and new developments.

5. In areas identified as suitable for enhancement of character, all developments should:
    a. deliver a moderate uplift in density through design which responds to the different character areas adjacent the site; and/or
    b. enhance the neighbourhood by responding to positive aspects of local character and by helping to address challenges.

6. In areas identified as suitable for conservation of character, all developments should:
    a. integrate with, and complement existing, built character, heritage and typologies; and
    b. when infilling or redeveloping a site in an existing urban block, reflect and complete the existing block structure. Where justified by the scale of the site frontage and the site context, building lines and setbacks may be changed to help create new public realm; and/or
    c. deliver a moderate uplift in density, which preserves character and sustains and enhances the significance of heritage assets.

7. Major residential developments where a density at or over 250 units/ha is considered appropriate for the site should ensure that:
    a. the design process addresses the servicing needs of residential and any non-residential uses proposed, from early stages of brief development; and
    b. quantitative public realm net gains are optimised for the intensity of use, and include a range of public spaces for multi-user activation along the length of the public realm; and
    c. a consistent, pedestrian-friendly prevailing building height is established at base level, in keeping with the scale of the street and heights of neighbouring buildings; and
    d. massing and landscaping contribute to ensuring a comfortable micro-climate and acoustic environment at street level and within communal amenity spaces.



Justification

3.46 Successful place-making and the creation of happy, healthy and integrated communities in Newham requires careful management of development: optimising it in relation to the strengths and opportunities of the site and its neighbourhood.

3.47 In line with the NPPF, this policy supports compact forms of development. A compact form of development is more likely to accommodate enough people to support shops, local facilities and viable public transport, maximise social interaction in a local area, and make it feel a safe, lively and attractive place. In this way, it may help to promote active travel to local facilities and services, so reducing dependence on the private car.

3.48 In line with the London Plan (2021), the Newham Characterisation Study (2024) has undertaken an analysis of the historic evolution, functional characters, urban morphology and socio-economic characteristics of the borough. These aspects are interpreted and evaluated to establish the capacity and likelihood for change for each part of the borough. The assessment reflects a granular survey of Newham at the level of the urban block, and results in mapping that divides the borough into three categories – conserve, enhance, and transform – which provide a framework to establish the intensity and type of change expected and suitable for each area. This process is based on an evaluation and assessment of character that is multifaceted and is not a designation or a rigid definition. It instead highlights in each area strengths, weaknesses and opportunities, contributing to establishing neighbourhood specific visions which reinforce, mitigate or address the positive and less successful characteristics highlighted in the Characterisation Study.

3.49 New developments in Newham are often delivered at higher density than the density of the neighbourhoods in which they are located. This policy aims to introduce clear quality criteria that must be met in order for high density development to positively respond to Newham's needs and aspirations, and particularly to ensure neighbourhoods can sustain health and wellbeing of residents throughout their life.

3.50 The London Plan (2021) promotes 'higher density' development in areas of opportunity and areas with good public transport accessibility level such as town centres. Higher density is identified as 350 units per ha. However, a recent study undertaken by London School of Economics (2023) provides a benchmark of 150units/ha as the start of 'super-density', and from '350 units/ha' as hyper-density'. A review of recent planning applications in Newham has highlighted a need for a locally-specific definition that better accounts for Newham's character. A density of 250 units/ha is considered appropriate.



Implementation

D3.1	In reaching the optimum density for the site, the design must follow the process and principles set out in the emerging Greater London Authority, Optimising Site Capacity: A Design-led Approach London Plan Guidance. The Newham Characterisation Study (2024), alongside any other locally relevant guidance (e.g. Conservation Area Appraisal and Management Plans) or design code should be used alongside London Plan (2021) guidance. The Design and Access Statement should demonstrate how the process has been followed and how the guidance has been integrated into the proposal. The preferred density of development on site should be justified including consideration of the mix of uses and mix of housing typologies (see relevant Local Plan Policies in the Housing section), and should be presented in a range of density calculation methods as recommended by London Plan (2021) Policy D3, including net Floor to Area Ratio (FAR).
D3.2	A compact form of development is more likely to accommodate enough people to support shops, local facilities and viable public transport, maximise social interaction in a local area, and make it feel a safe, lively and attractive place. In this way, it may help to promote active travel to local facilities and services, so reducing dependence on the private car. Therefore, the concept of a network of well-connected neighbourhoods integrates the idea of compact development which supports a multitude of local functions and creates sustainable networks of mixed use neighbourhoods. However, density/intensity and perceptions thereof will vary according to area character type and context. Use of a more small-scale urban grain can support diversity of buildings and provide opportunities for a range of dwelling types (and other use types where supported by the spatial strategy of this Plan), thereby making the development more inclusive and interesting.
D3.2	The Guidance Notes accompanying the draft National Model Design Code (2021) provides useful guidance about ways to deliver compact development (section B.1). See also design standards in other Policies of this Local Plan, as relevant to the uses proposed.
D3.3	In most context the grain, scale and massing of new development should follow the prevailing character and the streetscape of the existing built environment. Outside of Tall Building Zones, the height of new developments should not be above 21m from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements), and should be guided by the sensitivity of the character (to conserve or enhance character), and the prevailing height of the context. The presence of tall buildings shouldn't be used as justification for the area being appropriate for tall buildings. Further guidance is provided in the Newham Characterisation Study (2024), particularly under the relevant neighbourhood section in Chapter 8: Neighbourhood Design Guidance. See also the relevant Local Plan Neighbourhood policies, and site allocations where relevant.
D3.4, D3.5 and D3.6	'Conserve' areas are defined as areas that have a high quality and valued character that should be maintained. 'Transform' areas are defined as areas that have the conditions to establish a new character. 'Enhance' areas are defined as areas of mixed quality where new developments can provide positive enhancements to the overall character and moderate uplift in density as part of development.

D3.4, D3.5 and D3.6	Newham Characterisation Study (2024) Chapter 7 sets out in more detail the specific characteristics and design considerations for areas to be transformed, which are then presented at a neighbourhood level in Chapter 8. The design and access statement should set out how the specific 'transform' character of the site has informed the masterplanning and detailed design, having regard to the neighbourhood vision and any relevant site allocation requirements. All proposals are expected to make efficient use of land available through the design-led process. Any Design and Access Statement should address all the borough-wide design guidance themes relevant to a 'transform', 'enhance' or 'conserve' character of the site - making reference to relevant sections of the Characterisation Study, demonstrating how they have been addressed and balanced to contribute towards a successful, well integrated, healthy and functional neighbourhood. Proposals on small sites and/or minor residential developments should also refer to the guidance provided through the Small Sites Intensification Guidance, as well as relevant London Plan guidance. Where development seeks to alter the category that the site is attributed to through the Newham Characterisation Study (2024), this must be agreed through pre-application and independent design review processes. Evidence should be submitted that reflects the methodology outlined by the Characterisation Study (2024) Chapter 7 and provides a more detailed townscape analysis that may justify the change.
D3.7	Application of the above Parts of Local Plan Policy D3 will determine if the proposed high density at or above 250 units/ha is acceptable. Where the principal of high density development (250units/ha) is acceptable, the Design and Access Statement should demonstrate how the principle of public realm net gain and the servicing needs of

D3.7æ	the mix of uses and quantities proposed have been understood and secured in principle, starting from the early stages of brief development and carried through to the detailed design stage. For mixed use schemes density should also be calculated as net FAR, in line with the guidance set in the Newham Characterisation Study (2024). FAR should be used to understand perceived density of development, in addition to housing density. Special attention should be given to the microclimate and acoustic environment generated by the positioning, massing and façade detailing of buildings, for example by mitigating the creation of 'echo chamber' acoustic effects within courtyards[8], and addressing draft/ wind generation at entrances as part of the wider wind impact assessment. The Newham Characterisation Study (2024) provides further relevant design guidance under the borough-wide design guidance chapter. In designing the site, detailed consideration will be given to how the development integrates with the special characteristics of its locality. In high density developments, the public realm and communal spaces will need to be multi-functional and should be designed for the higher intensity of use and a range of functions (e.g. play spaces may also be Sustainable Urban Drainage Systems). The perception of overbearing high density should be avoided through: • Good permeability and connectivity, complemented by diversity in the public realm. Integration of a range of public spaces will be important, some designed for quiet and rest, other designed for higher intensity of activity such as sports, play or local events. • Maximising opportunities for a range of green infrastructure interventions.

[8] See for example, K Eggenschwiler et. al. (2022) 'Urban design of inner courtyards and road traffic noise: Influence of façade characteristics and building orientation on perceived noise annoyance'

D3.7

- Pavements designed for pedestrian comfort in line with expected footfall and supported by positive micro-climate. A consistent approach to, and design of, street features in town/local centres and other busy street areas supports usability for all street users, increases the confidence of disabled street users, and minimises feelings of discomfort and/or safety risks arising from conflicting or confusing design choices.

The Newham Design Review Panel should assess all high density proposals, in line with Local Plan Policy D1. The panel should be satisfied that the principles of good quality design, including housing standards, have been well balanced for the intensity of use (density) proposed. As and when a community and/or youth design review panel is established by the Council, all high density proposals will also need to be reviewed by this panel before progressing to the Newham Design Review Panel.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Inclusive Design In Town Centres And Busy Street Areas - Transport Scotland Research Report, WSP (2021)
- Living in a denser London: How residents see their homes, Fanny Blanc, Kath Scanlon & Tim White (2020)

Policy Links

Local Plan:

- D1: Design standards
- D2: Public realm net gain
- D4: Tall buildings
- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- H1: Meeting housing needs
- H11: Housing design quality

London Plan 2021:

- D1: London's form, character and capacity for growth
- D3: Optimising site capacity through the design-led approach



Policy D4: Tall buildings

1. Tall buildings in Newham are defined as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements).

2. Tall buildings will be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. To ensure that tall buildings contribute positively to a coherent townscape and a skyline which is sensitively integrated with the context, the heights of tall building developments should be broadly consistent with the appropriate heights set in Table 1 below, subject to meeting other relevant policy requirements. The height of tall buildings in any 'Tall Building Zone' should reflect the borough-wide spatial hierarchy.

   This will be achieved through:

   a. consolidating the tallest clusters of tall buildings in TBZ13: Canning Town, TBZ15: West Ham Station and TBZ19: Stratford Central, which have been identified as the areas of greater opportunity for growth due to their emerging context, district or local centre designation within Opportunity Areas (OAs) with a high level of accessibility;
   b. ensuring a sensitive transitions from the highest clusters to the lower and/or sensitive contexts while supporting the densification of larger areas within OAs with a high level of accessibility in TBZ18: Stratford High Street, TBZ13: Canning Town, TBZ15: West Ham Station and TBZ20: Chobham Manor/ East Village;
   c. supporting the densification of OAs which aim to improve public transport accessibility in TBZ5: Gallions Reach, TBZ10: North Woolwich Road and TBZ11: Lyle Park;
   d. managing height transitions in OAs constrained by airport proximity and sensitive contexts - whether low rise contexts or historic assets - in TBZ6: Albert Island, TBZ7: King George V/Pier Parade, TBZ8: Store Road, TBZ9: Royal Albert North, TBZ14: Manor Road, TBZ16: Abbey Mills and TBZ21: Excel West;
   e. marking key locations with tall elements within local or town centre designations with high accessibility to public transport in TBZ1: Forest Gate, TBZ2: Green Street, TBZ3: East Ham, TBZ4: Beckton, TBZ12: Custom House and TBZ17: Plaistow Station;
   f. supporting industrial intensification in SILs within TBZ4: Beckton, TBZ5: Gallions Reach and TBZ22: Thameside West.



Policy D4: Tall buildings

Table 1: Tall Building Zones

Tall Building Zone			Appropriate Height	Further guidance
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ1: Forest Gate	N15 Forest Gate	N15.SA2 Woodgrange Road West	32m (ca. 10 storeys)	• Prevailing heights should be generally between 9m and 21m (ca. 3-7 storeys). • Opportunity to include a limited tall building element of approximately 32m (ca. 10 storeys). • Height, scale and massing of development proposals should be assessed to conserve and enhance the significance of heritage assets without detracting from important landmarks and key views set in the Forest Gate conservation area appraisal and management plan, and Woodgrange conservation area appraisal and management plan.
TBZ2: Green Street	N14 Green Street	N/A	50m (ca. 16 storeys)	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements of approximately 50m (ca. 16 storeys). • Development should create adequate transitions with the low rise context and protect the microclimate of the market.
TBZ3: East Ham	N13 East Ham	N/A	32m (ca. 10 storeys) with opportunity for one tall building element at 50m (ca. 16 storeys) in the defined area.	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include tall building elements of approximately 32m (ca. 10 storeys). • Limited opportunity in the far north east corner to include a tall building element of approximately 50m (ca. 16 storeys) in the defined area. • Tall building elements should be limited in number and height, scale and massing should be assessed to avoid harm to the significance of relevant heritage assets. • Development should be mindful of height transitions when delivering higher densities.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ4: Beckton	N11 Beckton	N11.SA1 East Beckton Town Centre N11. SA3 Alpine Way	32m (ca. 10 storeys) and 40m (ca. 13 storeys) in the defined area.	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements of approximately 32m (ca. 10 storeys) to mark the centre of the town centre. • Opportunity to include limited tall building elements of approximately 40m (ca. 13 storeys) to mark Beckton DLR station. • Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology.
TBZ5: Gallions Reach	N17 Gallions Reach	N17.SA1 Beckton Riverside	32m (ca. 10 storeys) and 40m (ca. 13 storeys) and 50m (ca. 16 storeys) in the defined areas.	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 40m (ca. 13 storeys) in limited locations in proximity to Gallions Reach DLR station and the riverside to mark the neighbourhood parade, and approximately 50m (ca. 16 storeys) in limited locations in the proximity of the new town centre and DLR station. • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ6: Albert Island	N3 Royal Albert North	N/A	40m (ca. 13 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 40m (ca. 13 storeys). • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ7: King George V / Pier Parade	N1 North Woolwich	N1.SA2 Rymill Street	32m (ca. 10 storeys)	• Prevailing heights should generally be between 9m-and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements of approximately 32m (ca. 10 storeys). • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities.
TBZ8: Store Road / Pier Road	N1 North Woolwich	N1.SA1 North Woolwich Gateway	50m (ca. 16 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include limited tall building elements of approximately 50m (ca. 16 storeys). • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ9: Royal Albert North	N3 Royal Albert North	N3. SA1 Royal Albert North	32m (ca. 10 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 32m (ca. 10 storeys). • Subject to airport height constraints. • Scale and massing should reference the emerging context of Royal Albert Wharf, the Connaught Hotels and the Royal Albert Quay. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ10: North Woolwich Road	N2 Royal Victoria	N2.SA1 Silvertown Quays N2.SA3 Connaught Riverside	50m (ca. 16 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 50m (ca. 16 storeys). • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ11: Lyle Park West	N2 Royal Victoria	N2.SA2 Lyle Park West	60m (ca. 20 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 60m (ca. 20 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR. • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ12: Custom House	N5 Custom House	N5. SA1 Custom House - Land surrounding Freemasons Road N5.SA2 Custom House – Coolfin North	32m (ca. 10 storeys) and 50m (ca. 16 storeys) in the defined area	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include tall building elements of approximately 32m (ca. 10 storeys). • Limited opportunity for tall building elements of approximately 50m (ca. 16 storeys) to mark Custom House station and the link to the Excel conference centre. • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities.

Tall Building Zone			Appropriate Height	Further guidance
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ13: Canning Town	N4 Canning Town and N2 Royal Victoria	N4.SA1 Canning Town East N4.SA2 Silvertown Way East N4.SA3 Canning Town Holiday Inn N4.SA4 Limmo N4.SA5 Canning Town Riverside N2.SA4 Thameside West	50m (ca. 16 storeys) and 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in the defined areas	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys) in most of the site and between 9m and 21m (ca. 3-7 storeys) to the eastern part of the tall building zone. • In the north east of the Tall Building Zone, a limited number of tall building elements of approximately 40m (ca. 13 storeys) could be delivered subject to careful transition to the lower rise residential development to the east. • To mark Canning Town station and district centre, tall buildings, with elements of approximately 100m (ca. 33 storeys) are suitable in the defined areas. • In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of approximately 60m (ca. 20 storeys) and 100m (ca. 33 storeys), could be integrated carefully to aid wayfinding and mark special locations. • Subject to airport height constraints. • Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline. Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ14: Manor Road	N6 Manor Road	N/A	32m (ca. 10 storeys)	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements of approximately 32m (ca. 10 storeys). • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ15: West Ham Station	N7 Three Mills	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks	50m (ca. 16 storeys) and 32m (ca. 10 storeys) and 100m (ca. 33 storeys) in the defined areas.	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys), except in the immediate context of the listed gasholders where prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • In the immediate context of the listed gasholders, opportunity to include limited tall building elements of approximately 32m (ca. 10 storeys). • Along the railway line and Bow Creek (River Lea) and to mark West Ham station, opportunity to include limited tall building elements of approximately 100m (ca. 33 storeys), which are sufficiently spaced to allow for views and space around the listed gasholders. • In the rest of the Tall Building Zone, opportunity to include limited tall building elements of approximately 50 m (ca. 16 storeys). • Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set in the Three Mills conservation area appraisal and management guidelines. • All taller buildings should be integrated carefully to aid wayfinding and mark special locations. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ16: Abbey Mills	N7 Three Mills	N7.SA1 Abbey Mills	40m (ca. 13 storeys) 100m (ca. 33 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 40m (ca. 13 storeys) and 100m (ca. 33 storeys) towards the station, subject to careful transition to the Abbey Mills Conservation Area. • Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set out in the Three Mills conservation area appraisal and management plan, including the Abbey Mills Pumping Station. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces. • Development should be mindful of height transitions when delivering higher densities.
TBZ17: Plaistow Station	N9 West Ham and N10 Plaistow	N9.SA1 Plaistow North	40m (ca. 13 storeys) and 60m (ca. 20 storeys) in the defined area.	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys) on the north-western part of the site and 21m and 32m (ca. 7-10 storeys) nearer Plaistow Station and Local Centre. • Opportunity to include limited tall building elements of approximately 60m (ca. 20 storeys) to mark Plaistow Station. • Heights should reduce, with opportunities for limited tall building elements of approximately 40m (ca. 13 storeys) allowing for a sensitive transition to the low rise residential context to the north-west of the tall building zone. • Development including tall buildings in this zone must assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ18: Stratford High Street	N7 Three Mills and N8 Stratford and Maryland	N7.SA3 Sugar House Island N8.SA3 Greater Carpenters District N8.SA4 Stratford High Street Bingo Hall N8.SA7 Rick Roberts Way N8.SA8 Bridgewater Road N8.SA9 Pudding Mill	50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys), except at the sensitive edges of the tall building zone, where prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements of approximately 50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas. • Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number. • Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character. • Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views set in Stratford St John's conservation area appraisal and management plan and Sugar House Lane conservation area appraisal and management plan. • Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline. • Careful consideration is required for suitable locations of tall buildings, particularly south of the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			Appropriate Height	Further guidance
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ19: Stratford Central	N8 Stratford and Maryland	N8.SA1 Stratford Central N8.SA2 Stratford Station N8.SA5 Stratford Town Centre West N8.SA6 Stratford Waterfront South	60m (ca. 20 storeys) and 100m (ca. 33 storeys) and 32m (ca. 10 storeys) in the defined areas.	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys) except along the sensitive edge of the Broadway where prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include tall building elements of approximately 60m (ca. 20 storeys) in most of the Tall Building Zone. • To mark Stratford Station, Stratford International station, Westfield Avenue and the urban edge of Queen Elizabeth Olympic Park at International Quarter and the northern part of Stratford waterfront, a limited number of tall building elements of approximately 100m (ca. 33 storeys) could be provided. • Along the sensitive edge of the Broadway, heights should be reduced with opportunity for limited tall building elements of approximately 32m (ca. 10 storeys). • Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character. • Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views set in Stratford St John's conservation area appraisal and management plan. • Impacts on London View Management Framework (LVMF) views should be tested to ensure that tall buildings will result in no harm to the protected vistas. • Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.

Tall Building Zone			**Appropriate Height**	**Further guidance**
Tall Building Zone	**Neighbourhood**	**Site allocation(s)**		
TBZ20: Chobham Manor / East Village	N8 Stratford and Maryland	N8.SA10 Chobham Farm North	50m (ca. 16 storeys) and 32m (ca. 10 storeys) in the defined area.	• Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include tall building elements of approximately 50m (ca. 16 storeys) and 32m zone (ca. 10 storeys) in the defined area. • Development should be mindful of height transitions when delivering higher densities. • Impacts on London View Management Framework (LVMF) views should be tested to ensure that tall buildings will result in no harm to the protected vistas.
TBZ21: Excel West	N2 Royal Victoria	N2.SA5 Excel Western Entrance	40m (ca. 13 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include a tall building element of approximately 40m (ca. 13 storeys) to the west of the site. • Subject to airport height constraints. • Development should be mindful of height transitions when delivering higher densities. • Careful consideration is required for suitable locations of tall buildings, particularly along the water spaces, to avoid or minimise overshadowing that could negatively affect plant growth and the quality of water spaces.
TBZ22: Thameside East	N1 North Woolwich	N/A	50m (ca. 16 storeys)	• Prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys). • Opportunity to include tall building elements of approximately 50m (ca. 16 storeys). • Subject to airport height constraints. • Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology.

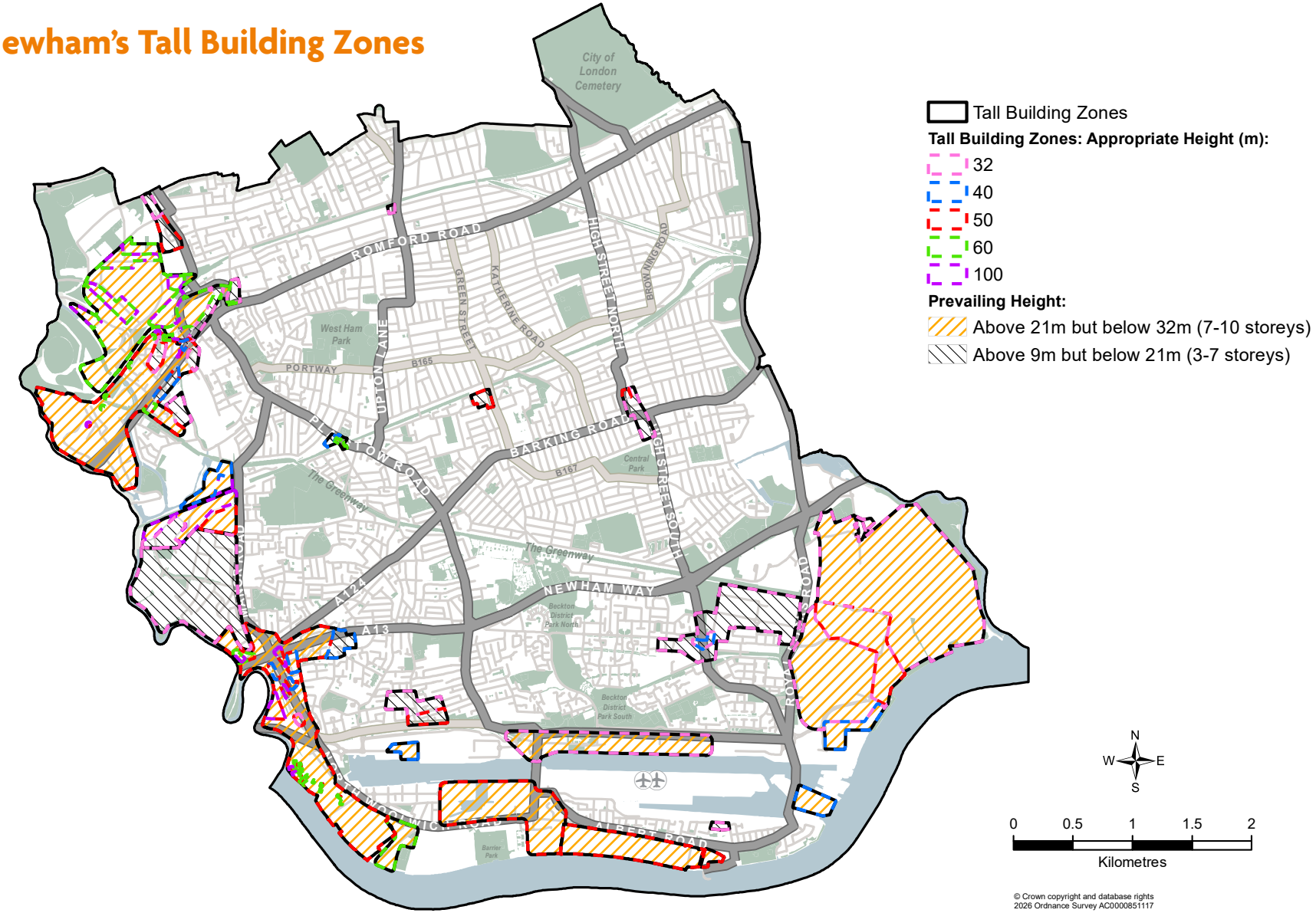
3. All tall buildings should be of high quality design and environmental standards, and:
    a. address the criteria set by the London Plan Policy D9 section C; and
    b. achieve exemplary architectural quality and make a positive contribution to the townscape through volumetric form and proportion of the mass and through architectural expression of the three main parts of the building: a top, middle and base; and
    c. address London Plan Policy D9 section D when tall buildings fall within designated town centres and public viewing galleries at the higher levels might offer an opportunity for a view across the borough and London; and
    d. be independently assessed by Newham Design Review Panel and any future Community and/or Youth Design Review Panel, appointed by the Local Planning Authority.

4. In addressing the relationship of the proposed tall building with its context:
    a. the footprint of tall building should help to define new green spaces and integrate the development with the existing urban pattern or establish new routes that reinstate historic urban grain; and
    b. the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street; and
    c. articulation and set-backs should be used to emphasise the relationship between the horizontal (street context) and the vertical (tall building), and to contribute to securing positive amenity spaces and a suitable micro-climate around the building.

5. Outside tall building zones, opportunities to increase density without tall buildings should be explored. Tall building developments outside tall building zones will be supported if they meet part 3 and 4 of the policy and if they meet the following criteria:
    a. be located in an area with a high level of public transport accessibility (PTAL 4-6) within a local or town centre, or in an Opportunity Area; and
    b. demonstrate they do not detract from important landmarks and key views set out in the adopted conservation area appraisal and management plans; and
    c. demonstrate they do not harm the protected vista set out in the London View Management Framework (LVMF); and
    d. demonstrate a positive contribution to the legibility of the tall building clusters identified in the tall building zones by transitioning from the height of the existing context to the appropriate height range of the adjoining tall building zone set out in Table 1; or
    e. demonstrate they can positively mark the presence of a local or town centre by aligning with the height of the tall building zones listed in part 2.e of the policy while managing the transition from the height of the existing context; and
    f. demonstrate that taller developments can make an exemplary contribution to the quality of the surrounding public realm and provide meaningful publicly accessible open space.



Map of Newham's Tall Building Zones



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Planning Obligations

- Free to enter publicly-accessible areas in tall buildings may be secured where in appropriate locations and in line with the policy requirements.

Justification

3.51 There are many positive aspects to tall buildings which make them an attractive part of a development. In the right context and with excellent architecture, tall buildings can help create distinctive, high quality places; offer the opportunity to build to higher densities, optimising development potential in light of local and strategic needs. They can also help cross subsidise affordable housing, and employment uses or community facilities in an intensely used and vibrant development that activates the surrounding area and makes new infrastructure viable. Finally, they can secure the redevelopment of small sites with high land values, or sites which need to accommodate green space alongside optimising housing delivery.

3.52 Conversely, a poorly designed tall building, or a tall building in the wrong place, may create an isolated mono-community with little social interaction within the building and with the wider community in the area. The economics of building a taller building with its higher service charges may not necessarily optimise the housing opportunities available to residents in the borough. There may also be problems of 'sense of ownership' and intensity of use of communal areas if not designed appropriately.

3.53 The location, scale and suggested height of each Tall Building Zone reflect the findings of the Newham Characterisation Study (2024) and the Tall Building Annex (2024). The 22 tall building zones cover significant areas of transformation within the three opportunity areas (OAs) and include the majority of the site allocations, reflecting their status as 'transform' areas of the borough. Tall Building Zones reflect an assessment exercise undertaken to identify suitable locations for tall buildings. This was informed by a townscape sensitivity screening assessment and suitability scoping exercise. Suitable locations have been identified based on an assessment of existing and emerging heights, proximity to public transport, and the impact on open space and heritage assets. The opportunity for growth and the constraints identified through the assessment have informed the tall buildings spatial hierarchy, which establishes different roles for different parts of the borough and considers the importance of Town and Local Centres as the heart of their neighbourhoods.

3.54 Areas within OAs, within Metropolitan and District Centres, with the highest level of public transport accessibility and with emerging clusters of tall buildings, have been identified as the areas of maximum capacity in the Borough. The other Tall Building Zones are identified as subservient to the three key locations in Stratford, Canning Town and West Ham. Other tall building locations are considered suitable to support densification with tall building forms that are in keeping with the context and that are mindful of lower public transport accessibility, the proximity to heritage assets, a low-rise context and the airport. The tall buildings strategy supports industrial intensification in all Strategic Industrial Locations (SILs) and supports the densification of key locations with a high level of public transport accessibility in proximity to stations and within town centre boundaries.

Implementation

D4.1	The definition of tall buildings in Newham is in line with the definition of the London Plan 2021. A tall building in Newham is any building over 21m measured from the ground to the top of the highest storey of the buildings (excluding any required and appropriately designed parapets, roof plants, equipment or other elements). Recognising that using storeys provides a simple way to illustrate height, an indicative estimation of number of storeys, which could be achieved, is provided for explanatory purposes only, with the assumption of a typical residential floor-to-floor level of 3m. As it is recognised that storey heights vary between land uses and constructions methods, the tall buildings definition covers all buildings of 21m, irrespective of use and related floor-to-floor height.

D4.2	Designated Tall Buildings Zones are identified in the Policies Map. The Tall Building Zones Map identifies the appropriate heights and where the prevailing height of new developments could be between 9m and 21m and where the prevailing height can exceed 21m, but should generally be below 32m. The varying heights across Tall Building Zones allow for transitioning heights to surrounding context and sensitive areas. A Tall Building Zone designation does not mean that all development within it can or should be delivered as tall buildings. Masterplanning, townscape and skyline analysis, alongside technical performance, will be required to demonstrate added value of new tall elements. The height of the context alone cannot be considered justification for new tall buildings, nor justify new buildings matching or exceeding the height of existing and committed development. A cluster of tall buildings has already been established in N4 Canning Town, creating a distinctive skyline marking Canning Town District Centre. New tall buildings should be below established heights and help address the spatial hierarchy of the local and wider context, including the neighbouring tall building zones in Tower Hamlets and the immediate low rise context. Therefore, addressing microclimate, skyline and wayfinding considerations of the cluster as a whole is essential. In N18 Stratford and Maryland an uncoordinated collection of tall buildings prevents the legibility of the cluster's coherence. Development within defined tall building zones should establish a spatial hierarchy and the role of different clusters around Stratford Station, Westfield Avenue and the urban edge of Queen Elizabeth Olympic Park at International Quarter and Stratford waterfront. New tall buildings should therefore be below established heights and address microclimate, skyline and wayfinding considerations of the cluster as a whole.

D4.2	The Tall Building Annex (2024) provides in more detail the borough tall building spatial hierarchy that should be address when delivering tall buildings. The Newham Characterisation Study (2024) borough-wide design guidance includes tall building design considerations more generally, which should also be addressed. Development of tall buildings outside of the Tall Building Zones will be considered a departure from the plan, unless they meet the criteria for tall buildings outside Tall Building Zones identified in part 5 of the policy.
D4.3	London Plan Policy D9 section C sets out a comprehensive list of criteria for tall buildings to meet which addresses visual, functional, environmental and cumulative impacts. All of these should be demonstrated in a tall buildings section of any Design and Access Statement, with sufficient detail to undertake a full assessment under every consideration. To inform early pre-application discussions, a methodology paper for the technical assessments and a list of design principles should be provided. <u>Visual impact:</u> Development proposals within tall building zones and in close proximity to 'conserve' areas should address visual impact on the surrounding context and avoid harm to the significance of heritage assets and their settings. Tall buildings should conserve and positively contribute to the character of an area without detracting from important landmarks and key views set out in the London View Management Framework (LVMF) and in adopted conservation area appraisals and management plans. Developments with tall building elements in close proximity to heritage assets, conservation areas and areas of townscape value should also address Local Plan Policies D7 and D9.

D4.3

Functional impact:

Due to their higher occupancy density and larger access and servicing requirements, tall building developments could have a greater impact on the public realm and highway and transport network as well as greater safety implications. The impact of new development with tall buildings should be carefully considered and minimised and should be addressed alongside other policies of the Local Plan, including BNF2, D6, T1 and T4.

Environmental impact:

As set out in Policies GWS2 and GWS3, tall buildings should also assess the consequent impact on green and water spaces. Development proposals for tall buildings should avoid or minimise overshadowing, which can negatively affect plant growth, as well as the quality of existing and proposed public open space, including water spaces.

Development with tall buildings in locations within Source Protection Zones (SPZs) should preserve the groundwater resources. If piling in contaminated and layered ground is necessary, the development should manage the risks on groundwater flow and contamination.

Microclimate considerations include:

- Daylight and sunlight penetration - assessed for buildings as per standards set in Local Plan Policy D6, and for outdoor spaces assessed for seasonal pedestrian comfort in line with guidance set by the Newham Characterisation Study (2022).
- Wind and air quality – as per Policy CE6 and in line with the Newham Characterisation Study (2024) guidance for 'Modelling for Air Quality Improvements'. Developers are encouraged to address wind microclimate issues at an early stage in their plans by appointing experienced consultants, discussing with planning officers and commissioning early-stage studies to quantify the wind microclimate conditions. Wind tunnel or computational fluid dynamics testing may be required where the tall building:
    - is at least twice the height of prevailing surrounding buildings,
    - or includes/effects sensitive pedestrian activities (e.g. public spaces, high streets and town centres, transport hubs, etc.),
    - or is located on an exposed location (e.g. edge of Thames),
    - or would create or add to a cluster of tall buildings.

- Temperature and humidity conditions around the building – will be assessed for seasonal pedestrian comfort in line with Transport for London guidance for Healthy Streets.
- Noise – assessed as per standards set in Policy D6.

A combined assessment of wind, sunlight, temperature and humidity conditions at different times throughout the year is recommended to facilitate an understanding of perceived thermal comfort at pedestrian level.

Cumulative impact:

Modelling should be undertaken of the full cluster of tall buildings proposed, taking account of the existing and emerging context, and where relevant at stages of the phased delivery, together with any landscape temporary measures necessary to mitigate temporary impacts in interim phases.

When designing development with tall buildings, careful consideration should be given to the location and massing of each building to ensure integration with the context and a positive contribution to the skyline.

D4.3	The mass should step down in response to surrounding scale and building typologies, and be raised where taller elements would have minimal impact on open space and sensitive context, unless otherwise specified in the policy. Tall buildings are composed of three main parts: a top, middle and base and each of these elements should be designed, articulated and distinguished in order to provide visual interest and a proportioned composition. The top contributes to the skyline's character in long distance views, therefore its roofscape design and materials used should reflect the role of tall buildings in the context. The design of the top should also integrate and conceal any mechanical and technical equipment, through raised parapets or plant screens, to minimise visual impact from the street level and from surrounding taller buildings. The design of the base should integrate the building with the surrounding scale and character, and create a positive sense of arrival at street level, providing active frontages – not a main town centre or social infrastructure use, unless supported by other policies – and framing the public realm. The middle part plays a decisive role in determining the appearance of the building and it should be designed articulating a proportionated pattern of openings, balconies, recesses and framing details. Bolt-on balconies at higher levels should be avoided. The London Plan Policy D9 section D promotes the incorporation of free to enter publicly accessible areas, and particularly viewing platforms at higher levels. In Newham, these would be considered appropriate in town centre locations. Where roof terraces and gardens are publicly accessible, entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Security implications should be considered at the design stage of the development, including making provision for security checks within the development, where required.

D4.3	Opening hours may need to be managed, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels or result in unacceptable light spillage in areas with residents or other sensitive uses. The Newham Design Review Panel should assess all tall building proposals. Once a Community and/or Youth Design Review Panel is established by the Council, tall building proposals must undergo review by this panel(s) before advancing to the Newham Design Review Panel. The Newham Design Review Panel will ensure that the presented design reflects the views of the Community and/or Youth Design Review Panel.



D4.4 Due to their scale and their servicing requirements, tall buildings could negatively impact the streetscape and disrupt the permeability of the urban block. Therefore, tall buildings should be carefully integrated within an existing network of streets or use their footprint to define new public realm. The design of the ground floor of tall buildings, whether stand-alone or integrated with a shoulder building, should prioritise the definition of high-quality public realm, re-establish building lines and reinstate historic street patterns, especially when in proximity to 'conserve' areas.

Development proposals for tall buildings in immediate proximity to conservation areas and other designated heritage assets should particularly address streetscape, including street width and building alignment, and respond to the scale, grain and character of the existing built environment. Tall buildings should generally be integrated with lower rise buildings to mediate the scale and help generate an adequate sense of enclosure. Enclosure is best achieved through a 1:1 ratio, with the height of the base/shoulder building directly proportional to the width of the street, to create a place that is comfortable for pedestrians.

The base of tall buildings plays a key role in framing the public realm and should provide active frontages at ground floor level, not a main town centre or social infrastructure use, unless supported by other policies, and be designed with particular attention to detail and in a way that directly responds to the character of the street.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Tall Building Annex (2024)
- London View Management Framework (LVMF)

Policy Links

Local Plan:

- D1: Design standards
- D2: Public realm net gain
- D3: Design-led residential site capacity optimisation
- D6: Neighbourliness
- D7: Conservation Areas and Areas of Townscape Value
- D9: Designated and non-designated buildings, ancient monuments and historic parks and gardens
- GWS2: Water spaces
- GWS3: Biodiversity, urban greening, and access to nature
- H11: Housing design quality
- Section 4: Neighbourhood

London Plan 2021:

- D3: Optimising site capacity through the design-led approach
- D9: Tall buildings
- D11: Safety, security and resilience to emergency
- D12: Fire safety

Policy D5: Shopfronts and advertising

1. Shopfronts and signage incorporated within frontages should be designed in a way that maintains active frontages and that meets all of the following criteria as relevant to the proposal:
    a. Respects and enhances the character of the streetscape through use of proportions, materials and details that seek to integrate and create a consistent pattern.
    b. Respects the architectural proportions and elements of the host building , including the restoration of lost features such as stall risers and fascias. Where a business occupies more than one unit, or includes mezzanine/ upper floors, each frontage should be treated individually, linked visually by a common design and materials palette that does not obstruct architectural features of the building.
    c. Principally retains visual permeability through the ground floor shopfront by minimising signage and carefully addressing the visual impact of security measures, louvers, shutters and any integrated plant equipment.
    d. Facilitates wheelchair access through the location and size of any entrance, and forecourt space decluttering. Subdivision of shopfronts will not be supported where it does not allow for this criteria to be met.
    e. Creates a unified, decluttered look of the overall shopfront through careful choice of materials, colours and patterns.
    f. Inset entrances on shopfronts are transparently glazed and well-lit.

2. Advertisements including hoardings, illumination of hoardings, illuminated fascia signs, free-standing display panels and digital displays that require consent should:
    a. be sensitively designed in terms of their scale, location and level of illumination to make a positive visual impact on the host building or structure and on the street; and
    b. singularly and cumulatively avoid becoming excessive and harming the local amenity, including through inappropriate illumination, in line with Local Plan Policy D6.



Justification

3.55 Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features. A number of high streets also have shopfronts of heritage significance, either by contributing to the significance of a Conservation Area or Area of Townscape Value designations, or where the buildings themselves are designated or non-designated.

3.56 Not all types of advertising require consent from the Council – a helpful guide was published by the government (available from publishing.service.gov.uk). Advertising should not be of a size or sited so that it appears brash, over-dominant or incongruous either on its own or cumulatively. With digital display technology increasingly playing a part in advertising, street scene and amenity impacts from artificial light and use of moving/changing picture displays also needs to be addressed. One sign on its own may have a minimal impact on the street scene however many signs may have a negative impact and create confusing environments, particularly for photosensitive people.

3.57 Advertisements above ground level are detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features.

Implementation

D5.1	Shopfronts should be engaging and help promote activity on high streets. Shop signage should generally be limited to the strip above the main shopfront and below the upper floor, plus one projecting sign at the same height. Required security measures should be designed to limit their visual impact on shopfronts, and where possible should be internal. Where shutters are necessary, they should be perforated to enable visibility into the shop and passive surveillance. On new developments, internal shutters are preferable, and shutter boxes should be designed in from the outset to avoid them being added retrospectively. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. At least 50% of the shopfront glazing, and preferably a higher percentage for the doorway(s), should retain transparency during hours of operation. Any shutters used during closing times should also retain a good level of visibility into the unit (e.g. use of perforated shutters). The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront. Accessibility of shopfronts/entrances should apply Building Regulations Part M for non-residential, which normally only covers new-builds and extensions, but every opportunity should be taken to enhance accessibility of Newham's high streets.

D5.1	Any plant equipment integrated into the shopfront should be positioned for easy access for maintenance. The design and materials used should help minimise the visual impact of the plant equipment and unify the overall elements of the shopfront. Ventilation through louvers in the shopfront will normally not be supported. In new build premises, systems for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells, noise and emissions adversely affecting neighbours, in line with Local Plan Policy D6. For changes of use developments, applicants and/or occupiers should investigate the potential to vent emissions to the roof. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of noise, smells or other emissions. Other ventilation louvres should not be sited by adjoining footways.
D5.2	Advertisement Consent applications will be assessed on the basis of accurate drawings or photo montages of the wider street frontage showing location and type of existing shopfronts and advertisements – at least 25m in either direction, and including the adjacent frontages. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriately scaled and located to integrate into the frontage and maintain its transparency, and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Advertisements above ground level will not be supported.

D5.2

Applications for advertisements in a conservation area must also conserve or enhance the character and appearance of that area.

The erection of a new sign or advert of any size on, or attached to, a listed building would almost always require listed building consent as it is very likely to be considered an alteration that affects its character as a building of special architectural or historic interest. Advertising consents on or attached to listed buildings will also be assessed against Local Plan Policy D9.

Hand-painted signs are easily implemented and relatively affordable. They provide the greatest scope for individuality and are especially suitable where traditional character is important. So too are hanging signs. These can be suspended from the fascia or above. Applicants should seek to retain and restore any original signage of historic merit.

Applicants are strongly encouraged to address the potential impact of the advertisements on people with disabilities. Use of fonts, colours and patterns should support legibility by people with visual impairments or who are neuro-divergent, making use of best practice such as:

- Accessible Maps, Images and Signage, Royal National Institute of Blind People (2020)
- Wayfinding guidance contained within, PAS 6463:2022 Design for the mind – Neurodiversity and the built environment, British Standards (2022).
- Signing and information chapter of Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure, Department for Transport (2021).

D5.2

Use of flags and banners on building frontages for advertising will not normally be permitted.

Hoardings should be sensitively designed, with consideration to their impact on perception of safety. Frontages longer than 25m should be broken up with areas of transparency, where the security of the site permits. The inclusion of art/murals as part of the hoardings is supported and should be delivered in line with the guidance set out in Local Plan Policy D2.

The illumination of advertisements should be discreet and incorporate LEDs and/or other technology to reduce the overall bulk and energy use of signage. Particular care will be necessary with advertisements within the setting of heritage assets. Internal illumination of advertisements in such areas will not normally be permitted.

The illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements, including a maximum value of luminance of 1000cd/m^2 anywhere on the surface of an advertisement at any time during the night.

Context-sensitive and biophilic lighting of shopfronts and advertising is encouraged.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)

Policy Links

Local Plan:

- D1: Design standards
- D6: Neighbourliness
- HS2: Managing change within Town and Local Centres
- HS4: Markets, pop-ups and meanwhile uses
- HS5: Visitor evening and night time economy

London Plan 2021:

- D8: Public realm



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Policy D6: Neighbourliness

1. All development is expected to achieve good neighbourliness from the outset by avoiding negative, and maximising positive, social and environmental impacts of its design and function on neighbours on and off the site. This includes a requirement to:
    a. create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime; and
    b. avoid unacceptable exposure to light pollution (including light spillage), odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants; and
    c. ensure adequate access to daylight and sunlight; and
    d. minimise impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties; and
    e. mitigate the impact of construction and industrial operations – dust, mud, noise, vibration, traffic and hours of operation.

2. In line with the Agent of Change principle, development for new or re-provided uses that are sensitive to noise and other nuisance must include suitable mitigation for managing the amenity impacts generated by existing lawful neighbours and established land uses. Conversely, new, re-provided or intensified noise and other nuisance generating uses within primarily residential neighbourhoods should minimise and mitigate its own amenity impacts. This is of particular importance in the following contexts:
    a. New residential developments within or adjacent to the Evening and Night Time Economy Zones, which should be carefully located, designed and buffered so as to not impede the development of a successful evening and night time economy.
    b. New development on or adjacent to designated and non-designated employment locations, which should demonstrate neighbourliness in design and layout and to ensure they do not compromise current operational functions of employment uses and the viability of industrial intensification on any employment designated land.
    c. New and re-provided community facilities outside of town centres, which should demonstrate neighbourliness in design and layout.

3. Developments should seek compliance with best practice standards technical guidance supported by the Council where they are relevant to the development proposals.

4. A Plant Maintenance Plan will be secured pre-occupation where mechanical solutions are proposed to mitigate identified amenity impacts. This applies when:
    a. the mechanical solutions are necessary to mitigate odour or air quality impacts generated by the site on neighbouring uses; or
    b. the mechanical solutions are necessary to meet agent of change and mitigate amenity constraints on-site generated by lawful neighbouring uses.



Justification

3.58 All scales of development (including domestic extensions, or conversions and changes of use), have the potential to impact upon neighbours and the neighbourhood from the start of construction through to the on-going operation of a site. This policy addresses a range of neighbourliness issues and sets out appropriate responses in order for development to contribute positively to neighbourliness.

3.59 Newham is a mixed use borough, with many dense neighbourhoods. In parts of the borough, further change is planned, including introduction of residential uses in areas previously focused on more industrial uses. These are positive elements that offer opportunities for economic and social interaction, and are basic requirements of successful network of well-connected neighbourhoods. Nevertheless, this can give rise to amenity and Agent of Change impacts or concern that are linked to specific aspects of design. In order to fulfil the spatial strategy set out in this Local Plan, employment designations (set out in Local Plan Policy J1) and town centres designated as visitor-focused evening and nigh time economy zones (set out in Local Plan Policy HS5) will be protected under Agent of Change principles to achieve their potential for economic intensification. In these circumstances, new development within or adjacent that is not directly compatible with established and planned use patterns will need to mitigate the existing and likely amenity impacts using a reasonable worst-case scenario. For example, increasing housing in town and local centres can deliver much needed homes in accessible locations and help support the high street's vitality and viability. Despite this, it will be important to carefully design the residential environment and mitigate against the noise, safety, odour and other amenity impacts of a plan-led growth in the visitor focused evening and night time economy within the centre. At the same time, new evening and night time economy uses in centres will also be required to contribute to a positive environment in line with requirements set out in this Plan.

3.60 The Newham Community Facilities Needs Assessment has highlighted a need for allowing smaller scale social infrastructure (typically below 1000sqm) within otherwise residential neighbourhoods. In these cases, it will be important to protect residential amenity as part of the design of the community use.

3.61 While large scale mixed use developments allow for all interrelationships between existing and new uses to be considered through masterplanning, any poorly resolved detail can amplify to significant impact on the successfulness of the new development. The environmental standards and design guidance set out in the policy implementation should assist applicants in the creation of successful, healthy and safe places.

Implementation

D6.1	The policy intention is that applicants should minimise the environmental, social and design based impacts of their proposals on neighbours. Neighbours also include those uses on-site that are retained, e.g. a restaurant is a neighbour in the case of a residential upwards extension on the same site. Early consideration of neighbourliness matters will be encouraged through pre-application advice/design review, and as part of masterplanning of large sites where detailed designs will be addressed at a later stage. Proposals should be accompanied by statements detailing their response to the components of neighbourly development as relevant to the scheme, and outline all design, mechanical and management practice mitigations. Information should be sufficient to make adequate assessment against the required guidance and standards.

D6.1

Safety and Security

Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes should improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security, and this should be balanced with the need to avoid light spillage onto urban green spaces to protect biodiversity. Well-designed lighting schemes on commercial properties can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.

The temporary impact of construction works on perceptions of safety will also be important to address through the design of hoardings and the construction and logistics management plan.

Emissions mitigation (including kitchen extraction odour)

Where combustion flues are necessary, having regard to Local Plan Policy Policies CE2 and CE6, these should normally terminate above the roof height of the tallest building in the development and the immediately surrounding area to ensure maximum dispersion of pollutants. Where this is not possible, alternative measures to prevent nuisance fumes entering nearby buildings should be agreed by the Council.

Odour generation uses include, but are not limited to, premises for the preparation of hot food and drink that utilise an extraction flue.

D6.1

Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells should be discharged at roof level and must be designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, applicants and/or occupiers should investigate the potential to vent emissions to the roof.

Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways.

Developments should incorporate suitable off-street outdoor facilities for smokers wherever relevant to the use and possible, to avoid the need for smokers to congregate on the pavements.

Noise mitigation

Noise-generating uses and activities include, but are not limited to, schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, data centres, safeguarded wharves, rail and other transport infrastructure. In many cases, the operation of these premises can be 24 hours a day, 7 days a week, and a reasonable worst-case scenario should be factored into the assessment of their impacts.

D6.2 Agent of Change is defined in line with the London Plan (2021) Policy D13, as relating to the operational needs of lawful uses and including their amenity impacts (noise, odour/fumes, vibration, dust and other nuisances). The Agent of Change principle places the responsibility for mitigating impacts from existing noise or other nuisance generating activities or uses on the new development. Through the application of this principle existing land uses should not be unduly affected in their operation or their potential for intensification or expansion by the introduction of new sensitive uses.

Nevertheless, the Agent of Change approach should not be interpreted as offering a licence to existing operators and occupiers for the unfettered intensification of disturbance-generating activity or other unreasonable behaviour. It is assumed that uses should be operating lawfully and reasonably, and that Local Plan standards proportionately apply to any application for further intensification of the use generating the amenity impacts.

As part of the Agent of Change approach to new development, it is important that consultation takes place with existing operators/ occupiers to ensure that new development is deliverable and that the two uses can operate alongside each other. It is important that not just the physical neighbours, but also the river, air and highway traffic regulated by the Port of London Authority, Civic Aviation Authority and Transport for London are also consulted.

Designated Evening and Night Time Economy Zones

Developments including residential uses on sites in town centres should identify the location of evening and night time economy uses (see implementation section of Local Plan Policy HS5 Part 2) and likely night time footfall routes close to the site that will need to be buffered through application of Agent of Change and neighbourliness principles in accordance with this policy.

D6.2 Designated and non-designated employment locations

To secure the long-term viability of existing and future employment uses on employment land (including intensification in line with Policy J2), the policy requires applicants to demonstrate that proposed vulnerable uses (such as residential uses or schools) exposed to the various amenity impacts generated by a range uses on employment land can successfully co-exist long-term in the context of their site. The area and intensity of amenity impacts will vary between different uses (e.g. a wharf vs. a paper recycling centre). The assessment and mitigations should reflect a reasonable worst case scenario for the baseline amenity impacts (see further in this section) as well as a proportional assessment of amenity impacts from potential future intensification of employment land as part of the lawful intensification of use on SILs and LILs, having regard to national regulatory context and the spatial strategy set out in this Plan.

Attention to context, design and layout of schemes (including as part of a site wide masterplan) will need to be carefully considered. When industrial/employment and residential uses are to be co-located in the same site, or when residential uses are proposed adjacent to a Strategic Industrial Location or Local Industrial Location, a non-residential stacked light industrial/employment building is considered the most appropriate typology to provide a buffer for the heavier industrial uses and mitigate any impact on residential amenities. Separate heavy vehicle and pedestrian accesses should be designed to avoid conflicts between different uses. Public realm enhancements and landscaping can also be used as a buffer between industrial and residential uses. Layout measures could also mitigate the impact of industrial uses on residential uses, this includes avoiding habitable rooms and amenity space facing industrial sites. All buffer solutions should be demonstrated as effective mitigations on amenity (noise, odour, dust, light etc.) through testing against the technical standards set out in Part 4 of this policy.

D6.2

Proposals incorporating and intensifying industrial uses, or schemes adjacent to industrial uses should respond to the principles and design guidance set out in Local Plan Policy D1 and within the Newham Characterisation Study (2024) Chapter 9 Borough-wide Design Principles, Section 4 Managing Industrial and Residential Relationships.

When assessing baseline amenity impact generated by existing uses, applicants should ensure that the testing undertaken reflects a reasonable worst-case scenario. Engagement with operators is strongly recommended to ascertain:

- The busiest times of the week/day to undertake monitoring (e.g. when a ship is unloading on the jetty, or when a large event is planned at a sporting or cultural venue), and whether more than one recording interval is recommended. And
- Any increases in intensity of operation that may reasonably take place within the margins of existing planning permissions, e.g. a shift to 24/7 operation.

<u>Social infrastructure in out of centre locations</u>

Where any new, intensified or re-provided social infrastructure use are acceptable in an out-of-centre location, in line with Local Plan policies of the Social Infrastructure section, the context of the site will determine how the Agent of Change principles should be addressed.

Where the site is within a prevailing residential use context, the residential amenity should be protected. Amenity considerations that should be minimised or mitigated include:

- Noise, which should be assessed on the basis of the highest possible intensity of use of the social facility, at different times of the day and week, and include the management of noise in outdoor spaces as part of servicing the site or social events.

D6.2

- Light spillage.
- Noise and vibration generated by any mechanical or electrical plant necessary for the operation of the facility.
- Odour, where hot food may be prepared and served on site.
- Overlooking of living spaces or private rear gardens should be avoided.
- Risk of antisocial behaviour. This should be mitigated by providing well managed and maintained facilities for users (e.g. visible and easily accessible bins to mitigate risk of fly tipping to neighbouring properties; staff visibility at key entrance points or easy to use help points).

Where the site is within an employment or industrial prevailing context, the implementation requirements set out above will apply (Designated and non-designated employment locations). Certain amenity impacts such as noise or dust may have particular impacts on the accessibility of the facility to certain more vulnerable user groups, such as neuro-divergent people, or people suffering from respiratory illnesses. The assessment and design of the site and its access arrangements should demonstrate how amenity impacts on user groups will be managed and mitigated, in line with requirements of Local Plan Policy SI2 Part 7.

Where the social infrastructure use is part of a wider cluster of similar uses, for example a healthcare cluster of buildings, a wider assessment of amenity constraints across the cluster is encouraged where feasible and proportionate. Measures that improve the neighbourliness of the wider cluster in the context of its neighbourhood, for example through landscaping and pedestrian and cycle access enhancement schemes, will be supported.

D6.3

Expert advice will be taken within the Council or from relevant partners to support these assessments and to ensure proposals are of the highest quality and address neighbourly development from the outset.

The below benchmarks, standards and guidance documents are important to make that assessment. Where any of the guidance has been subsequently updated, the latest version should be used. Where guidance has been withdrawn, the Council's Environmental Health team should be consulted on the most appropriate approach to be taken.

Where a development concerns an existing building (through conversion, extension, change of use) which does not meet such standards, this will be a consideration in itself when assessing its suitability for the proposed change.

D6.3

Table 2 – Policy: Environmental standards and guidance

Issue	Standard or Guidance
Telecommunications	International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines
Radioactive sources and x-ray generators	National Radiological Protection Board (NRPB) guidelines
Light Spillage	Institute of Lighting Professionals: Guidance notes for the reduction of obtrusive light Institute of Lighting Professionals: The Brightness of Illuminated Advertisements
Odour and Fumes	DEFRA guidance manuals for regulation of businesses that produce pollution: Environmental Permitting: General Guidance Manual on Policy and Procedures for A2 and B Installations, and other business-specific guidance that may apply Institute of Air Quality Management • Guidance on the assessment of odour for planning • Good Practice on Air Quality Monitoring for Brownfield Projects • Land-Use Planning & Development Control: Planning For Air Quality EMAQ+, Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems

D6.3

Table 2 – Policy: Environmental standards and guidance

Issue	Standard or Guidance
Dust	Greater London Authority: Control of dust and emissions during construction SPG (2014)
Noise	DEFRA: Noise Policy Statement for England Institute of Acoustics, ProPG: Planning and Noise Education Funding Agency: BB93 Acoustic design of schools: performance standards British Standards: • BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise • For plant noise on premises, BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'. • For controlling internal and external noise within a development, BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings'. CRTN: Control of Road Traffic Noise

D6.3

Table 2 – Policy: Environmental standards and guidance

Vibration	British Standards: • BS 7385-2:1993 Evaluation and measurement for vibrations in buildings • BS 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting. • BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration
Daylight/Sunlight	Building Research Establishment (BRE): Site layout planning for daylight and sunlight: a guide to good practice (BR 209 2022 edition)

D6.4 The Mechanical Plant Maintenance Plan should include a list of suitable technical solutions that can be reasonably implemented to address all aspects of amenity that are proposed to be mechanically managed. The maintenance plan should include information about the maintenance and lifespan of the equipment, and site management information. This information will be reviewed by Environmental Health team, who may require or suggest amendments to be made.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)

Policy Links

Local Plan:

- D1: Design standards
- D4: Tall Buildings
- D5: Shopfronts and advertising
- J1: Employment and growth
- SI2: New and re-provided community facilities and health facilities

London Plan 2021:

- D13: Agent of Change
- D14: Noise



Policy D7: Conservation Areas and Areas of Townscape Value

1. Developments within Conservation Areas or in their settings should conserve, enhance or better reveal their significance, in line with requirements of the NPPF and guidance set out in relevant Conservation Area Appraisal and Management Plans or other guidance documents.

2. Developments within areas designated as Areas of Townscape Value or in their settings should seek to sustain and enhance their character and avoid and minimise significant harm that may affect the Council's ability to designate these as conservation areas in the future.

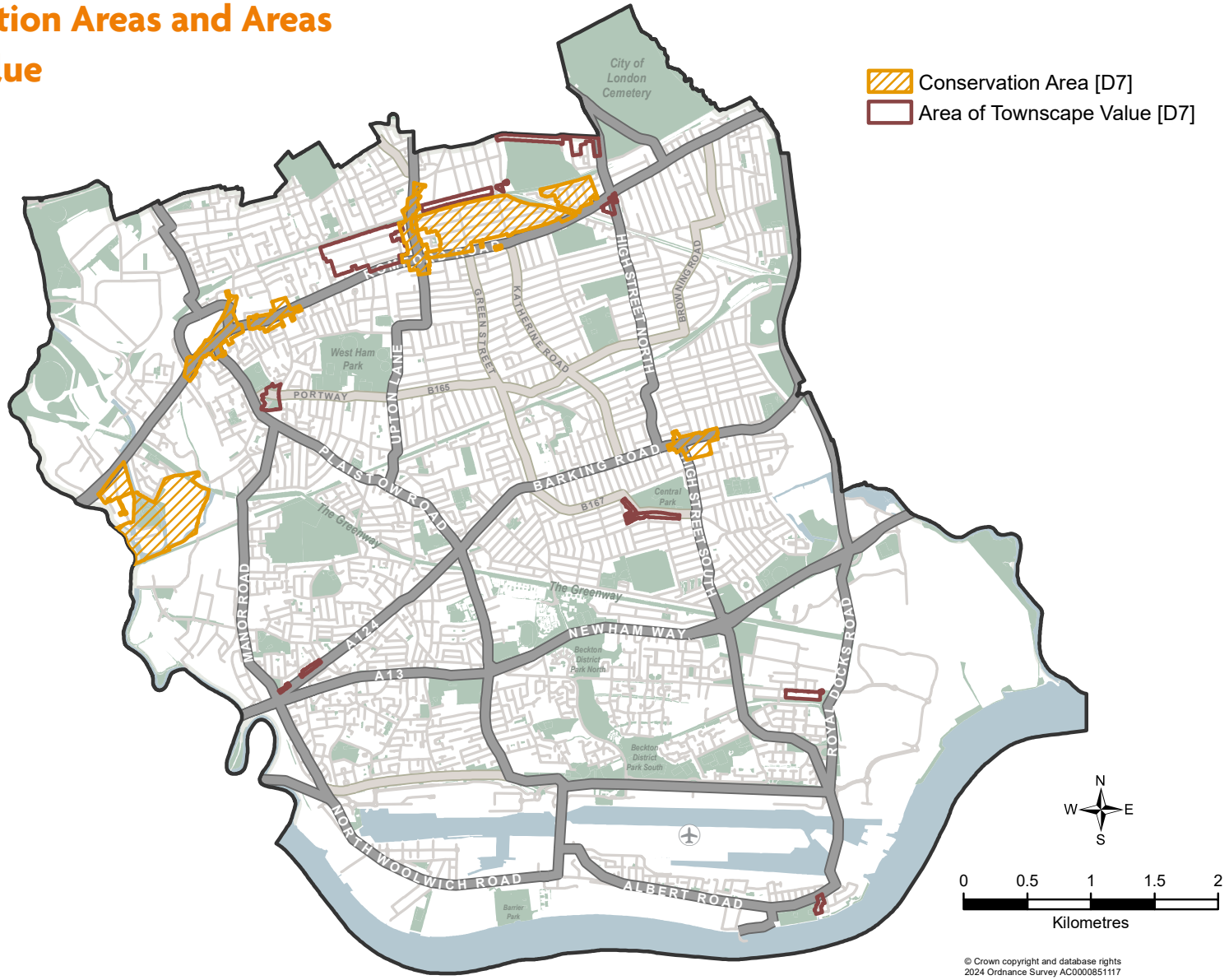
3. Loss of characteristics which contribute to the significance of Conservation Areas and Areas of Townscape Value will not be supported, unless demonstrated that all reasonable steps have been taken to avoid and minimise harm and that public benefits proportionately outweigh any harm caused. Characteristics include:
    - Buildings and structures and their curtilage which make a positive contribution to the significance of the conservation area or area of townscape value.
    - Public spaces and street patterns.
    - Views, vistas.
    - Uses and cultural heritage.
    - Mature trees and landscapes.

Planning Obligations

- Where necessary, contributions for the protection and enhancement of the significance of tangible or intangible heritage assets will be secured.



Map of Conservation Areas and Areas of Townscape Value



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Justification

3.62 Newham currently has relatively few Conservation Areas, Listed Parks and Gardens and Listed Buildings, partly due to the borough's relatively recent urbanisation. The scarcity of both designated and non-designated heritage (when compared to other London boroughs) makes it all the more important that their significance and the positive elements of their setting are conserved and enhanced, particularly in terms of placemaking, cultural and social representation, and more localised wayfinding.

3.63 The NPPF and the London Plan (2021) place great importance on preserving and enhancing the significance of Conservation Areas. Alongside greater control of development, research[9] also indicates that there are important community wellbeing and economic regeneration benefits from designation including the generation of local employment opportunities, local awareness activities generating community cohesion and increased interest in the local area.

3.64 This policy seeks to ensure that Newham's important historic townscapes continue to be protected and enhanced.

Implementation

D7.1

A Conservation Area is an area of special architectural or historic interest, the character or appearance of which it is desirable to be preserved or enhanced. In Newham there are currently 9 Conservation Areas:

- Durham Road conservation area, Manor Park, E12
- East Ham conservation area, E6
- Forest Gate Town Centre conservation area, E7
- Romford Road conservation area, Forest Gate, E7
- Stratford St John's conservation area, E15
- Sugar House Lane conservation area, Stratford, E15
- Three Mills conservation area, E3
- University conservation area, Stratford, E15
- Woodgrange Estate conservation area, Forest Gate, E7

Conservation Area adoption introduces additional controls over the way owners/occupiers can alter or develop their properties, including:

- Requirement for planning permission for demolition of unlisted buildings.
- Restriction on the types of development that can be carried out without planning permission.
- Prior notification of works to trees (min. 6 weeks).
- Additional planning controls for advertisements and signs.

The Council will continue its programme of managing the historic built environment in the borough, which may result in further conservation area adoptions and updates to existing Appraisals and Management Plans.

Design and Access Statements (and pre-application information packs) should respond to the various aspects of character as set out in the Newham Characterisation Study (2024) and relevant Appraisal and Management Plan.

Planning applications in Conservation Areas or their settings should be supported by a Heritage Impact Assessment, and in the case of tall buildings also a Townscape Visual Impact Assessment (including zone of visual influence / zone of theoretical visibility), to assess any harm to the significance of the historic environment and the effect on the townscape character.

[9] See for example G Ahlfeldt, N Holman and N Wendland (2012), An Assessment of the effects of Conservation Areas on Value, London School of Economics; Historic England, Heritage Counts annual reports.

D7.2	Areas of Townscape Value are parts of Newham' townscape that have a character or appearance that is of local architectural and historic interest, warranting differentiation and from their surrounding area. Some of these areas may have the potential to be progressed as new conservation areas in the future, particularly where listed or locally listed buildings form part of the setting. There are 9 identified Areas of Townscape Value: • ATV1 Wanstead Flats • ATV2 Sebert Road • ATV3 Manor Park • ATV4 Forest Gate • ATV5 All Saints Church, Church Street North • ATV6 Cheltenham Gardens, Henniker Gardens, Rancliffe Road • ATV7 Canning Town • ATV8 Winsor Terrace • ATV9 Bargehouse Road / Woolwich Manor Way While areas of Townscape Value have no statutory recognition in law unlike Conservation Areas, the Council considers them to be 'non-designated heritage assets' and as such encourages their conservation and enhancement by the application of Local Plan policies. Design and Access Statements (and pre-application information packs) should respond to the various aspects of character as set out in the Newham Characterisation Study (2024) and the Areas of Townscape Value Evidence Base (2015).
D7.3	Consideration of significance and any potential harm will be undertaken in line with the tests set out in the NPPF.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Areas of Townscape Value Evidence Base, London Borough of Newham (2015)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- D1: Design standards
- D3: Design-led site capacity optimisation
- D5: Shopfronts and advertising
- D9: Designated and non-designated buildings, ancient monuments and historic parks and gardens
- GWS4: Trees and hedgerows

London Plan 2021:

- HC1: Heritage conservation and growth
- D1: London's form, character and capacity for growth



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Policy D8: Archaeological Priority Areas

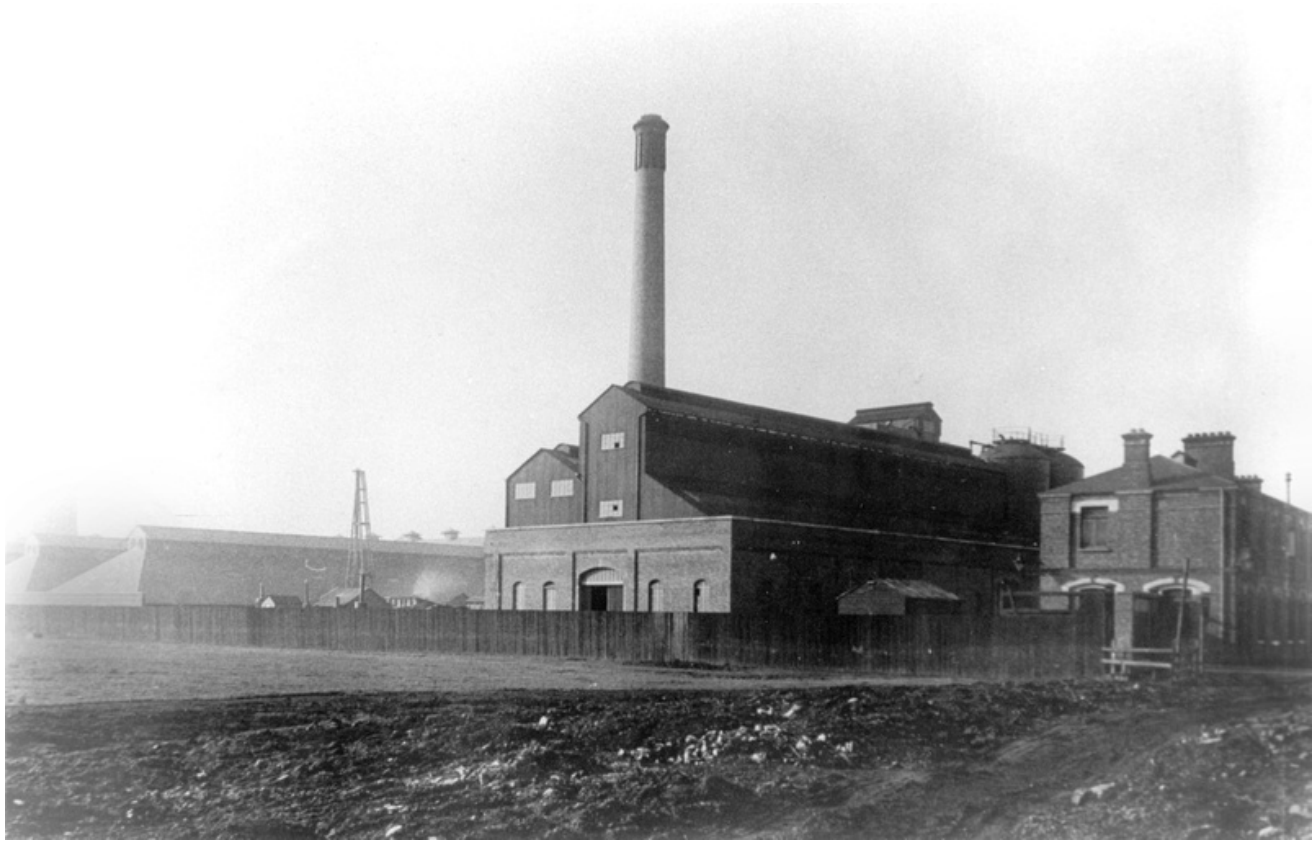
1. All major applications on sites at or smaller than 0.5ha within Archaeological Priority Areas Tiers 1 to 3, and all major applications on sites larger than 0.5ha anywhere in the borough, must submit an archaeological desk-based assessment and if necessary a field evaluation, to accompany a planning application.

2. Minor and householder applications resulting in ground excavation/piling in Tier 1 areas must also submit an archaeological desk-based assessment to accompany a planning application.

3. Where field evaluation(s) identifies heritage assets of archaeological interest, development must:
    a. document the significance of the asset; and
    b. secure the protection of the asset, with priority given to in-situ display, within or visible from the public realm.

Planning Obligations

- Where necessary, we will secure arrangements for the documentation, registration and protection and display of any identified heritage assets of archaeological interest.



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Justification

3.65 Local authorities have a responsibility to conserve the historic environment, including through policies to identify areas where development must have due regard to processes for identifying, recording and preserving potentially significant archaeological remains. The Greater London Archaeology Advisory Service, part of the London office of Historic England has identified Archaeological Priority Areas in Newham where known heritage assets of archaeological interest are concentrated or where there is clear potential for new discoveries based on the history of the area and previous archaeological investigations.

3.66 Archaeological Priority Areas are sorted into 4 tiers and are justified by a statement of significance which indicates the nature of the interest to be considered. Their primary purpose is to help highlight at an early stage where a development proposal may affect a heritage asset of archaeological interest.

Implementation

D8.1

An Archaeological Priority Area is a defined as an area where, according to existing information, there is significant known archaeological interest or potential for new discoveries. Newham's Archaeological Priority Areas are as follows:

Archaeological Priority Area ID	**Area Name**
Tier 1	
APA1.1	Beckton WW2 Gun Emplacement
APA 1.2	Fort Street
APA 1.3	Prince Regent Lane
APA 1.4	Stratford Langthorne Abbey
APA 1.5	Woolwich Manor Way
Tier 2	
APA 2.1	East Ham
APA 2.2	Green Street
APA 2.3	Little Ilford
APA 2.4	Plaistow
APA 2.5	Plashet
APA 2.6	Stratford
APA 2.7	Upton
APA 2.8	Wall End
APA 2.9	West Ham
APA 2.10	Beckton Sewage Works
APA 2.11	Ilford Gaol
APA 2.12	Stratford Railworks
APA 2.13	Thames Ironworks
APA 2.14	London to Colchester Roman Road

D8.1

APA 2.15	Manor Park to North Woolwich Roman Road
APA 2.16	Newham Cemeteries
Tier 3	
APA 3.1	River Lea
APA 3.2	River Roding
APA 3.3	Royal Docks
APA 3.4	Canning Town/Newham Way
APA 3.5	Beckton
APA 3.6	Wanstead Flats
Tier 4	
APA 4.1	Rest of the borough

Further information on the character of each Archaeological Priority Area is included in the Newham Archaeological Priority Areas Appraisal (2014). Newham will seek to review this evidence base during the lifetime of the Plan, in order to reflect recent fieldwork that may helpfully refine both spatial extent and significance of Newham's Archaeological Priority Areas.

The relevant consultation and investigation expectations that accompany an Archaeological Priority Area designation (set out by Greater London Archaeology Advisory Service) should be complied with. Greater London Archaeology Advisory Service offer a pre-application service which may provide additional guidance in relation to the specific site.

The Council will consult Greater London Archaeology Advisory Service on:

- All major planning applications on sites over 0.5 hectares, irrespective of the Archaeological Priority Area tier (1 to 4) they are in.

D8.1

- All Environmental Impact Assessment Scoping requests and Environmental Statements.
- Any application supported by/requiring an archaeological desk-based assessment.

It should be noted that archaeological projects have a well-established history of enabling successful community engagement and applicants are encouraged to consider how community engagement can occur where heritage assets of archaeological interest have been identified.

D8.2

The relevant consultation and investigation expectations that accompany an Archaeological Priority Area designation (set out by Greater London Archaeology Advisory Service) should be complied with.

The Council will consult Greater London Archaeology Advisory Service on:

- Minor planning applications in any Archaeological Priority Areas tiers 1 to 3.
- Domestic basement applications in Archaeological Priority Areas tiers 1 and 2 only.
- Householder and equivalent-scale very minor applications in Archaeological Priority Areas tier 1 only.

Greater London Archaeology Advisory Service offers a free pre-application service which may provide the relevant support for undertaking a desk-based assessment in the case of minor developments without the need for further research.

In less sensitive or smaller schemes, a watching brief involving a professional archaeologist monitoring the development groundworks and recording any remains exposed may be appropriate instead of field evaluation.

D8.3	Consideration of significance and any potential harm will be undertaken in line with the tests set out in the NPPF. Publicity and publication of results as well as housing the archive of finds are often a key part of mitigating the archaeological impact of a development. Greater London Archaeology Advisory Service is often unable to advise that a development has been fully in compliance with a planning condition until these aspects have been secured. Finds and records from archaeological investigations in London are normally deposited with the London Archaeological Archive and Research Centre.

Evidence base

- Newham Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- London Borough of Newham: Archaeological Priority Areas, English Heritage (2014)

Policy Links

Local Plan:
- D1: Design standards
- D9: Designated and non-designated buildings, ancient monuments and historic parks and gardens

London Plan 2021:
- HC1: Heritage conservation and growth
- D1: London's form, character and capacity for growth



Policy D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens

1. The Council will seek to ensure designated and non-designated heritage assets (including archaeological) will be conserved and enhanced. Development should secure viable, sustainable and appropriate futures for all heritage assets within the scope of the site, particularly where they are on the Historic England's Heritage at Risk Register. Any change the heritage asset or their settings should not undermine their significance and the contribution of their settings to that significance, seeking to increase their presence and encourage wider appreciation and access to them.
2. Development that singularly or cumulatively leads to harm to or loss of designated heritage assets or their setting will normally not be supported. Where harm or loss is justified and suitably weighted through public benefits arising from the proposal, these benefits must be timely delivered before the overall completion of the scheme and before the loss of the asset where relevant.
3. The council will encourage the conservation, repair, enhancement and reuse of non-designated heritage assets. Significant harm or loss of non-designated heritage assets should be avoided. Where significant harm or loss is justified, the existing historic fabric or archaeological findings should be documented and archived in line with NPPF requirements.
4. Developments affecting Newham's historic parks or their setting should:
    a. sustain and enhance their historic significance and natural heritage value; and
    b. seek to conserve and enhance key views out from the landscape; and
    c. not detract from its public access, functionality and enjoyment, layout, design, or character; and
    d. not prejudice future restoration; and
    e. make a positive contribution to the historic streetscape of the park.



Justification

3.67 The importance of protecting, conserving and enhancing both designated heritage assets and those more informally recognised, together with their setting, is key to effective place-making. The former includes those buildings, monuments, structures, parks, etc., that are subject to national listing or scheduling; the latter includes Locally Listed buildings and buildings that are not yet on the local list but where development management processes uncover their heritage value.

3.68 The significance of a building or feature only becomes apparent with further research and physical investigation. Their value includes adding interest and legibility, (as landmarks) to an area; the contribution to social interaction; as a focus for community memory and activity; and the economic contribution they make as visitor attractions in their own right or as part of a place for spending time and money in.

3.69 This policy recognises that all these types of heritage assets are sensitive to change that may directly or indirectly affect them. Moreover, many of Newham's heritage assets are not well integrated in the wider environment, including with other assets, which means their settings often detract from them. Some assets are in disrepair, or they are underused or there are barriers to accessing to them.

Implementation

D9.1

Proposals to repair, alter or extend designated and non-designated heritage assets must be justified and contribute to the protection and enhancement of the significance of the asset.

The Heritage at Risk Register is updated annually by Historic England and includes designated buildings and sites that are at risk of loss through neglect, decay or development, or are vulnerable to becoming so. For developments affecting these buildings/sites the Council will seek to secure their appropriate restoration, reuse and long-term viable maintenance.

Suitable interventions to secure viable, sustainable use for them include:

- Appropriate deployment of 'meanwhile' uses and other suitable measures to activate spaces and structures to help bring them back into people's day-to-day experience of places; or
- Improving perceptions of safety and quality of access; or
- Interventions for resilience to climate change and energy efficiency.

However, any such change needs to be based on an understanding of the sensitivity to change of the asset affected, ensuring it is appropriately valued and accommodated to avoid causing harm to its significance. It is also recognised that in places that are subject to a 'transform' character (Local Plan Policy D3), telling a story of the place's evolution and aspiration through its design and programming, for example through arts-and-culture-led regeneration, will be beneficial.

Proposals within the setting of designated assets should seek to create positive relationships, particularly where the significance of the setting has been lost.

D9.2 and D9.3

Consideration of significance and any potential harm on either designated and non-designated assets and their setting will be undertaken in line with the tests set out in the NPPF.

A Heritage Impact Assessment, and where tall buildings (defined in line with Local Plan Policy D4) are proposed a Townscape Visual Impact Assessment, must be submitted. These should be prepared by an independent heritage specialist and should include:

- Details of the significance of the assets (from heritage records available, including local archives, as well as from engagement with local communities). And
- The impact on the asset's significance and/or on the wider townscape character or setting, of all design options considered, as proportionate to the significance of the asset. And
- Evidence as to why harm is necessary or unavoidable, and an assessment of all alternatives considered, as proportionate to the significance of the asset.

Development which does not respond to local character and design quality as required by the wider policies of this Local Plan and the London Plan (2021), and is considered over-development, cannot be seen to justify harm to heritage assets by reason of the number of homes provided.

Public benefits that could be considered to justify harm include:

- Provision of affordable housing over and above that required by Local Plan Policy H3.
- Responding to the climate emergency (and is demonstrated to be the least harmful approach to deliver the required retrofit, in line with Historic England guidance).
- Providing public access to previously inaccessible heritage assets.
- Bringing the asset into viable use where all other alternatives to secure the future of the asset have been exhausted.

D9.2 and D9.3	However, harm resulting in loss of an asset should be avoided. Where demolition or loss of features associated with the significance of the asset is proposed, detailed plans and photographic evidence, alongside any relevant objects of significance identified on site, will be submitted to Newham Archives or other suitable organisations that can ensure public access to the evidence collected.
D9.4	Consideration of significance and any potential harm will be undertaken in line with the tests set out in the NPPF. Proposals should help manage the impact of the historic tall walls around the park(s) which are a feature of their character but may also create extensive inactive frontages. The contribution of ancillary buildings, features and uses, such as caretaker homes, railings/boundaries and tree nurseries, to the significance of the historic park should also be assessed, and protected where they are integral to the significance of the park.

Evidence base

- Characterisation Study: Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Locally Listed Buildings in Newham, London Borough of Newham (2010)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- D1: Design standards
- D3: Design-led site capacity optimisation
- D5: Shopfronts and advertising
- D7: Conservation Areas and Areas of Townscape Value
- GWS1: Green spaces
- GWS4: Trees and hedgerows

London Plan 2021:

- HC1: Heritage conservation and growth
- D1: London's form, character and capacity for growth



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HIGH STREETS

3.70 Newham's high streets provide a range of functions of vital importance to the daily lives of our communities. Their varied character and size, alongside their transport connectivity, provides choice and helps connect people across neighbourhoods.

3.71 Newham has six existing town centres: Stratford (which includes Stratford City), East Ham, Green Street, Forest Gate, Canning Town and East Beckton. These large destinations are complemented by a network of smaller local centres and neighbourhood parades which are also protected through the Local Plan. Beyond the designated network remain significant sections of historic high street frontages that provide further choice for residents and a source of affordable floorspace for businesses, though often these frontages can feel less organised and less well maintained. Within Beckton and Gallions Reach neighbourhoods, retail parks provide large scale retail offerings that are mostly accessible by car.

3.72 Changing trends in how people use the high streets have further highlighted the importance of broadening access to a range of local services and leisure activities, together with quality public realm, to help support and attract activity in centres. As we move into new working patterns, with more people working from home for much of the week, this is driving new footfall patterns in town and local centres. These trends, alongside recent changes in national planning legislation and policy, pose challenges and opportunities for our high streets in adapting so as to maintain and enhance their vitality and viability.

3.73 The more successful high streets have been those that can support a strong independent retail and leisure offer, local cultural events, markets, meanwhile uses and pop-ups, which draw in a more diverse range of people.

3.74 High street environments also offer opportunities for social interaction to help improve mental health and social isolation, and space to showcase the cultural diversity of the borough. But high levels of traffic, crime and fear of crime, lack of access to health promoting food and services, and inaccessibly designed spaces can negatively impact on health. It is therefore important for the Local Plan to consider the high streets' environment holistically, from management of uses, to shopfronts and public realm design.

3.75 The policies in this section seek to ensure Newham's network of centres can evolve and thrive and continue to meet the shopping, social, leisure and civic participation needs of Newham's growing population. Key to achieving this is ensuring that the network of centres, complemented by secondary activity in high street or other sustainable out of centre locations, work together to create a dense network of opportunities to support quality, healthy and active day to day living within and between Newham's neighbourhoods.

This section contains the following policies:

- **HS1: Newham's Town Centres Network**
- **HS2: Managing new and existing town and local centres**
- **HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services**
- **HS4: Markets, and events/pop-up spaces**
- **HS5: Visitor evening and night time economy**
- **HS6: Health and wellbeing on the High Street**
- **HS7: Delivery-led businesses**
- **HS8: Visitor accommodation**



Policy HS1: Newham's Town Centres Network

1. All homes in Newham should be within a maximum 400 metre radius of at least one designated centre or parade, or be within a 15 minute walking distance of at least two designated centres or parades. This will be delivered through directing main town centre uses to the Newham Town Centres Network, as set out in Table 3, unless exceptions apply under other sections of this Local Plan. The network will be managed and supported to service the needs of residents, workers and visitors, and includes:
    a. The designated town centres and their primary shopping areas and primary shopping frontages. And
    b. The designated local centres and their primary shopping areas. And
    c. The designated neighbourhood parades. And
    d. A new district level town centre to be created at N17.SA1 Beckton Riverside, subject to the criteria in Part 2, re-configuring and capitalising on the trade draw of the out-of-centre Gallions Reach Shopping Centre. And
    e. New local centres at N8.SA9 Pudding Mill, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, N2.SA4 Thameside West and N2.SA3 Connaught Riverside, and expanded Local Centres at N9.SA1 Plaistow North, N1.SA2 Rymill Street and N2.SA1 Silvertown Quays, subject to the criteria in Part 3. And
    f. The creation of new Neighbourhood Parades at N17.SA1 Beckton Riverside, N2.SA2 Lyle Park West and N8.SA3 Greater Carpenters District.
    g. The creation of new small scale frontages serving localised need in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade.

Table 3: Newham's Town Centres Network

Name	Current scale	Potential scale	Key functions
Town Centres[10]			
Stratford	Metropolitan	International	• Meeting retail and leisure needs of all Newham and wider region residents and visitors. • Meeting local community use needs. • Major Grade A office cluster and Central Activity Zone overspill location. • Tourist destination of international significance. • Transport interchange.
East Ham	Major	Major	• Meeting retail, leisure, civic and services needs of all Newham residents. • Meeting local community use needs. • Post-16 education hub.
Forest Gate	District	District	• Meeting local catchment needs for retail, leisure, services and community uses.
Green Street	District	District	• Meeting local catchment needs for retail, leisure, services and community uses. • Specialist retail visitor destination.
Canning Town	District	District	• Meeting local catchment needs for retail, leisure, services and community uses. • Transport interchange.
East Beckton	District	District	• Meeting local catchment needs for retail, leisure, services and community uses.
Beckton Riverside	n/a	District (with potential for Major)	• Meeting local catchment needs for retail, leisure, services and community uses. • Re-location/retention of comparison retail capacity from Gallions Reach Shopping Park.

[10] Where the latest London Plan sets out changes to the existing or potential scale of a town centre, this will supersede those set out in this table.

Name	Current scale	Potential scale	Key functions
Local Centres			
East Village	Local centre	Local centre	• Meeting local catchment needs for retail, leisure, services and community uses.
Sugar House Lane	Local centre	Local centre	
Manor Park	Local centre	Local centre	
Maryland	Local centre	Local centre	
High Street North	Local centre	Local centre	
Vicarage Lane – West Ham	Local centre	Local centre	
	Local centre	Local centre	
Church Street – West Ham	Local centre	Local centre	
Plashet Road	Local centre	Local centre	
Plaistow Road	Local centre	Local centre	
Terrace Road	Local centre	Local centre	
Plaistow North	Local centre	Local centre	
Boleyn	Local centre	Local centre	
High Street South	Local centre	Local centre	
Greengate	Local centre	Local centre	
Abbey Arms	Local centre	Local centre	
North Woolwich	Local centre	Local centre	
Albert Basin	Local centre	Local centre	
Katherine Road Central	Local centre	Local centre	
Katherine Road South	Local centre	Local centre	

Name	Current scale	Potential scale	Key functions
Local Centres			
Silvertown	Local centre	Local centre	• Meeting local catchment needs for retail, leisure, services and community uses. • Supporting an incidental visitor economy.
Custom House	Local centre	Local centre	• Meeting local catchment needs for retail, leisure, services and community uses. • Supporting an incidental visitor economy linked to the Excel centre.
Pudding Mill	n/a	Local centre	• Meeting local catchment needs for retail, leisure, services and community uses.
Twelvetrees	n/a	Local centre	
Thames Wharf	n/a	Local centre	
Connaught Riverside	n/a	Local centre	• Meeting local catchment needs for retail, leisure, services and community uses. • Supporting incidental visitor economy linked to the London City Airport.

Name	Current scale	Potential scale	Key functions
Neighbourhood Parade			
Jack Cornwell Street	Neighbourhood parade	Neighbourhood parade	• Meeting local catchment needs for convenience retail, services and community uses.
ChurchRoad – Little Ilford	Neighbourhood parade	Neighbourhood parade	
Kathrine Road North	Neighbourhood parade	Neighbourhood parade	
Plaistow High Street	Neighbourhood parade	Neighbourhood parade	
Vicarage Lane – East Ham (E6)	Neighbourhood parade	Neighbourhood parade	
Portway	Neighbourhood parade	Neighbourhood parade	
West Ham Memorial Parade	Neighbourhood parade	Neighbourhood parade	
Prince Regent Lane North	Neighbourhood parade	Neighbourhood parade	
Tollgate Road	Neighbourhood parade	Neighbourhood parade	
Fife Road	Neighbourhood parade	Neighbourhood parade	
Cundy Road	Neighbourhood parade	Neighbourhood parade	
East Ham Manor Way	Neighbourhood parade	Neighbourhood parade	
Royal Albert Quay	Neighbourhood parade	Neighbourhood parade	

Name	Current scale	Potential scale	Key functions
Neighbourhood Parade			
Albert Road	Neighbourhood parade	Neighbourhood parade	• Meeting local catchment needs for convenience retail, services and community uses.
Western Gateway	Neighbourhood parade	Neighbourhood parade	• Meeting local catchment needs for convenience retail, services and community uses. • Supporting incidental visitor economy linked to the Excel conference centre.
Lyle Park	n/a	Neighbourhood parade	• Meeting local catchment needs for convenience retail, services and community uses.
Carpenters	n/a	Neighbourhood parade	
Pier Park	n/a	Neighbourhood parade	

2. Development 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 Map, must contribute to the masterplanned phased delivery of the centre by applying the following principles:
    a. The overall number, scale and mix of main town centre uses should reflect the intended district status in the town centre network, or up-to-date evidence justifying a major town centre function, and be supported by an Impact Assessment, a Marketing Strategy and a Vacancy Prevention Strategy; and
    b. Proposals demonstrate the transition from a car-dependent retail park format to an integrated, accessible, welcoming environment within and adjacent the new town centre, including:
        i. Phasing demonstrates how significant reductions in car parking will be expediated, including through any complementary transport measures and meanwhile use strategy, in line with polices N17 and BFN2. And
        ii. Main town centre uses within the intended primary shopping area should maximise continuous shopfront frontages along the key footfall route(s) linked to the new DLR station, and be supported by quality public realm and by good permeability and connectivity. And
        iii. The phased delivery of the town centre uses ensures coordination with the delivery of new homes and the new DLR station and route.
    c. Where parts a. and b. are not met, development should represent asset management that does not intensify the existing retail park, in line with Policy HS3 and the London Plan.

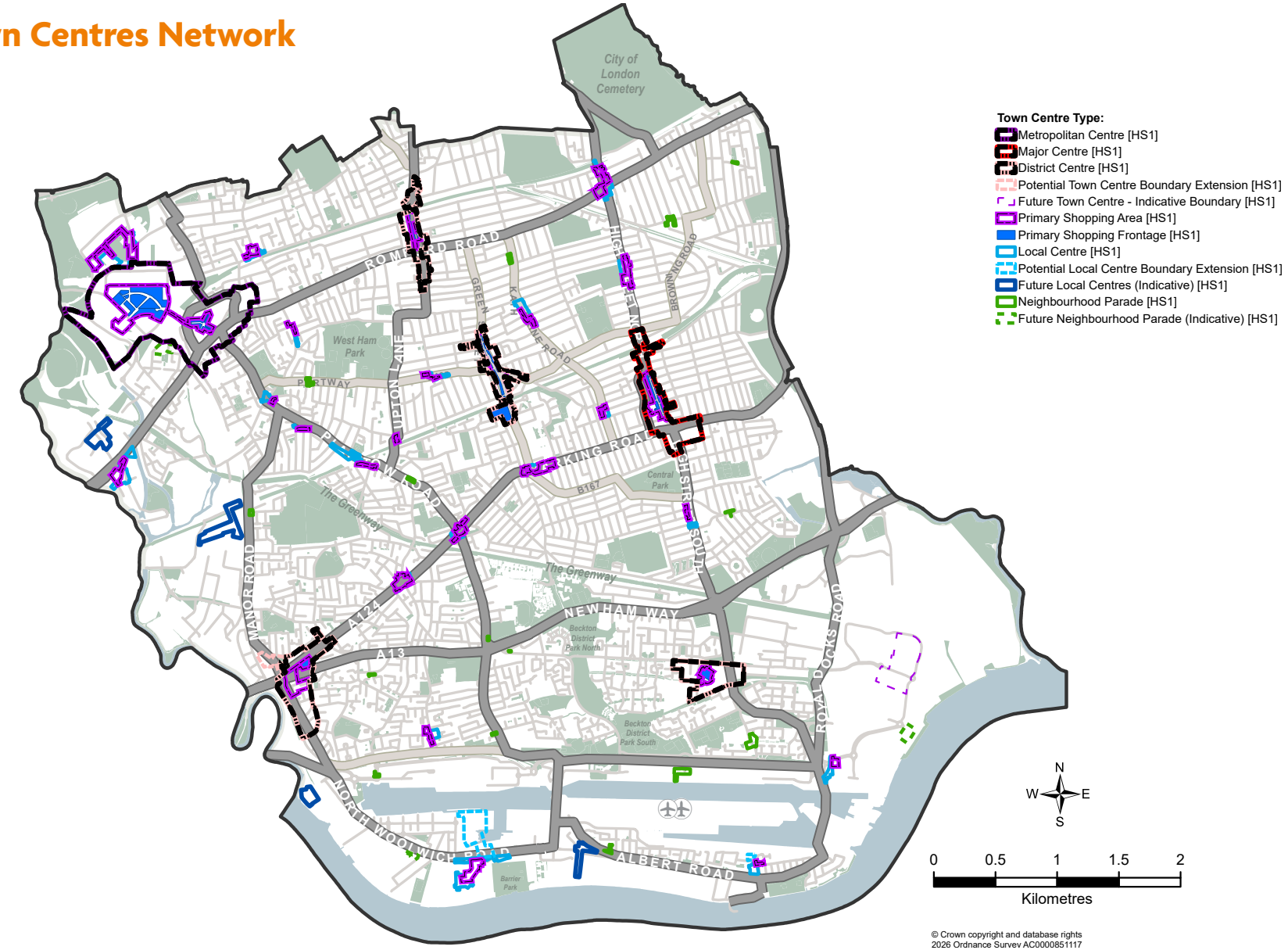
3. Development within the areas identified to deliver new and extended local centres, starting from the indicative boundaries mapped on the Policies Map, should contribute to the masterplanned delivery of the centres by applying all of the following principles:
    a. The total retail and leisure main town centre uses floorspace will respond to local need (within a 400 metre radius), as demonstrated through an Impact Assessment. Other proposed main town centre uses or social infrastructure uses should respond to local need in line with the strategy set out by policies of this Local Plan.
    b. The overall scale of main town centre uses or social infrastructure uses of the local centre will primarily result in at least 20 non-residential units. The majority of units will be between 80 sqm and 150 sqm GIA each. A small to medium sized food store may be appropriate to meet local need, subject to passing a retail Impact Assessment.
    c. A well-resourced and evidenced Marketing Strategy and Vacancy Prevention Strategy will be put forward.
    d. Main town centre use units within the proposed primary shopping area should maximise opportunities for continuous shopfront frontages along the key footfall route(s), and be supported by quality public realm and by good permeability and connectivity.
    e. Integrating existing buildings in non-residential (or mixed) use, where appropriate.
    f. The centre has at least one bus stop or station within 100 metres of its boundary.
    g. Any change or expansion of the boundary is justified through masterplanning.



4. Development within neighbourhood parades or proposed new non-designated small scale frontages should ensure that:
    a. The overall parade remains of a neighbourhood scale, of between five and ten non-residential units, and primarily small units (80 to 150 sqm GIA) in use class E (Commercial, Business and Service) or social infrastructure of a scale justified by local need. Where development includes 300sqm GIA or more of cumulative new floorspace in retail (Class E(a)) or in main town centre leisure uses (Class E(b)) or Sui Generis), a retail and/or leisure Impact Assessment will need to be passed.
    b. Loss of units, including through the merging of units, does not result in the overall number of units falling below five.
    c. A small food store of more than 300 sqm GIA may be appropriate, subject to passing a retail Impact Assessment, and the use is limited through condition.
    d. Any proposal resulting in 1000sqm GIA or more cumulative floorspace in main town centre uses, including creation of new neighbourhood parades, is supported by a well-resourced Vacancy Prevention Strategy.
    e. Any change or expansion of the boundary is justified through masterplanning.



Map of Town Centres Network



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Justification

3.76 Newham's town centre network is not static, it is constantly evolving and adapting to market trends and legislative and policy interventions. Within the Plan period to 2042, evidence suggests the need to plan for and deliver new town and local centres alongside continued management of the existing network. In line with NPPF and London Plan (2021) requirements, this policy identifies and protects, and in certain cases creates new town and local centres and neighbourhood parades in strategic, accessible locations.

3.77 The Council, as expressed in the Towards a Better Newham: Recovery and Reorientation Strategy (2020), is committed to delivering a network of well-connected neighbourhoods. For high streets, this approach builds on existing social trends, including the 'shop local' drive where residents support their local high streets, and particularly the small independent businesses, through their spending choices. This enables money to stay local for longer and contributes to community wealth building.

3.78 Overall, the main objective of this policy is not to impose limits on the location of new homes, but to deliver a network of vibrant town centres, local centres and neighbourhood parades which offer unique and complementary experiences and that support choice within a network of well-connected neighbourhoods. To help achieve this objective, the Network's proximity and density criteria – the 400 metre radius and the 15 minutes walking distance – have informed the designation process, alongside the recommendations of the Retail and Leisure Assessment (2022). A number of existing and recently delivered high street locations have been designated through this Local Plan. The resulting network of existing and future designations, alongside flexibility in establishing further new small scale frontages, ensures the Council can meet its aspiration that all homes should be within a maximum 400 metre radius of at least one designated centre or parade, or be within a 15 minutes walking distance of at least two designated centres or parades.

3.79 Locational data as well as resident feedback shows that there is a significant geographical gap in the range of services within easy reach of residents living south of the A13, including large basket (weekly) food shopping offered by medium and larger food stores. To help address the geographic imbalance, the policies in this section seek to create new clusters of main town centre uses in appropriate locations, primarily new local centres, but also one new town centre at Beckton Riverside. These new designations will provide the opportunities to improve access to essential services, including food stores, while the use of the Impact Assessment will ensure that the overall network of centres continues to be well balanced. New centres or neighbourhood parades will be delivered through site allocations.

3.80 The assessment of the Retail and Leisure Study (2022) identified an oversupply of convenience floorspace in the Beckton area, due to the presence of several out of centre retail park. However, the assessment also showed that the Gallions Reach Shopping Centre continues to be a major destination in the borough for comparison retail, second after Stratford metropolitan Town Centre and with a higher trade draw for comparison retail than East Ham major Town Centre. It also fulfils a local leisure function in the current absence of a suitable offer at East Beckton district Town Centre. Therefore, the study has recommended that the comparison retail quantum be translated to the new town centre to be delivered at Beckton Riverside, and that the new centre, alongside East Beckton, should continue to develop a local leisure offer.

3.81 The London Plan (2021) classifies the upper ranges of town centres which service the needs of the population at a borough level or higher, designating them as district, major, metropolitan or international centres. Newham's local centre designations recognise that these centres are usually of importance primarily to Newham residents living or working within their catchment, reinforcing the need for these to receive a similar level of policy attention and protection as the larger town centres, and in line with the NPPF.

3.82 Boundaries of neighbourhood parades have also been reviewed or newly designated to reflect the change in focus of high streets away from a reliance on retail and towards creating socio-economic clusters to service a broader range of local retail, leisure and community needs.

3.83 The NPPF requires Local Plans to identify the boundaries of town centres, and their primary shopping areas that identify concentrations of retail provision and highest levels of footfall. These are identified on the Policies Map for established and emerging town and local centres. The preferred boundaries for future local centres and neighbourhood parades have also been mapped on the Policies Map, based on masterplanning information available at the time of designation. The protected areas inform the approach to managing edge of centre and out of centre development, in line with the town centre first approach of the NPPF (2023) and London Plan (2021), and other policies of this Plan.

Implementation

HS1.1	In setting out Newham's Town Centres Network this policy identifies the range of town centres and their scale as defined by the London Plan (2021), and local centres that primarily service a more localised area. Both town centres and local centres as allocated by this policy meet the definition of 'town centres' as set out in the NPPF (2023) and should be assessed as such under the NPPF requirements. For purposes of assessing proposals for retail and main town centre leisure uses, the catchments of town centres are defined on the basis of the Retail and Leisure Study (2022) sub-areas A-E (see map 4.1 and para 4.11 of the study), while the catchments of local centres are defined as the 400m area around their boundary. At the neighbourhood scale, neighbourhood parades are designated and protected for their role in meeting day to day needs of residents and helping maintain sufficient choice within the broader Town Centres Network. Neighbourhood parades do not meet the NPPF definition of a town centre. The town centre, local centre and neighbourhood parade designations under this policy are mapped on the Policies Map. Trade draw is the proportion of trade that a development is likely to receive from customers within and outside its catchment area, and will be a consideration in determining whether proposal support the planned scale of the centre or parade they relate to. On masterplanned multi-phase sites delivering more than 5000 sqm of new main town centre uses floorspace, the Council will secure timely delivery of the non-residential floorspace, proportionate to the scale of the residential phases of the development, and responding to evidence of existing need from the wider catchment where relevant. This will secure timely delivery of retail, leisure and services infrastructure to support the health and wellbeing of the growing local communities. <u>Town Centres (District and above)</u> The district town centres should seek to attract trade draw from their catchment areas as defined by the Retail and Leisure Study (2022) and may specialise to attract trade more broadly in particular sectors (as currently Green Street district Town Centre does). East Ham should continue to service the whole borough as a major town centre. Stratford is the only existing town centre in Newham's network supported to grow in scale, to an international level under London Plan (2021) hierarchy. More substantial growth in main town centre uses is supported here, and should respond to local need identified in the Retail and Leisure Study (2022), or more up to date evidence, alongside wider regional opportunities.

HS1.1	However, proposal for main town centre uses floorspace at or above 2500 sqm GIA within Stratford Town Centre will also need to demonstrate an understanding of any potential impacts on Newham's other town centres, and particularly East Ham. Where a likely significant impact is identified, mitigations should be imbedded in the proposal in order to ensure all town centres continue to function at their intended scale. This should be set out as part of the Marketing Strategy – see policy HS2 Part 7. The site allocation N17.SA1 Beckton Riverside is expected to deliver a new town centre to address gaps in the network and service the future neighbourhood. The current trade draw of Gallions Reach Shopping Centre may justify that, if successfully translated to the future town centre on the Beckton Riverside site, the scale of this town centre be elevated to a major town centre status, as recognised by the London Plan (2021). Nevertheless, the transformation of the offer of the out of town retail park into an accessible town centre, remains contingent on delivery of the new DLR station and route and complementary transport measures. <u>Local Centres</u> Local centres should remain focused on servicing the needs of their catchment population, within a 400m radius around the boundary. Nevertheless, a number of local centres in Newham are located in areas that may draw visitors more broadly due to the specific economic/functional, historical or landscape value of the wider area. These centres, where known, have been noted in Table 3: Newham's Town Centres Network. Subject to robust evidence identifying the level and type of additional visitor footfall expected in a local centre, a larger scale of retail or food and drink leisure offering may be justified. It is important that local centres are of an appropriate scale to meet local needs, rather than delivering new 'destination' uses that might draw trade away from the wider network of town centres.

HS1.1	Therefore, the Impact Assessment should demonstrate that the scale and type of retail and leisure uses proposed, cumulatively and individually, would not result in existing trade draw patterns being significantly altered. <u>Neighbourhood parades</u> Neighbourhood parades do not meet the NPPF definition of a town centre, and as such are treated as out of centre destinations for the purposes of applying the Impact Assessment, in accordance with Local Plan policy HS3. This includes new neighbourhood parades to be delivered in line with the spatial strategy, where the scale of the overall parade and the size and mix of the units proposed should demonstrate no significant impact on existing trade draw patterns. See also implementation criteria under Part 4 below. <u>New Small scale frontages</u> It is not possible to fully address all 400m catchment gaps in the network at this time. To provide additional flexibility to address this, the policy allows for small scale frontages to be delivered, of a similar function to the designated neighbourhood parades, and which will be considered towards designation as a neighbourhood parade as part of future reviews of the Local Plan. In determining if a proposed new undesignated small scale frontage is appropriate, the applicant should submit a gap analysis to demonstrate: • Proximity criteria: A 400 metre radius around the proposed small scale frontage overlaps by less than 50 per cent with any other 400 metre radius of a designated area in the network (existing and future). The radius is measured from the perimeter of the proposed

HS1.1

small scale frontage and the boundary of relevant designated parts of Newham's High Streets network. And

- Network density criteria: The proposed small scale frontage location helps achieve the aspiration for at least two high street destinations within a 15 minute walking area. This should reflect a detailed understanding of the actual walking conditions for a range of different users) of the site (e.g. accessibility conditions for people with movement impairments, women-friendly routes). The most accessible area should be chosen, accounting for any proposed enhancements as part of the development or known programmed Highways works.

In limited circumstances where site allocations are expected to deliver new centres/parades, the above criteria may be used to justify the split of the provision of retail and leisure uses across parts of the site, thereby generating one or more new small scale frontages alongside the necessary centre/parade. A clear justification will be required for the benefits of this approach compared to clustering of uses in the designation only, and should not result in additional retail or leisure floorspace being provided on site (i.e. the cumulative site-wide quantity is justified by local catchment need, through the Impact Assessment). Further expansion of main town centre use floorspace for ground floor frontage activation will normally not be supported.

Where acceptable in principle, new small scale frontages should also meet the criteria set out in Part 4 of this Policy. The Newham Characterisation Study (2024) Borough-wide Design Principles chapter includes further design recommendations (primarily under section 9.2.1 'Provide Local Uses That Support 15 Minute Neighbourhoods') that should be imbedded in the design brief when new small scale frontages are proposed.

HS1.2

As part of the delivery of Beckton Riverside allocation (N17.SA1) and through a co-designed masterplan process, the offer of Gallions Reach Shopping Centre should be reconfigured into a modern town centre. The Retail and Leisure Assessment (2022) recommended that the retail capacity of the area should be retained and that the centre should target a District level centre, unless up-to-date and robust evidence justifies the delivery of a Major centre scale, in line with the London Plan (2021). See also the detailed principles set out in site allocation N17.SA1 Beckton Riverside.

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. 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.

The submitted Impact Assessment will follow national planning guidance on scope and methodology. It should demonstrate that the scale of main town centre uses proposed help fill identified needs in the network and/or is a re-provision of floorspace from the Beckton area retail park(s) to within the centre, without significantly drawing trade away from established town centres, or jeopardising existing retail and leisure commitments (including within local centres in the catchment). For clarity, the overall retail and leisure floorspace capacity of the new town centre should respond to the residential increases in the Beckton area, but also more widely across the borough reflecting the percentages of trade draw achieved by the existing retail park as identified by the Retail and Leisure Study (2022).

HS1.2	Phasing of the transformation from a retail park to a town centre will need to be carefully managed, evidenced and approved by the council through planning application(s). The intention will be to align the delivery of the town centre with the public transport transformation of the site, so that they can progress alongside and result in a substantial modal shift to sustainable travel. In line with the NPPF and London Plan (2021) policy SD7, this means managing the phasing of intensification of main town centre uses floorspace to align with the growth of the new neighbourhood and the public transport accessibility improvement of the site. Further, where proposals for main town centre uses at Gallions Reach Shopping Park are not paired with measures for the significant reduction in car trips to the site through reduction in car parking and complementary transport measures ahead of the DLR station completion, the council will continue to assess such proposals as asset management for an out of centre destination initially, or edge of centre location as development delivery progresses, in line with Policy HS3.
HS1.3	The important role of local centres across the borough is highlighted by the Retail and Leisure Study (2022), attracting strong levels of convenience goods trade, and helping complement the larger town centres and provide choice. Aside from retail and food and drink leisure uses, local centres can be crucial in providing a focus for community, cultural and civic life within neighbourhoods. To help address this, the Policies Map provides a preferred boundary for each future local centre, which is based on an assessment of the planning history of the site, the retail growth need identified by the Retail and Leisure Study (2022), and the principles of development for the site set out in the respective site allocation.

HS1.3	The full methodology and justification for the boundaries is set out in the Town Centre Network Review Methodology Paper (2022) and its update (2026). Any changes to the boundary should be justified by the evidence submitted as part of an application, and should not impede the strategic principles set out by this policy (e.g. function within the wider network) and the relevant site allocation (see Neighbourhoods sections). The resulting proposed mix, type and overall scale of main town centre retail and leisure uses should be carefully assessed within a retail and leisure Impact Assessment, considering the geographic context influencing access to similar goods and services in the area, the scale of population (existing and planned) within catchment, expenditure generated, target business occupier types, accessibility, and nearby existing and planned facilities. The submitted Impact Assessment will follow national planning policy guidance on scope and methodology. This applies even if the proposed development is fully within (or smaller than) the boundaries set out on the Policies Map. Units should be small, between 80 and 150 sqm GIA each, unless a larger floorspace is required to deliver local social infrastructure (in line with Local Plan Policy SI2) or a small to medium food store. A small to medium food store is usually at least 300sqm GIA, and may be as large as 2000sqm GIA. Any ancillary comparison sales floorspace is significantly less than the convenience floorspace of the shop, and will generally not include a significant clothing, shoes, home decorations, electronics or toys selection. They may have an on-site bakery, but will not have an ancillary cafe or food court.

HS1.3	Units size and specification should be further refined through an understanding of the non-residential property market in the catchment area, as part of a Marketing Strategy following the principles set out in Local Plan Policy HS Part 7.. The Marketing Strategy information should then also inform the Affordable Commercial, Business and Service (Class E) Units Marketing Strategy for the site, responding to Local Plan Policy HS2 Part 6.a. A Vacancy Prevention Strategy will be undertaken in line with the criteria set out in Local Plan Policy HS2 Part 6.b. Physical layout and built form should ensure the local centre is accessible, inclusive, inviting (including through environmental quality) and well integrated into the movement hierarchy of the wider neighbourhood public realm (i.e. takes advantage of public transport nodes and key footfall routes). Local Plan Policies D1, D2, T3 and HS2 provide further guidance. Shopfronts should be designed in line with Local Plan Policy D5. The public realm of the primary shopping area (new or extended) should be designed to provide substantial public realm net gains in line with Local Plan Policies HS2 Parts 8 and 9 and Policy D2. This includes generous pedestrian space, and route connections to direct high footfall to the primary shopping area.
HS1.4	Neighbourhood parades help achieve a fine-grained network of destinations within Newham's Town Centres Network. They support access to usually top-up shopping, day-to-day services, and food and drink leisure uses, and some may include local scale social infrastructure. While their scale is small, they still need to be of a size able to accommodate adaption and change in response to local needs and wider market trends. In line with the size of existing parades and the recommendations of the Newham Characterisation Study (2024) Chapter 9 Borough-wide Design Principles, section 9.2.1, the minimum size of a Neighbourhood Parade and any future small scale frontage should be five non-residential units, and the maximum size should generally be no more than ten non-residential units. To help address this, the Policy Map provides a preferred boundary for new neighbourhood parades, which is based on an assessment of the planning history of the site, the retail growth need identified by the Retail and Leisure Study (2022), and principles of development for the site set out in the respective site allocation. The full methodology and justification for the boundaries is set out in the Town Centre Network Review Methodology Paper (2022) and its update (2024). Any changes to the boundary should be justified by the evidence submitted for the site, and should not impede the strategic principles set out by this policy (e.g. function of the wider network of centres) and the relevant site allocation (see Local Plan Neighbourhoods section). The size of each unit should be small, 80-150 sqm GIA, so that trade draw remains local and does not begin to compete with the larger local centres and town centres. Social infrastructure requiring larger units may be delivered as part of the neighbourhood parade mix where there is a demonstrated local need, in line with Local Plan Policies SI2-4.

HS1.4	Future Neighbourhood Parades For future neighbourhood parades, the resulting proposed mix, type and overall scale of main town centre retail and leisure uses should be carefully assessed within a retail and leisure Impact Assessment. This should consider the geographic context influencing access to similar goods and services in the area, the scale of population within catchment (defined as within 400m of the boundary), expenditure generated, target business occupier types, accessibility, and nearby existing and planned facilities. The submitted Impact Assessment will follow national planning policy guidance on scope and methodology. Where major developments propose 1000sqm or more in main town centre uses, including when delivering new neighbourhood parades, or small scale frontages in suitable locations (see part 1 implementation section above), and there is likely no significant impact of the development on the wider network of town and local centres, the overall provision of non-residential units will need to be supported by an adequately resourced Vacancy Prevention Strategy following the criteria set out in Local Plan Policy HS2 Part 6. Existing neighbourhood parades In existing neighbourhood parades, where development proposes to introduce one or more larger retail or leisure units of more than 300 sqm GIA, either through merging of existing units, extension or new provision, a retail Impact Assessment will be required, in line with national policy and guidance. Where the assessment indicates the impact of the development may be acceptable, the Council may impose conditions limiting change of use to other sub-use-classes of Use Class E, in line with Local Plan Policy HS3 Part 4.a. Nevertheless, merger of units will usually only be acceptable where the overall number of units within the parade remains above 5.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- Newham Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Consumer Data Research Centre, Mapmaker: Priority Places for Food - Index (2022)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- HS2: Managing new and existing town and local centres
- D5: Shopfronts and advertising
- D7: Neighbourliness

London Plan 2021:

- SD7: Town Centres: development principles and Development Plan Documents
- SD8: Town centre network

Policy HS2: Managing new and existing town and local centres

1. All development within the borough's town and local centres should meet all the below criteria as proportionate to the type and scale of development proposed:
    a. Contribute to vitality and viability of Newham's interrelated Town Centres Network, helping to reduce trade leakage.
    b. Provide uses of a type and scale appropriate to the size and function of the centre.
    c. Respond to neighbourhood/place-specific visions and challenges.
    d. Provide attractive, active frontages, and accessible and safe access.
    e. Contribute to quality, engaging and inclusive public realm.
    f. Be well managed and maintained.

2. Within the primary shopping area:
    a. Ground floor units within Commercial, Business and Service Uses (Class E) will be protected and promoted in order to maintain a vibrant shopping and leisure area, with:
        i. Stratford Town Centre retaining at least 90 per cent of ground floor units within Commercial, Business and Service Uses (Class E); and
        ii. in all other town and local centres, at least 80 per cent of ground floor units functioning within Commercial, Business and Service Uses (Class E) . And
    b. Loss of ground floor units in Commercial, Business and Service Uses (Class E) will not be supported. Loss may be justified where:
        i. The existing use is protected under Social Infrastructure or Employment policies of this Local Plan and the relevant release criteria are met. Or
        ii. The site is a vacant building and marketing evidence demonstrates that there is no current or future demand for the use. And
        iii. The development provides an alternative main town centre use or community use at ground level, with well-designed active 'shop-like' frontage and public realm animation.

3. Within town and local centres, development proposing the shared use of a space or a building by multiple uses/businesses engaged in main town centre uses is encouraged, including on upper floors, subject to all the following:
    a. Internal space arrangements facilitate easy, legible access to all businesses or public-facing activities on site.
    b. Active frontages, and particularly shopfronts, are retained.
    c. Where the proposal includes programming of leisure, cultural and community events, this should be supported by an Events Management Plan, which addresses and mitigates any additional amenity or transport impacts generated.

4. Within town and local centres, the subdivision, or the conversion or change of use of ancillary floorspace (including internal storage and outdoor yard facilities), of existing units in Commercial, Business and Service Uses (Class E) will not be permitted unless evidence is submitted that this would not compromise the functionality, accessibility and viability of the unit.

5. Within town and local centres, redevelopment or refurbishment of sites will be supported where it contributes to the vitality and viability of the centre and optimises the use of the site. Residential uses as part of the mixed use development is strongly supported. Overall the scheme should be designed to:
    a. [Re-]provide main town centre uses at the ground level along the key public footfall routes, maximising continuity of the non-residential frontages/shopfronts. Positioning of non-residential uses across multiple floor levels will also be supported where it responds to market demand and the scale of the centre. And
    b. Optimise servicing for both residential and non-residential uses. And/or
    c. Mitigate amenity impacts resulting from the introduction of residential uses, in line with Agent of Change criteria of Local Plan Policy D6.

6. Within town and local centres, developments proposing a net total of 1000 sqm GIA or more in main town centre uses should:
    a. Deliver at least 10 per cent of floorspace as small Commercial, Business and Service (Class E) units (80 to 150 sqm GIA each) that will be marketed and maintained at discounted rent. This will be secured through planning obligations as part of an Affordable Commercial, Business and Service (Class E) Units Marketing Strategy. And
    b. Be supported by an effective Vacancy Prevention Strategy outlining how vacancies will be managed and minimised.

7. Within town and local centres, applicants proposing a net total of 2500 sqm or more GIA floorspace in any main town centre uses should submit an adequately resourced and evidenced Marketing Strategy demonstrating market demand for the type and range of units and uses proposed.

8. Major developments within town and local centres should incorporate new, or contribute towards enhanced access to, well-maintained publicly-accessible (free): drinking water fountains, toilets and baby changing/nursing facilities.

9. In line with public realm net gain principles of Local Plan Policy D2, developments in town and local centres should demonstrate how their proposals help achieve all of the below, as relevant to the scale and context of the development:
    a. An accessible, comfortable, greener, safe and well maintained public realm at all times of the day and night.
    b. Improved connectivity with and accessibility from neighbourhoods within the centre's catchment;
    c. The creation of public spaces for rest, play or cultural expression through arts and events, or smaller 'spill out' spaces to support adjacent leisure and community uses.
    d. Enhanced digital accessibility through integrated charging points and reliable free wi-fi.



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Planning Obligations

- A financial contribution towards enhancing access to publicly accessible drinking water fountains, or toilets and baby changing/nursing facilities, through the creation of new ones (off-site) or enhancement of existing facilities in the centre the site relates to, may be secured through a legal agreement, and will include maintenance costs.

Justification

3.84 This policy aims to secure the vitality and viability of Newham's Town and Local Centres, by accommodating local needs and managing wider trends, as recommended by the Retail and Leisure Study (2022) and in line with the NPPF and the London Plan (2021).

3.85 Evidence suggests only 15 per cent of online shoppers buy all of their fashion items online, with most people using both online and physical stores. The trend of click and collect services supplementing in-store sales has been growing for many years and continues to have a strong forecast. Alongside, there is a growing demand for food and drinks leisure, sports and recreation and cultural activities. However, experience surveys of young people (18-25 years old) and of those identifying as disabled (including age-related disabilities) have highlighted that these groups identify barriers to accessing and enjoying suitable activities, services and goods provided in town centres, for example due to safety concerns, poor accessibility, or the offer not being inclusive of their

needs. The data in how people use and experience high streets primarily highlights the importance of offering a coherent, inclusive and diverse town centre experience to attract visitors to the high street and to extend the time they spend there.

3.86 The policy seeks to facilitate an increasing range of uses within the network of town and local centres, including community space, food and drink leisure, sports and recreation and cultural facilities, alongside an enhanced public realm and additional housing. This will help improve the sustainability and adaptability of the centres in the long term. However, the diversification of uses is balanced against the need to focus retail and leisure, and more broadly Commercial, Business and Services (Class E uses) within primary shopping areas, as recommended by the Retail and Leisure Study (2022).

3.87 Property owners and business along high streets are also responding to market trends by transforming bricks and mortar shops into multi-use spaces, and there is generally less demand for large scale retail floorspace. This policy seeks to support this trend for innovative formats of co-location and multi-use within buildings, which can enhance the attractiveness of centres when well-designed and managed.

3.88 A further factor affecting town and local centres is the flexibility offered by the recent changes to use class legislation and permitted development rights. This means some changes will now be outside planning control and will need to be monitored as part of broader town centre work streams. However, the policy continues to protect the vitality and viability of the town and local centres by protecting against the loss of yard space or other ancillary floorspace for established Use Class E premises, where this would lead to adverse impacts on the continued main town centre use's operation.

3.89 The Retail and Leisure Assessment (2022) has identified a strong trend for affordability being a key factor in shopping destination choice, with discount stores performing strongly, and market stalls also being a key driver of footfall in the centres where they are established. Alongside this, there is a need to support small local businesses that contribute significantly to the vitality of Newham's established centres, and help similar businesses to expand or set up within Newham's future or expanded local and town centres. The policy responds by promoting an overall good supply of smaller sized units (80-150 sqm GIA) at affordable rents and through the protection of the quality of existing units.

3.90 Vacancies and blank frontages, particularly when clustered together, can have a negative impact on the perception of place (including safety), reduce footfall, and may lead to antisocial behaviour along these frontages. The policy therefore introduces new tools in the form of a Marketing Strategy and a Vacancy Prevention Strategy requirement to help manage longer term uncertainties in the market and secure the vitality of viability of both existing and future centres.

3.91 In line with the NPPF and the London Plan (2021), the policy recognises the important role of making best use of refurbishment and redevelopment opportunities, planned or windfall, to deliver an enhanced centre experience as well as increased footfall through new residential development. The policy also promotes improved quality, inclusivity and activation of the public realm as a key part in expanding the offer of centres, in line with Local Plan Policies D2. The offer of the public realm expands beyond pavements and open spaces, to include other public goods that promote an inclusive environment, such as water drinking fountains, toilets, baby changing and nursing facilities, and free WiFi.



Implementation

HS2 All	All the parts of this policy apply to established town and local centres, as well as new centres identified in Local Plan Policy HS1 Part 1. For new/extended centres to be delivered in phases, the masterplanning process, proposed phasing and parameter plans should all demonstrate a coordinated approach to placemaking that supports the transition of the centre between phases towards the completed, diverse, vibrant centre. Local Plan site allocations expected to deliver new/extended centres provide additional site-specific information and should be read alongside the requirements of this policy and policy HS1.
HS2.1	Applicants should demonstrate as part of their Planning Statement, and where relevant as part of the Marketing Strategy (Part 7), how the proposed development and its scale responds to the character and function of the centre it is located in or helps to deliver. The function of centres within Newham's network hierarchy, including any potential for achieving a higher London Plan scale, is set out in Local Plan Policy HS1 Part 1. On sites located in centres intended to primarily service a localised catchment (district town centres and local centres), the scale of development should respond to needs arising from the resident, tourist and worker population base within the catchment (see HS1 implementation 'all' section for definition). Larger scale developments, including for sport and recreation, tourism and culture main town centre uses, that are likely to generate trips from a much wider area should be directed to the centres that function at Major level or above - currently Stratford and East Ham, or be robustly justified in a lower tier centre through an assessment demonstrating how the overall network of centres will be positively balanced.

HS2.1	Development must also refer to the relevant policies in the Plan (including in the Neighbourhoods section, Inclusive Economy or Social Infrastructure chapters). The strategies and reports listed below, or their subsequent updates, may also be used as relevant to the type and scale of development proposed, in order to understand place-specific vision and challenges. • Retail and Leisure Study, Urban Shape Planning Consultants (2022) and appended topic papers, Managing Vacancies Through Meanwhile Use Strategies (2024) and Supporting Provision of Affordable Small Business Premises (2024) • Community Facilities Needs Assessment, Publica (2022) • Building Newham's Creative Future, Publica (2022) • Built Leisure Needs Assessment, Strategic Leisure Limited (2025) • Employment Land Review, Stantec (2022, and 2025 update), in relation to office and workspace demand. • Newham High Streets: Phase 1, London Borough of Newham (2021), currently covering Forest Gate Town Centre, Green Street Town Centre and Manor Park Local Centre. • Stratford Vision, London Borough of Newham (2022) Shopfronts and signage/advertisements should be designed in line with Local Plan Policy D5. Developments should also respond to opportunities to enhance public realm, having regard to Part 8 and 9 of this policy and to Local Plan Policy D2. Developments should help manage and maintain the vitality and viability of the centre they are part of. This will be achieved through a range of means, including: • Adequate mitigation and management of amenity, safety and transport impacts of the development

- An Affordable Commercial, Business and Service (Class E) Units Marketing Strategy and a Vacancy Prevention Strategy as per Part 6.
- An Events Management Plan for any programmed events as part of the offer of the site – see also Part 3 of this policy.
- Commitment to partnership working for the overall management of the Evening and Night Time Economy as required by Local Plan Policy HS5 Part 4, or for quality of food provision as per Local Plan Policy HS6 part 1.
- A Public Ream Management Plan as per Local Plan Policy D2.
- Details of the quality of design and the lifespan of materials and landscaping.

The council will monitor the impact of permitted development rights that allow conversion of Class E uses into dwellinghouses on the vitality and viability of town and local centres and their ability to function at the intended level in the network. Where justified, the Council will seek to adopt Article 4 Directions limiting this right.

HS2.2

The council will aim to publish an updated position statement for each centre every two years in order to monitor progress and highlight any centres that do not, or only marginally achieve expected levels. This will be used in the assessment process, unless an up-to-date survey is undertaken by the applicant following the council's methodology and submitted with the application.

Proposals for future centres as allocated by Local Plan Policy HS1 Part 1 should also achieve a good balance and concentration of retail and leisure uses alongside other Commercial, Business and Service (Class E) uses within the proposed primary shopping areas.

Applicants proposing loss of ground floor Commercial, Business and Service (Class E) use floorspace within the defined primary shopping areas, including through change of use or partial re-provision/partial retention as part of redevelopment, should demonstrate that the loss is justified by providing:

- Any evidence required under other sections of this Plan, as relevant. Social infrastructure within Use Class E include healthcare, nurseries and day centres, and gyms. Employment uses within Use Class E primarily represent offices, research facilities and light industrial processes falling under sub-class E(g).
- Where the site is a vacant building, evidence must be submitted to demonstrate that the site has no realistic prospect of being used within any of the Class E sub-use-classes, either as a whole or in part, in the foreseeable future.

The marketing evidence should include:

  - 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
  - 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
  - a record of all expressions of interest received with full reasons given as to why any offer was not accepted; and
  - the range of development options considered in order to meet existing demands for Class E uses, including alternative internal layouts and mixed use/multi-use (in line with Part 3).

- Evidence of the benefits of the new use outweighing the loss, for example by providing for strategic infrastructure responding to evidenced local need.

	• Where the centre is less than 5 percentage points above the benchmark level, or below the benchmark, the consideration of acceptability of the proposed loss of floorspace should be made in the context of the pipeline of development in the wider primary shopping area for that centre, and should demonstrate that the policy benchmark is cumulatively maintained or cumulatively achievable over the 5 years following expected start on site/cease of the current use. Where loss is deemed acceptable by the Authority, the design of the site must demonstrate how its visual impact on the primary shopping area has been avoided or minimised, e.g. to not significantly break up the shopfront frontages, and to ensure alternative activation of frontages and of the public realm. Where loss of Use Class E floorspace is due to the consolidation of floorspace or conversion of ancillary spaces, rather than full loss of units, the retained floorspace should remain functional, in line with Part 4 of this policy.
HS2.3	This policy will apply to new or change of use development proposing the shared use of a space or a building by multiple uses/ businesses (e.g. cafe with community space), including shopping mall formats, food courts, and internal markets. While the mix of uses itself may not require planning permission (e.g. all would fall under E uses class), it will be important to demonstrate good design and consideration of the functional needs of the particular uses proposed on the site. The internal layout should help optimise the operational needs of all businesses on site, including servicing, while retaining a high quality shopfront. Visitors to the buildings should find it easy to find their way around to the business/event/activity they intend to visit.
HS2.4	Where loss of Class E floorspace is due to the consolidation of floorspace or conversion of ancillary spaces, rather than full loss of units, the retained floorspace should remain functional, as supported through submission of: • Independent advice from a commercial real estate agent with local market knowledge demonstrating the proposed unit will have reasonable chances of being occupied, or • Evidence demonstrating that the loss is justified by poor turnover performance per sqm compared to company benchmark (indicating over-provision of floorspace), and the proposed floorspace remains in line with company operational benchmarks, or • Contractual agreement(s) demonstrating long term alternative off-site arrangements for the management of storage and/or servicing needs in the vicinity (e.g. managed shared storage arrangements between multiple businesses). Units with a shopfront should generally not be less than 80sqm GIA floorspace (as recommended by the Retail and Leisure Study 2022), to allow for flexibility and adaptability long term, including the potential of managing on-line delivery orders on site without impacting the functionality of the sales floorspace or other necessary ancillary functions (e,g, staff room/office provision). The resulting shopfront and internal shop floor layout should meet wheelchair accessibility standards in line with building regulations and requirement of Local Plan Policy D5.
HS2.5	Redevelopment of town and local centre sites should help optimise the site for town/local centre uses at ground level along key footfall routes, with residential uses otherwise optimised in line with Local Plan Policy D3 and contribution towards the aspirations for the centre.

HS2.5	Adequate and full consideration of neighbourliness principles and waste, servicing and transport impacts, in line with other policies of this Local Plan, will be important in ensuring both the vitality and viability of the centre and the comfort and safety of future residents.
HS2.6	Small Affordable Commercial, Business and Service (Class E) Units Developments in town centres proposing a net total of 1000 sqm GIA or more in main town centre uses should deliver 10% of floospace as small units of 80 – 150 sqm GIA in Commercial, Business and Service (Class E) to be provided at affordable rent levels. Developments in local centres proposing a net total of 1000 sqm GIA or more in main town centre uses should provide the majority of units as small units of 80 – 150 sqm GIA in Commercial, Business and Service (Class E), in line with Local Plan Policy HS1, of which 10% of the floorspace should be allocated in line with this policy, at affordable rent levels. A smaller percentage of floorspace for small units may be acceptable where evidence submitted with the application shows that providing the full amount would impede delivery of: • a social infrastructure use that meets requirements of Local Plan Policies SI2-4, including cultural uses, gyms, health centres and nurseries/day-care facilities; or • a medium or larger food store in an area identified as lacking adequate access to fresh food, in line with a site allocation in this Local Plan, or as demonstrated through a Council published strategy or up-to-date research (e.g. Mapmaker: Priority Places for Food - Index (2022)). The location of the small units to be provided at affordable rent should be clearly marked on an Affordable Rent Units Plan.

HS2.6	Where the overall number of small units proposed surpasses 10 per cent of the total Commercial, Business and Service (Class E) floorspace proposed, it may be reasonable that the surplus is not provided at affordable rents upon completion, but should nevertheless be covered by the Vacancy Prevention Strategy. It will also be reasonable in such cases that there is additional flexibility around which units are provided at affordable rent level at any one time, which should be explained as part of the Affordable Rent Units Plan submitted. Where, following occupation, an affordable rent unit is substituted for (or lease changed to) a market rent unit, the applicant must notify the Local Planning Authority of this change at 'offer' stage of lease negotiation, alongside an updated plan of remaining/alternative affordable rent units, ensuring that the proportion does not fall below approved quota. Affordable rent levels will be negotiated on a case-by-case basis, and factor in the cost of service charges for the end-user, while ensuring the development remains viable. The affordable rents will optimise accessibility for Newham-based independent businesses, followed by other London-based independent businesses. An Affordable Commercial, Business and Service (Class E) Marketing Strategy should be submitted with the application, or in draft format at an appropriate stage of pre-application discussions, and should address: • An assessment of the existing Newham commercial property market and how this relates to the proposed rent discount level(s), with consideration of: - The recommendations of the Topic Paper: Supporting Provision of Affordable Small Business Premises (2024), appended to the Retail and Leisure Study (2022); and

HS2.6	- Assessment of typical market rent level, expressed per square meter, noting differences between older stock and recent/proposed stock; and - Assessment of the broad mix of stock in the centre (existing and/or proposed), by size and age of units; and/or - In new town and local centres, where the majority of units in the centre will likely be at the higher range of the rental market, provide an assessment against more established centres. • Marketing arrangements, with clear search and selection criteria and process, and reflecting the following priority occupier order: prioritising existing Newham businesses who have been/will be displaced as a result of redevelopment, then new Newham-based business start-ups and finally other independent businesses. This marketing plan may include partnership working with the Council, local business incubator or start-up programmes, and local community groups and voluntary organisations. • Monitoring framework, to be agreed with the Council, with assessment undertaken yearly for the first 3 years post-completion, to be shared with the council, and the data demonstrably informing any review of the Affordable Commercial, Business and Service (Class E) Marketing Strategy submitted to the Council for approval. <u>Vacancy Prevention Strategy</u> Major development proposing at least 1000 sqm total GIA in any main town centre use, can have a significant impact on the vitality of the centre. This includes retained/re-provided floorspace. It is therefore important that vacancies are carefully and proactively managed, and particularly where new centres are being created. This will be achieved through a Vacancy Prevention Strategy.

HS2.6	The Vacancy Prevention Strategy should consider providing meanwhile uses for the benefit of the local community and in line with Policy BFN1 Part 4. For example, the strategy could provide temporary community meeting spaces, informal training and learning spaces, temporary rehearsal spaces, pop-up shops and exhibitions, and so on. They can offer space to test innovative ideas and empower the local community, lasting just a few days or longer, until a permanent occupier is secured. The Vacancy Prevention Strategy should outline how units remaining or falling vacant for longer than 3 consecutive months will be marketed for temporary occupation, while explicitly recognising that the landlord is looking for a tenant that will take a commercial lease of the premises. The strategy should include consideration of: • Clear recommendations on the appropriateness of buildings to host different meanwhile uses and what support packages are provided for fit out, according to each use type. • Level of fees for businesses, ensuring that they are affordable to local start-ups, and typically fee-free for local community groups. Service charges and utility costs should not be passed on to the temporary occupier(s). • Marketing arrangements, e.g. through partnership with local business incubator or start-up programmes, and local community groups and voluntary organisations, and considering the following priority order: local independent businesses and local community groups, followed by other Newham-based charities, followed by other Newham-based businesses. • Monitoring and review mechanisms to ensure effectiveness of the strategy proposed.

HS2.6	For phased development, the Vacancy Prevention Strategy should address the overall vision/masterplan at an in-principle level, with detailed considerations focused on the detailed elements of the scheme and as proportionate to the delivery timeframe. Each subsequent stage (reserved matters applications) delivering floorspace in main town centre uses will need to submit an amended strategy covering both the scheme subject to the assessment and the parts of the scheme already delivered, in a coordinated way. The revised strategy should include monitoring information and any lessons learned from the implementation of a prior approved strategy, where relevant.
HS2.7	The Marketing Strategy will provide: • Evidence demonstrating an understanding of the demographic profile of the population in the catchment and resulting likely formats that may be successful; or statistically sound surveying within the catchment identifying households' preferences and needs, e.g. as part of a co-design process. • Evidence demonstrating understanding of local footfall patterns and trip generation patterns and how these inform shopfront location, making them more likely to be desirable locations for businesses. • Business demand information for the specific uses proposed, including operational and fit-out needs, and demonstration of how the proposed development and subsequent management would respond to the evidence. Where the site is in a town centre or delivering a new/expanded local centre, the Marketing Strategy should demonstrate a range of operators have been approached to promote a diversity of offer in the centre, for example butchers, florists/garden centres, bulky goods retailers, DIY goods retailers as well as the more typical food and drink and apparel retailers.

HS2.7	For outline applications and follow-up phases of hybrid applications, a site-wide Marketing Strategy should be prepared to help justify the wider masterplan. An updated Marketing Strategy should be submitted for each reserved matters application, informed by monitoring of the implementation in earlier delivered phase(s). Any remaining vacant units within prior delivered phases should be carried forward as part of the revised Marketing Strategy. For pre-application discussions, an outline/early scoping of the Marketing Strategy should be submitted with the initial information pack, and its methodology and assumptions tested and agreed as part of the pre-application process.
HS2.8	'Publicly accessible', when describing drinking fountains or toilets, also means provision within buildings, as part of the operation of other uses. In these cases, signage integrated in the shopfront should signal their availability to non-customers, and hours of operation. Signage should be designed in line with Local Plan Policy D5. An off-site financial contribution towards enhancing access to publicly accessible drinking water fountains, toilets and baby changing/nursing facilities, through the creation of new ones or enhancement of existing facilities in the centre the site relates to, may be secured through a legal agreement, and will include maintenance costs. Where major development contributes to a new or expanded town and local centres, the requirements of this policy must be delivered on-site, and should be masterplanned as part of the phased delivery of a wider site allocation.

HS2.9	The principles and objectives of public realm net gain are set out in Local Plan Policy D2. Pavements should be generous and designed to comfortably and safely manage high footfall levels, and include enlarged pavement for 'spill-out' space in front of clusters of food and drink leisure or cultural uses or community facilities such as libraries. Providing at least one small local square is encouraged along pedestrian-busy major roads, and could include meeting/gathering points, areas of respite or play, and potential for outdoor meanwhile uses such as markets or local cultural events. The Newham Characterisation Study (2024) Chapter 9 Borough-wide Design Principles includes further design recommendations (primarily under section 9.2.1 Provide local uses that support 15minute neighbourhoods). Wayfinding and digital infrastructure (such as USB charging points and Wifi hotspots) incorporated into the public realm of centres is encouraged, and should ensure these are located and designed for safe access during the day and at night, with particular attention to designing for comfortable use by women and girls. Early engagement should take place with the Council's Highways, Public Realm Management, and Regeneration teams to help identify opportunities where correlating designs or pooling resources would add value to planned public sector investment in the public realm of the respective centre.

Evidence base

- Retail and Leisure Assessment, Urban Shape Planning Consultants (2022) and appended topic papers (2024)
- High Streets and Town Centres Good Growth by Design – Adaptive Strategies, Greater London Authority (2020)
- Meanwhile Uses for London: A Research Report For The Greater London Authority, Arup (2020)
- Vacant Ground Floors in New Mixed-Use Development, Greater London Authority (2016)
- Authority Monitoring Reports, London Borough of Newham
- The Decline of the Great British Public Toilet, The Royal Society for Public Health (2019)

Policy Links

Local Plan:

- BFN1: Spatial Strategy
- HS1: Newham's Town Centres Network
- HS4: Markets, and events/pop-up spaces
- HS5: Visitor Evening and Night Time Economy
- D1: Design Standards
- D2: Public realm net gain
- D5: Shopfronts and advertising
- D6: Neighbourliness

London Plan 2021:

- SD7: Town Centres: development principles and Development Plan Documents
- E9: Retail, markets and hot food takeaways

Policy HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services

1. Small food stores meeting all the below criteria will be protected in Edge-of-Centre and Out-of-Centre locations, unless marketing evidence demonstrates no current or future demand for the site:
    a. the site is a 'corner plot'; and
    b. the site is outside of the 400 metre radius of any Newham Town Centre Network designation; and
    c. there are no other corner food stores within a 400m radius around the site.

In all other circumstances, proposals for full loss of floorspace in retail (Ea), restaurants and cafes (Eb) and services (Ec) uses in edge of centre and out of centre locations will be supported, where replaced with alternative development in line with the policies of the Plan.

2. Proposals for introduction of new, or retention, re-provision, or intensification of retail (Ea), restaurants and cafes (Eb) and services (Ec) uses in edge of centre and out of centre locations will need to be supported by a Sequential Test. In the limited circumstances outlined below and where the total floorspace for the use is below 300sqm GIA, the submission of a sequential test will not be required, where:
    a. The site is a listed or locally listed building with a historic non-residential use, and the proposal protects the asset's significance and helps secure viable use; or
    b. The site is within an undesignated sections of high streets (as mapped by the Greater London Authority) and the use provides financial or business services (Ec); or
    c. The site is within a park and the proposed use is as a restaurant or café (Eb); or
    d. The proposal is for the retention or re-provision of an existing use on sites of 0.25ha or below and it can be demonstrated that the site provides opportunity for design-led residential intensification, but that site constraints limit ability to provide a good quality residential use at ground floor.

3. Proposals in Neighbourhood Parades, edge of centre and out of centre locations resulting in 300sqm GIA or more of new or expanded floorspace in retail (Ea), restaurants or cafes (Eb), will need to be supported by a retail and/or leisure Impact Assessment.

4. For proposals incorporating retail (Ea), restaurants and cafes (Eb) and services (Ec) uses that are deemed acceptable following assessment against Part 2 of this policy, and Part 3 where proposing 300sqm GIA or more, the Council will seek to:
    a. Limit the range of use classes consented, in order to achieve the objectives of this Plan to avoid the proliferation of main town centre uses outside of town or local centres and promote consolidation within designated areas.
    b. Where the Impact Assessment demonstrates no significant adverse impact and the relevant floorspace thresholds of Local Plan Policy HS2 are met, require the submission and approval of an adequately resourced Vacancy Prevention Strategy or/and Marketing Strategy.



Justification

3.92 The NPPF defines the 'town centre first' approach which directs main town centre uses to within the boundaries of centres identified in the Local Plan.

3.93 Redevelopment of sites in edge of centre and out of centre locations towards residential uses will benefit nearby town and local centres by helping concentrate investment in centres, where business clustering will provide additional benefits, and an increase in footfall from new residential development.

3.94 Nevertheless, in certain cases it may be appropriate to retain main town centre uses outside of designated areas. While many sections of historic high streets are now designated as part of the town centre network, substantial sections remain unprotected. Research by the Greater London Authority as part of the London Plan (2021) demonstrates that these historic high streets provide a supply of affordable floorspace for Newham's small businesses or voluntary groups, and opportunities for social interaction within neighbourhoods. These sections of non-residential development need to be managed in a way that respects the 'town centres first' principles by ensuring a clearly differentiated character to that of designated centres and parades – this means less focus on retail and leisure and more focus on business, including financial and business services (Class Ec). Local Plan Policy SI2 and J1 provide further criteria under which main town centre uses may be reasonable outside of a designated section of Newham's Town Centres Network.

3.95 In parts of the borough, historic residential terraced estates have traditionally included corner shops, and these can continue to play an important role in widening access to day-to-day food shopping in neighbourhoods where residents live further from areas designated as part of Newham's Town Centre Network.

3.96 It will also be important to preserve and enhance the significance of heritage assets, particularly where part of their significance comes from an original non-residential use. In such cases, a main town centre use or community use can help ensure a viable future for the asset as well as a sustained level of public access to that asset.

3.97 The Impact Assessment threshold for retail (Ea) and restaurants and cafes (Eb) remains at 300sqm GIA, in line with the recommendation of the Retail and Leisure Study (2022), in order to help protect the smaller local centre destinations that are essential to good quality of life within many of Newham's neighbourhoods.

Implementation

HS3.1	Small corner convenience shops which help address gaps in the 400m radius coverage of the Newham Town Centres Network will be protected from loss where there is no other similar provision within 400m of the site. Where loss is proposed for a corner food shop meeting the policy protection criteria, evidence must be submitted to demonstrate that the site has no realistic prospect being used as a convenience store in the foreseeable future. The marketing evidence should include: • 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 • 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 • a record of all expressions of interest received with full reasons given as to why any offer was not accepted.

HS3.1

Nevertheless, proposals for their expansion resulting in a cumulative floorspace of over 300sqm gross GIA will need to demonstrate no significant impact on Newham's town and local centres through the submission of an impact assessment in line with Part 3 of this policy.

Developments retaining a suitable corner food shop will be subject to change of use limitation conditions in line with Part 4, and will also include a condition to limit the sale of goods to primarily (at least 65 per cent of shop floor) convenience goods. This will support the objective of creating accessible healthy food environments within Newham's neighbourhoods, while recognising the limited growth in comparison shopping required over the Plan period and the need to consolidate this type of provision within town and local centres.

Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan Policy J1. In most other instances, residential development opportunity of the site should be optimised in line with Local Plan Policy D3, unless directed otherwise by policies in this Plan.

While the council supports the loss of retail and leisure in out of centre locations towards other uses compatible with the spatial strategy of the Local Plan, the Council also recognises that established retail parks in the Beckton area help to meet existing, often specialist retail needs. The Council may accept proposals for the asset management of existing retail parks that meet relevant quality criteria set out in this Plan and that:

- Demonstrate optimisation of the existing built form (e.g. through introduction of a mezzanine or other internal alterations) for the benefit of specific occupier(s); and

HS3.1

- Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centres within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.

HS3.2

Planning applications for the development of retail (Ea), restaurants and cafes (Eb) and financial and business services (Ec) will need to demonstrate compliance with the sequential test of the NPPF and London Plan (2021) Policy SD7. Intensification of use also includes development of ancillary functions (e.g. storage and yard facilities) that would together be counted as a single unit for the purposes of business rates valuation.

Information must be submitted through a sequential test at validation stage. Where pre-application advice is sought, applicants are strongly encouraged to also submit the information at this stage. The information should follow the content and methodology guidance set out in the national planning guidance.

The 'area of search' should be based on operational business requirements (which can include the need to service a particular catchment), and should not be based on distance from the location of the proposed site.

HS3.2	On sites where a sequential test is deemed to be met through an exemption set out in this policy, the Planning Statement should state under which policy part the exemption is sought and: • In the case of a designated or non-designated heritage building, a historical significance assessment demonstrating the building was originally designed for non-residential use, and why significance would be lost through conversion to residential only (e.g. loss of internal features or a high quality historic shopfront); and a viability statement demonstrating the viability of the proposed use for the site. Or • In the case of residential intensification of small sites meeting the design-led approach of Local Plan Policy D3, the need to retain or re-provide a non-residential ground floor use should be justified through robust testing of alternative layouts demonstrating that the site constraints would not allow for the housing quality criteria of Local Plan Policy H11 and the neighbourliness criteria of Local Plan Policy D6 to be met at ground floor level. For example, and non-exhaustively: - The site can only reasonably accommodate a single staircase, excluding the potential of a duplex/multi-storey residential unit. Or - Introduction of a residential unit at ground level would either not be able to meet space standards requirements; or enlarging the ground floor floorplate to do so would result in amenity conflicts, including potential loss of privacy to the proposed unit through an inadequately sized defensible space fronting the public realm.
HS3.3	Planning applications for the development of 300sqm or more of retail (Ea) and restaurants and cafes (Eb) uses, which are not within a defined centre (including the preferred boundaries of future local centres), will need to be supported by an impact assessment following the guidance set out in the NPPF and London Plan (2021) Policy SD7. Impact Assessments submitted will be assessed by the Council and may require additional information to evidence that the assumptions made within the study are reasonable and reflect market conditions. Where the assessment leads the Council to reasonably conclude that a likely significant harmful impact may result from the proposed development, the proposal is likely to be refused.
HS3.4	A condition restricting change of use within sub-use-classes of Use Class E (Commercial, Business and Service) may be deemed necessary where there is a likely different impact on town centres, the transport network or on local amenity as compared to the specific sub-use-class proposed. The requirements for a Vacancy Prevention Strategy and Marketing Strategy, including respective thresholds, are addressed under Local Plan Policies HS2 Part 6.b and Part 7.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- Vacant Ground Floors in New Mixed-Use Development, Greater London Authority (2016)
- Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- HS1: Newham's Town Centres Network
- D5: Shopfronts and advertising
- D6: Neighbourliness
- H11: Housing Design Quality
- J1: Employment and growth
- SI2: New and re-provided community facilities and health care facilitiesSI4: Education and childcare facilities

London Plan 2021:

- SD7: Town Centres: development principles and Development Plan Documents



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Policy HS4: Markets and events/pop-up spaces

1. Development impacting on an existing indoor or outdoor market site will only be supported where:
    a. The number of pitches is maintained or increased, alongside provision of appropriate storage and servicing facilities, both during development (including temporary arrangements) and upon completion. And
    b. The overall layout, visibility, quality and management of the market and its public realm will be improved through co-design, taking into account the existing character of the market. And
    c. Proposals identify and positively contribute to the health and social value of the market, in line with Policy BFN3.

2. The use of buildings and suitable public spaces or courtyards within town or local centres for temporary events/pop-ups, including pop-up markets, is encouraged, subject to all of the following:
    a. There are no significant adverse amenity and transport impacts.
    b. The significance of heritage assets is protected.
    c. Health and wellbeing is promoted through proposed activities, and cumulative impacts of uses controlled under Local Plan Policy HS6 are addressed.
    d. Where the proposed floorspace is greater than 300sqm gross GIA, public engagement should be used to co-produce the type and range of activities.

3. Permanent new markets or short-lease flexible use or event spaces will be supported within town or local centres where all of the following criteria are met:
    a. The building and/or space are well designed, with accessible legible entrance points, and the development contributes to the quality activation of the public realm.
    b. There is a demonstrated market demand, or through temporary use testing of the concept over a period of at least 12 months.
    c. It is supported by an adequately resourced Pop-ups and Markets Management Plan; in the case of a new market, this should also demonstrate how positive social value potential is optimised, in line with Policy BFN3.
    d. There are no adverse amenity and transport impacts.

Justification

3.98 Newham's markets actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the high streets they are located in. The town centre health checks and analysis of the Retail and Leisure Study (2022) demonstrates they are key attractors to town centres that are highly valued by local customers and those from further afield – Queens Market in Green Street Town Centre in particular.

3.99 In addition to markets, the policy continues to support temporary and ongoing pop-up/idea incubator spaces offering short-licence, affordable and flexible premises (or outdoor spaces) for local entrepreneurs, to enable ongoing innovation in the offer of town and local centres.

3.100 Food offer of markets can play an important role in extending access to fresh and good quality food for local people. Markets offering hot food are also increasingly popular, however must be carefully managed so as not to create new concentrations of hot food takeaways or contribute to existing areas of cumulative impact (Local Plan Policy HS6).

Implementation

HS4.1

A pitch is defined as a 3 by 3 meters area, unless otherwise agreed with the Council, in consultation with its Markets operations team.

Appropriate facilities should include adequate access to parking and unloading space, storage, waste facilities, public toilets, and utilities including suitable voltage electricity supply where hot food service will be part of the market offer.

Any redevelopment of or adjacent to a market will be used as an opportunity to:

- rectify any existing poorly functioning physical aspects of the market (e.g. entrances, layout, visitor circulation, quality of materials and servicing layouts), through co-design with market traders, users and the market operator in line with policy BFN2.
- Protect or mitigate the microclimate of the market (e.g. wind or overshadowing) in line with Policy D6.
- Respond to the social and health value of the market, in line with the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3.
- Revise or create a Market Management Plan that addresses any temporary market arrangements, where relevant, and the permanent functioning of the market. This should incorporate all relevant management aspects set out in implementation section HS4 Part 3.

Public realm enhancements should be considered as per Local Plan Policies D2 and Policy HS2 Parts 7 and 8.

HS4.2

Temporary markets and pop-up events spaces are encouraged in town or local centres in all neighbourhoods, recognising the important role they can play for the vitality of the centres and the wellbeing of local residents, and particularly where there is no current permanent market provision.

Many temporary activities can be achieved through a Temporary Event Notice (TEN) type of licence. Application of this policy will therefore usually only relate to intensifications of such activities beyond the time limits (currently 26 days per year) and activity types or scales permissible (e.g. a maximum of 499 people in attendance including staff) under a TEN. Evidence of the success of a TEN may be submitted in support of the application as part of the Planning Statement, including information from resident/visitor feedback as a form of public engagement.

Where developments provide floorspace larger than 300sqm, applicants should seek to engage local residents in the development of the offer of the pop-up or market space, for example seek feedback on the type of goods on sale, the days and hours of operation, sustainability in the management of the space. This information should be submitted with the application as part of a Community Engagement Statement.

Protection of heritage assets will be achieved in line with Local Plan Policies D7 or D9, as relevant to the site and the type of development proposed. Temporary activation of vacant heritage assets that are on the Heritage at Risk Register (as identified by Historic England) may be beneficial in raising awareness about the significance of the asset and may help identify a suitable long term use. However, any temporary structures required to accommodate the pop-up activity should be self-supporting, well designed and sensitively integrated, and any non-fixed or sensitive features (e.g. paintings, fabrics) that add to the significance of the asset should be protected.

HS4.2	The temporary use should not exacerbate existing cumulative impacts. Temporary hot food pop-ups or market operators must not operate on-site for more than two days a week and should be required through their Market Trading Licence clauses to sign up to recognised healthy food standards. Convenience retailers should be encouraged to also do so, in line with Local Plan Policy HS6. See implementation of part 3 for the Pop-ups and Markets Management Plan requirements. The management plan should demonstrate how these have been achieved, proportionately will be if the temporary use is proposed for less than 5 years. The principles set out in Local Plan Policy BFN1 Part 8 should also be addressed, where relevant.
HS4.3	Applications for permanent short-lease flexible use or event spaces should be supported by information clarifying the range of uses proposed. Evidence submitted through the Planning Statement should demonstrate successful take up of the space/pitches over the preceding 12 months. 'Successful take-up' means that the site was managed and marketed so that the space (or at least half the number of market pitches) was not vacant for more than a month, excluding any renovation or fit-out times. A list of expressions of interest from businesses and community groups may be submitted as evidence, alongside records of the operation of the space over the preceding 12 months. Applications for permanent new markets will be assessed against the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3 Part 2, and emerging recommendations for optimising positive impacts should be incorporated into the Market Management Plan.

HS4.3	The Pop-ups and Markets Management Plan submitted should address: • The principles of the Vacancy Prevention Strategy (in line with Local Plan Policy HS2), detailing any lessons learned during any testing of concept over a period of 12 months preceding application. • In the case of new markets, how appropriate storage and servicing facilities are integrated, and how waste will be minimised and managed. • How any cumulative impacts will be managed. Short-lease hot food takeaways or gambling premises as part of the use of buildings will not be permitted in areas of existing cumulative impacts (defined by Local Plan Policy HS6). Operators of markets including a hot food offer must ensure that: - no more than half of all market stalls may operate as hot food stalls; and - all hot food stall operators will be expected to sign up to London Healthier Catering Commitment as part of their Market Trading Licence and in line with Local Plan Policy HS6; and - the market may provide a temporary hot food offer for no more than 2 days a week, or otherwise the market does not lead to the creation of a hot food takeaway over-concentration area (in line with policy HS6, where the market is considered a single hot food takeaway for spatial purposes). • How neighbourliness, including perceptions of safety, will be achieved and maintained (in line with Local Plan Policies D6 and HS5). • How transport impacts, including of any events beyond the usual operation of the site, are mitigated through a Travel Plan. • The use of outdoor space on non-market/non-event days, avoiding use as car parking.

- Public realm enhancements and maintenance, including signage, information and promotion of the offer (Local Plan Policies D2, D5 and HS2 Part 9).
- How traders/businesses will be supported to take up space/a stall, and to promote, present and improve their offer. Promotion of and support with adopting sustainable business practices as part of lease agreements is strongly encouraged.
- How customer feedback will be sought, reported to the Council at least once a year, and used as a basis for reviewing the management plan.

The Pop-ups and Markets Management Plan will be shared with the Council's Regeneration, Public Health and Public Realm Management teams, as relevant, and may need to be amended to address any comments or objections received. At pre-application stage, where relevant, a summary content for the plan should be submitted.

It is expected that the provisions of the management plan will be applied for the life of the development. If there are any changes, the local planning authority will need to be notified in writing. Any changes to management plans may require further consultation with relevant stakeholders.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- High Streets and Town Centres Good Growth by Design – Adaptive Strategies, Greater London Authority (2020)
- Vacant Ground Floors in New Mixed-Use Development, Greater London Authority (2016)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- HS2: Managing new and existing town and local centres
- HS5: Visitor evening and night time economy
- D1: Design standards
- D2: Public realm net gain
- D5: Shopfronts and advertising
- D6: Neighbourliness
- D7: Conservation Areas and Areas of Townscape Value
- D9: Designated and non-designated buildings, ancient monuments and historic parks and gardens

London Plan 2021:

- SD7: Town Centres: development principles and Development Plan Documents
- E9: Retail, markets and hot food takeaways



Policy HS5 Visitor Evening and Night Time Economy

1. Newham's network of town centres will be supported to become successful Evening and Night Time Economy Zones, of a scale as set out in Table 4.

2. Within the Evening and Night Time Economy Zones, subject to centre-specific scale in the hierarchy and local character, visitor-focused uses are encouraged, and, subject to Licensing rules, may operate into the evening and at night, helping create safe, accessible, welcoming and vibrant zones of evening and night time activity.

3. Visitor-focused evening and night time economy uses within local centres should be less prominent, with proposals for such uses considered on a case by case basis and cumulatively accounting for no more than 25 per cent of all units in that local centre. Elsewhere in the borough, visitor night time economy uses operating post 11pm will not be supported.

4. Development integrating visitor evening and night time economy uses should:
    a. Be designed for the intended late hours of operation, supported by a proportionate and adequately resourced Evening and Night Time Operation Management Plan.
    b. Minimise inactive and opaque frontages at any time of the day or night.
    c. Contribute to the creation of a welcoming, inclusive and safe after-dark environment for visitors and night time workers.
    d. Be designed to minimise amenity impacts, particularly noise and light overspill.
    e. Where major development is proposed, contribute to night time public transport enhancements.

Table 4: Newham's Evening and Night Time Economy Zones

Town Centre	Existing Evening And Night Time Economy scale[11]	Aspiration Evening And Night Time Economy scale	Existing character description	Potential visitor base
Stratford	Regional significance (London Plan recognised cluster level NT2).	Regional significance	Culture and creative industries, including theatre, music and events. Leisure and culture tourism. Higher education cluster.	Local residents, students, visitors and tourists, and workers.
East Ham	Emerging	Local	Dining, events, market. 6th form education cluster.	Local residents, students, workers and visitors.
Canning Town	Emerging	Local	Dining, market. Music industry. Relationship to City Hall and Excel.	Local residents, Excel visitors, and workers.
Forest Gate	Emerging	Local	Dining, market.	Local residents and workers.
Green Street	Emerging	Larger than local (level NT3)	South-Asian cultural events. Market activities.	Local residents, workers and visitors.
East Beckton	n/a	Local	n/a	Local residents and workers.
Beckton Riverside	n/a	Local	n/a	Local residents and workers.

[11] Where the latest London Plan sets out changes to the existing scale of the evening and night time function of a centre, this will supersede those set out in this table and the aspiration will align with a retention of the identified function.

Planning Obligations

- Financial contributions towards improving night time public transport, delivering and sustaining local safety projects, and/or creating public facilities for night time workers and visitors (e.g. toilets, device charging point, information centres) may be secured.

Justification

3.101 London Plan (2021) Policy HC6 encourages boroughs to develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity such as town centres.

3.102 Proactively managing the visitor evening and night time economy can lead to benefits such new jobs, the diversification of the leisure and tourism offer in centres to support their vitality and viability, and more opportunities for social interaction. Further focusing investment in the public realm, alongside partnership working with businesses and key organisations, can promote a safer environment in centres and on night time public transport.

3.103 Consultation responses have identified a desire for more evening leisure provision, and particularly for evening cultural activities and family-friendly activities. The household survey undertaken by NEMS Market Research as part of the Retail and Leisure Study (2022) identified the most popular leisure activities across Newham's households, with the most frequent being cinemas (35.8 per cent), cafés (35 per cent) and eating out/restaurants (33.4 per cent in the evening and 30.9 per cent in the daytime). There are only two cinemas in Newham, both in Stratford, which means that most people will travel longer distance and sometimes out of borough for this type of leisure activity.

3.104 Stratford is a popular destination for cafes and restaurants for all residents of the borough, particularly those living closest. Cafes and restaurants in East Ham and Forest Gate are also popular. However, the food and drink leisure offer and attractiveness elsewhere in the borough is limited, with many people traveling to alternative destinations outside the borough such as Canary Wharf, and Barking and Ilford Town Centres. Central London/West End remains a popular destination for all residents, but residents living closer to Newham's centres with a suitably established offer are traveling less outside of the borough.

3.105 This policy seeks to promote a vibrant evening and night time visitor economy within Newham that is accessible and reduces the need to travel out of borough for these activities, while mitigating amenity and safety concerns. Evening and night time economy uses within local centres will be more limited and, and will be resisted elsewhere, in order to support the more residential character of the areas they are a part of, and recognising the often the more limited public transport accessibility of these smaller designations.



Implementation

HS5.1 The London Plan (2021) Policy HC6 defines three scales of evening and night time economies, of which the following are relevant to Newham:

- NT2 – Areas of regional or sub-regional significance. These are areas that attract visitors from across and beyond London, and often have one or more larger venues and a mature night-time economy. In Newham, this is the role of Stratford Town Centre. It will remain the main destination in the borough for visitor focused Evening and Night Time Economy activities and will continue to be supported to continue to operate at a regional scale.
- NT3 – Areas with more than local significance. There are areas than draw visitors from other parts of London and tend to feature smaller venues and premises. Currently, there are no centres that fulfil this role in Newham, but there is an aspiration to achieve this level for Green Street, capitalising on the area's fashion, jewellery and wedding businesses cluster.

Smaller scale, local areas of evening and night time economy activity which draw visitors primarily from Newham will be encouraged in Newham's other town centres – East Ham, Forest Gate, Canning Town, East Beckton and the future centre at Beckton Riverside. The character of these night time zones may evolve further to a specialist focused, subject to masterplanning and multi-agency strategic action.



HS5.2 The visitor evening and night time economy uses below were identified through engagement with residents on the type of leisure and cultural activities they would like to see promoted as part of a quality Evening and Night Time Economy in Newham's town centres.

Table 5: Visitor-focused Evening and Night Time Economy uses

Evening And Night Time Economy uses	**Use Class**
Restaurants and cafes	E(b)
Pubs and bars	Sui Generis
Specialist and food markets	E(a) or Sui Generis
Outdoor pop-up events	Sui Generis
Cinemas and Theatres	Sui Generis
Concert Halls, Dance Halls and Live Music Venues (not pubs)	Sui Generis
Night Clubs	Sui Generis
Museums and Art Galleries	F2
Gyms and other indoor leisure uses	E(d) or F2

Hot food takeaways and gambling premises, due to reduced opportunities for social interaction and higher risk of antisocial behaviour in public spaces, are not considered evening and night time economy uses suitable to be promoted through this policy. They are addressed through Local Plan Policy HS6.

Applicants should set out in their Planning statement the intended hours of operation for each of the units proposed to function within any of the visitor evening cnd night time economy uses identified.

HS5.3	Generally, visitor evening and night time economy within local centres should be limited to sale of food and drink to be consumed primarily on premises, including pubs, and the overall number of units in such uses operating past 11 p.m. should not amount to more than 25 per cent of all uses. The Planning Statement or Design and Access Statement should provide an evidenced justification as to why the use(s) and the scale are appropriate for the respective local centre, which should include survey information of the use and hours of operation of visitor focused evening and night time economy operating units in the local centre. In neighbourhood parades and out of centre locations the operation of businesses after 11pm will not be permitted, in order to: • Safeguard residential amenity; and • Help concentrate evening and night time economy uses in the centres, where they can be managed to better effect cumulatively, including optimising impact of investment into night time public transport and safety interventions.
HS5.4	Active ground floor uses and illuminated building frontages play important roles in animating streets and other public spaces after dark and promoting a feeling of safety through natural surveillance. Conversely, dark, inactive, shuttered and blank frontages can reduce active frontages and compromise the legibility of the streetscape and create perceptions of an unsafe environment. It is therefore important that main town centre uses are designed with consideration of their impact during the day and at night, irrespective of opening hours, in line with Local Plan Policies D5 and D6.

HS5.4	In addition, developments should be supported by an Evening and Night Time Operation Management Plan demonstrating how their late operation can proactively: • Help promote safety and inclusivity after dark, on site as well as on the public realm routes most frequented by visitors. • Mitigate noise, odour and other nuisances generated in outdoor spaces, including gardens and al fresco seating areas. Licensing and Environmental Health should be consulted on the proposed content of management plans. Newham Community Safety Management team should be consulted to identify suitable local community safety schemes that the Evening and Night Time Operation Management Plan can support/sign up to. Newham Highways and Transport for London should be consulted in relation to opportunities to improve night time public transport connectivity and safety of Evening and Night Time Economy Zones.



Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022
- High Streets and Town Centres Good Growth by Design – Adaptive Strategies, Greater London Authority (2020)
- Developing a Night Time Strategy, Greater London Authority (2020)

Policy Links

Local Plan:

- HS2: Managing new and existing town and local centres
- HS6: Health and wellbeing on the high street
- D1: Design Standards
- D2: Public realm net gain
- D5: Shopfronts and advertising
- D6: Neighbourliness
- T2: Local Transport

London Plan 2021:

- HC6: Supporting the night-time economy
- SD7: Town Centres: development principles and Development Plan Documents
- E9: Retail, markets and hot food takeaways



Policy HS6: Health and wellbeing on the High Street

1. Borough-wide, development must avoid over-concentrations of gambling premises (betting shops, casinos and adult gaming arcades are all under this category) and hot food takeaways by ensuring that none of the following linear and area concentration limits are exceeded:
    a. There is a separation distance of at least two units in other uses between any units in the specified uses; and
    b. There are no more than three gambling premises within 400 metres of each other; and
    c. There are no hot food takeaways within 400 metres of the entrance points to any primary or secondary school, or there are no more than three hot food takeaways within 400 metres of each other; and
    d. A 400 metres catchment drawn around a proposed specified use does not overlap with more than two other catchment areas drawn around existing or approved units in the same specified use/category; and
    e. Hot food takeaways should not account for more than 3 per cent of all units within any town centre and no more than 5 per cent of all units within any local centre; and
    f. Gambling premises should not account for more than 2 per cent of all uses within any town or local centre.
2. Where new or intensified hot food takeaways are acceptable, the operator will be expected to secure and maintain Healthier Catering Commitment for London accreditation (or other similar standards).

3. Where proposals for new or intensified proposals under the following uses are acceptable – gambling premises, payday loan shops (Sui Generis), pawnbrokers (Ec) and other similar uses – will be required to:
    a. display of information about any applicable interest rates, fees and charges, and display of information about local credit unions, debt advice services and/or gambling addiction charities; and/or
    b. sign up to, and operate in compliance with, any scheme(s) which promotes community safety and/or other good practice.

4. New or intensified convenience retail (use class E(a)), and food and drink leisure (use class E(b), Sui Generis pubs or bars, or where ancillary to other uses), should help promote a healthy food environment through partnership working, and demonstrating a commitment to supporting healthy food choices by signing up to relevant food industry standards.

Planning Obligations

- Financial contributions delivering and/or sustaining local projects promoting local safety and security interventions may be secured.

Justification

3.106 There is an ongoing need to create a healthy food and drink environment, addressing affordability and access, to support the delivery of the 50 Steps to a Healthier Newham strategy (2024). Residents in Newham are affected by multi-morbidity at an earlier age compared to London and England, likely due in part to high levels of deprivation and adverse conditions. Age of onset is also highest in Asian and Black communities, and amongst females, meaning they are managing multiple long-term conditions from a younger age and over a longer period of time. Newham has high rates of nutrition related poor health in children, including low birth weight, decayed, missing and filled teeth and excess weight, compared to other London boroughs. Two-thirds of adults and 43% of children in year 6 are carrying excess weight. Newham has the third highest rates of excess weight in 10-11 year olds in London. The occurrence of obesity in nearly all cases of multimorbidity indicates the serious impact that this condition has on the health and wellbeing.

3.107 Public Health research indicates that increased access to healthy, affordable food for the general population is associated with improved attitudes towards healthy eating and healthier food purchasing

behaviour. Conversely increased access to unhealthier food retail outlets is associated with increased weight in the general population, and increased obesity and unhealthy eating behaviours among children residing in low income areas.

3.108 Public Health research[12] in relation to the harms of gambling activity have been growing in recent years, with problem gambling primarily associated with casino and bingo games, electronic gambling machines in bookmakers, sports and other event betting and betting exchanges. Harms associated with problem gambling are complex and extensive, ranging from crime and antisocial behaviour to health and socio-economic harms. People at the greatest risk of harm are more likely to be unemployed and living in more deprived areas, have poor health, low life satisfaction and wellbeing, and have an indication of probable psychological health problems. With Newham experiencing ongoing health and wealth inequalities, it is likely that its population are at higher risk of developing problem gambling behaviours than residents in other boroughs, further compounded by a higher prevalence of gambling premises than the national average as identified by the Retail and Leisure Study (2024).

3.109 Newham's residents continue to be concerned about the existing concentration of hot food takeaways and betting shops, and more recently adult gaming arcades. Planning policy has been in place since 2016, successfully restricting the exacerbation of existing hotspots and contributing to improved metrics in parts of the borough (e.g. Canning Town). However, many of Newham's historic high streets continue to experience significant over-concentrations compared to the national average. Therefore, the criteria policies have been taken forward and strengthened where land use survey work identified a potential for better outcomes to be achievable. More also needs to be done to tackle the health and wellbeing impacts of established uses. Planning policy can play a complementary role to the work of Public Health and Commercial Licensing teams in addressing these qualitative concerns, by promoting industry standards of operation that support more health-conscientious business models. The London Plan (2021) and the GLA's work towards developing and promoting the Healthier Catering Commitment standard is carried forward into this policy and strengthened, given the exacerbated health inequalities and above average concentrations of hot food takeaways that are evident in Newham.



[12] OHID (2023), Gambling-related harms evidence review: summary

Implementation

HS6.1	For the purpose of the concentration limits, betting shops, casinos and adult gaming arcades are all considered gambling premises as they have similar impacts and are subject to gambling legislation. The limits apply to them as a group/ category and not as individual uses. GIS mapping will be used to identify the location of all uses subject to controls and all schools (including permitted new schools) and their 400 metre radiuses. These will be updated every two years. The mapping should be used to assess clusters and overconcentration in line with policy criteria, unless more up-to-date information is submitted by the applicant. Changes between uses subject to control, e.g. from a takeaway to an adult gaming arcade or betting shop to a casino, will also need to satisfy the policy and will not be supported if contributing to persisting cumulative impacts. For the purposes of para e and f, the percentage points of the existing concentrations in the relevant town or local centre will be rounded to the nearest whole number before assessment, and at least 1.

HS6.1	For example, 5 per cent of 24 units would be equivalent to 1.2 units, rounded to 1 unit for the purposes of the policy application. In this case, a maximum of 1 hot food takeaway may be acceptable in a local centre of this size, as long as this would not result in an overconcentration of hot food takeaways under parts c or d.
HS6.2	A gain or retention of a hot food takeaway will be assessed against the cumulative impact criteria of Part 1 of this policy, and the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3, alongside any other planning matter relevant to the application. Where the use is deemed acceptable, the requirement for Healthier Catering Commitment will be secured in line with London Plan (2021) Policy E9, or a similar standard where justified and supported through engagement with Newham Public Health team.
HS6.3	A gain or retention of a gambling premises will be assessed against the cumulative impact criteria of Part 1 of this policy, and the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3, alongside any other planning matter relevant to the application. Pay-day loan shops (Sui Generis), pawnbrokers (Ec) and other similar financial operation use will be assessed against the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3, alongside any other planning matter relevant to the application. Newham Community Safety Management team should be consulted at pre-application stage to identify suitable local design improvements or community safety programmes that the development can contribute towards.
HS6.4	Commitment to supporting healthy food choices can be demonstrated by signing up to relevant industry standards such as Healthier Catering Commitment for London, Sugar Smart, Peas Please, or other similar local schemes. The Public Health team should be consulted for locally relevant recommendations of the most suitable standard to use.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- Well Newham, 50 steps to a Healthier Newham (2024)
- 50 Steps Evidence base, London Borough of Newham (2020)

Policy Links

Local Plan:

- BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing
- HS5: Visitor Evening and Night Time Economy
- D2: Public realm net gain
- D5: Shopfronts and advertising
- D6: Neighbourliness

London Plan 2021:

- SD7: Town Centres: development principles and Development Plan Documents
- E9: Retail, markets and hot food takeaways

Policy HS7 Delivery-led businesses

1. Proposals for new or intensified 'dark kitchens' and 'dark shops' will need to undertake a Sites Options Test that demonstrates available sites meeting the below priority have been considered and how they score against customer access optimisation and sustainable travel benefits:
    a. First on Strategic Industrial Land, Local Industrial Land and Local Mixed Use Areas;
    b. And second on suitable locations within site allocations, retail parks or other non-designated sections of high streets.
2. Proposals for new or intensified 'micro-fulfilment centres' will need to undertake a Sites Options Test that demonstrates available sites meeting the below priority have been considered and how they score against customer access optimisation, amenity impacts and sustainable travel benefits:
    a. First on Strategic Industrial Land, Local Industrial Land and Local Mixed Use Areas;
    b. Second on suitable locations within site allocations, retail parks or other non-designated sections of High Streets; then
    c. Last on sites within town or local centres outside of the primary shopping area;

3. Proposals for new or intensified 'dark kitchens' and 'dark shops' should demonstrate the following quality criteria:
    a. Where in a non-designated High Street location, maintain a quality shopfront and satisfactorily address any amenity impacts; and
    b. Provide accessible, safe facilities for couriers, including sheltered waiting space, toilets and secure cycle parking; and
    c. Be supported by an adequately resourced Travel Plan; and
    d. Help promote a healthy food environment through commitment to relevant industry standards as per Local Plan Policy HS6 Part 1.

4. Proposals for new or intensified 'micro-fulfilment centres' should demonstrate the following quality criteria:
    a. Where in a town or local centre, maintain a quality shopfront and offer collection/drop-off facilities.
    b. Where not in a town or local centre, collection/drop-off facilities will not be supported.
    c. When located within a town or local centre, or in a section of non-designated high street within 300m from the boundary of a centre, should secure operational capacity to provide servicing arrangements for more than one retail and/or leisure businesses within that town or local centre.
    d. Provide accessible, safe facilities for couriers, including sheltered waiting space, toilets and secure cycle parking.
    e. Be supported by an adequately resourced Travel Plan.

Justification

3.110 Online spending has become a firmly established method of shopping. Evidence demonstrates the continued growth of this sector in terms of those that have internet access and those that use the internet every day; the methods and modes used to undertake such transactions and the breadth of the population taking advantage of what is on offer, with the largest rise in the 65+ age group in recent years. Internet sales share of total retail surpassed 19 per cent in 2019 before rising to over 30 per cent in the second quarter of 2020, against less than 5 per cent in 2008. National data for 2022 indicates that online spending remains substantially higher than pre-Covid19 pandemic, at 26.6%, and has remained at this level for 2023, indicating trends may be stabilising at a higher average.

3.111 In the case of the food and drinks industry, the increased demand for deliveries from popular restaurants and cafes is leading to more demand for 'dark kitchens', where food is prepared on-demand in commercial kitchens with no customer access. Similarly, a significant rise in demand for same-day convenience goods delivery has led to the emergence of 'dark shops', where traditional shops are used for distribution purposes instead of being available for walk-in customers.

3.112 The Greater London Authority's research on High Streets: Adaptive Strategies (2020), highlights opportunities to plan for coordinated deliveries to centres through 'last mile' delivery/consolidation centres in order to reduce servicing vehicle numbers.

These local centres can then facilitate low-emission last mile deliveries (especially cargo-bike delivery). These micro-fulfilment centres may also benefit high streets by hosting local collection points for customers, which in turn may generate further linked trips.

3.113 Small changes in consumer behaviour could have significant cumulative impacts, particularly on travel patterns and amenity, which should be proactively and strategically managed. Therefore, this policy seeks to support dark kitchens, dark shops and micro-fulfilment centres in areas identified as suitable for employment or along high streets where their impacts on the town and local centres network can be managed. The Sites Options Test responds to the need to balance any transport or amenity impacts of the business with the optimal catchment for its operation. For example, where the intended catchment of the business is within a mile of its base of operation, cycle deliveries may be appropriate and therefore a high street location would generally be able to accommodate such a business. However, where the business is to be serviced by vehicles over longer distances, it may be more appropriate to locate such uses in more industrial locations.

3.114 The growth in delivery-led businesses has also resulted in more people taking up courier roles within the wider 'gig economy'. Reports[13] have highlighted the often poor working conditions for these workers, which are particularly exacerbated at night time when there are fewer services available for them to access. This policy is complementary to Local Plan Policies T3 and T4.

Implementation

HS7.1 and HS7.2	'Dark kitchens' and 'dark shops' (see Glossary) are modern reinterpretations of the hot food takeaway and the shop, and are therefore managed as part of the overall strategy for main town centre uses set out in this Local Plan section, while recognising their unique features. These will be considered Sui Generis uses. Similarly micro-fulfilment centres (see glossary) provide a last-mile delivery service, and are generally considered to be Use Class B8. However, where providing a walk-in parcel pick-up or drop-off service – for example the Royal Mail Delivery (Sorting) Office model – the use class becomes Sui Generis. The Site Options Test should set out the intended customer base in broad terms, e.g. referencing a poste code, alongside the intended mode of travel of the couriers and the maximum range of distance the couriers are expected to reach. This will help generate an Area of Search for suitable available sites, which is likely to intersect with employment designations (Strategic Industrial Land, Local Industrial Land and Local Mixed Use Areas), site allocations that support employment uses as part of the mix, high streets or retail parks that should be considered as suitable locations. The suitable locations should be assessed in terms of suitable access to the intended catchment, enabling sustainable travel patterns (in line with Local Plan Policy T3) and managing amenity impacts (in line with Local Plan Policy D6), and should demonstrate that the proposed site is an optimal and viable option.
HS7.3	Shopfronts, where their retention/provision is required, should fulfil the criteria of Local Plan Policy D5. The design of the 'dark kitchen' or 'dark shop' must also address safety and neighbourliness impacts, in line with Local Plan Policies HS5 Part 4 and D6, including through the provision of adequate accessible, safe facilities for couriers, comprising sheltered waiting space, toilets and secure (cargo-) cycle parking. A Travel Plan should be prepared to manage servicing of the site, staff travel planning, and arrangements to maximise courier deliveries by bike/cargo bike in line with Local Plan Policy T3.

[13] See for example, report by Autonomy (2021), Working Nights; Peter Timko, Rianne van Melik, (2021), Being a Deliveroo Rider: Practices of Platform Labor in Nijmegen and Berlin;

HS7.4

In order to safeguard the potential benefits of consolidated coordinated servicing of businesses in Newham's town and local centres, applicants whose proposals include micro-fulfilment centres within centres (existing or planned) or in edge of centres should submit evidence of early engagement with all retail businesses in the relevant centre, outlining services offered at competitive local market prices, and any expressions of interest received within three months of engagement.

Where interest from centre-based businesses is identified, the Design and Access Statement should provide information demonstrating how the scale and operation of the micro-fulfilment centre has been optimised in partnership with the relevant third parties. Where no interest is identified following engagement and the relevant closest centre is a town centre, capacity to service the storage and distribution needs of at least one centre-based SME retail businesses (operating from small units of 80-150 sqm GIA) should be designed for and protected. As a guide, the floorspace required should be similar to a typical internal storage space ancillary to small retail units, and at least 10sqm for each business. A Marketing Strategy will be secured to promote the space to businesses.

Shopfronts, where their retention/provision is required, should fulfil criteria of Local Plan Policy D5.

The design of the micro-fulfilment centre must also address safety and neighbourliness impacts, in line with Local Plan Policies HS5 Part 4 and D6, through the provision of adequate accessible, safe facilities for couriers, comprising sheltered waiting space, toilets and secure (cargo-) cycle parking.

A Travel Plan should be prepared to manage servicing of the site, staff travel planning, and arrangements to maximise courier deliveries by bike/ cargo bike in line with Local Plan Policy T3.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- High Streets and Town Centres Good Growth by Design – Adaptive Strategies, Greater London Authority (2020)
- The Potential for Urban Logistics Hubs in Central London, Steer (2020)

Policy Links

Local Plan :

- HS5: Visitor evening and night time economy
- D5: Shopfronts and advertising
- D6: Neighbourliness
- T3: Transport behaviour change
- J1: Employment and growth

London Plan 2021:

- E4: Land for industry, logistics and services to support London's economic function



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Policy HS8: Visitor accommodation

1. Hotels and other forms of visitor accommodation will be supported on sites in:
    a. Town and local centres where the function of the primary shopping area is protected in line with Local Plan Policy HS2, and principally within centres in Stratford and Maryland Neighbourhood as a key tourist destination; and
    b. Areas within 15 minutes walking distance to the ExCel conference centre.

2. The scale of development should be proportionate to the scale of the centre and/or the tourism or employment function of the area it services, as relevant to the site, justified by market demand testing and a Sequential Test if proposed in an out of centre location. The development should be supported by a Visitor Accommodation Management Plan outlining:
    a. How amenity and safety will be managed and maintained through the day and at night.
    b. A servicing plan.

3. All visitor accommodation should meet the accessibility standards set by London Plan (2021) Policy E10.

4. Any ancillary leisure main town centre uses or recreation and sports facilities, which are proposed to be made accessible to non-hotel visitors, should meet relevant policy criteria set out in this Plan, and a leisure Impact Assessment where the cumulative floorspace is more than 300 sqm GIA.

Justification

3.115 The 'Building Newham's Creative Future' Cultural Strategy (2022) seeks to put Newham on the map and promote it as a visitor destination, with a growing visitor economy and encourage footfall from beyond the borough boundaries. It recognises the importance of well-known anchor institutions that can unlock an area by attracting visitors who may spend their time exploring the borough, as well as encouraging inward investment into revitalising cultural infrastructure in nearby areas. Such institutions are increasingly establishing themselves in Newham as part of ongoing regeneration activity. These include large education, culture and leisure institutions in Stratford, and conference facilities at Royal Victoria Dock. Improving the availability and accessibility of visitor accommodation in line with the London Plan (2021) will support Newham's developing visitor economy. More broadly, the Council will continue to support Newham's economic growth and develop the tourism and leisure offer, cultural uses, and the evening/night-time economy, and generally develop and improve the business environment of town centres. Visitor accommodation will be an important part of the local offer to support the diversification of town centres.

3.116 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. Newham has seen high demand for hotel development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country[14]. Given the housing crisis, homeless households are at times placed temporarily in hotels or bed and breakfast accommodation[15], which are not suitably designed to meet day to day living needs for longer periods of time and can lead to significant health and wellbeing problems when people are required to wait a long time for suitable permanent accommodation. The Council has therefore taken a proportionate approach as part of this policy, seeking to balance visitor accommodation demand with the high need for general needs housing in the borough, in line with the approach set out in policy H1 Part 3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 2,192 rooms have already been delivered, with a further 1,085 in the pipeline as of 2021/22. The policy therefore requires market demand testing that reflects Newham's economic growth and tourism demand, to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.

[14] Trust for London, Housing and homelessness (2025) [15] National statistics for 31st March 2025 indicate that 394 homeless households were housed in B&B accommodation, 3,537 households were housed in nightly paid accommodation including some in apart-hotels, and 927 asylum seekers were placed in hotels in Newham.

Implementation

HS8.1	Visitor accommodation includes hotels, guest houses and serviced apartments (Class C1), which are identified by the NPPF as a main town centre use for their contribution to supporting footfall and a tourism economy within centres. The spatial strategy of this plan recognises the role of Stratford area as a key tourist destination, and the role of the Excel conference centre as a widely recognised conference centre. Applications for visitor accommodation, should be directed to these areas where they are supported in principle. In identifying 15min walking distance from the Excel conference centre, isochrones should be calculated in relation to the visitor entrance points of the Excel conference centre. This should be reflecting a detailed understanding of the actual walking conditions for a range of different users) of the site (e.g. accessibility for people with movement impairments, women-friendly routes), with the most accessible area chosen. Where the site does not meet the locational criteria – i.e. either in a town or local centre or within 15min walking distance of the Excel centre, the proposal will be considered to be out-of-centre and a sequential test will be required, in line with the NPPF . See also criteria set out in Part 4 of this policy.
HS8.2	Proposals for visitor accommodation should be scaled (in terms of bed spaces and wider on-site offer) to: • Reflect the role of the centre or tourist area they are located in. Proposals should be directed to Stratford, East Ham and Canning Town Town Centres, local centres with good connectivity to London City Airport, and the area of the Excel conference centre.

HS8.2	Green Street Town Centre may also suitably accommodate growth in visitor accommodation to reflect its aspiration for a wider than local visitor evening and night time economy. Other district centres and the local centres should see more modestly scaled provision targeting more local market demand. • Respond to up-to-date evidence of local or regional market demand. This could address: - proximity to major generators of demand, such as key tourist, leisure or employment destinations, reasonably linked to the site by public transport and active travel routes. And - hotel demand market research relevant to Newham's market context, published by reputable sources. And/or - written expressions of interest from hotel operators. And • Be well integrated within the site context, reflecting the requirements of Local Plan Policies D1, D2 and D4, and the capacity of the local transport network to accommodate servicing needs as per Local Plan Policy T2. When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location in relation to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that are considered to not be proportionate to the scale of the centre and/or the tourism or employment function of the area, or that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1 Part 3, will rarely be justifiable.

HS8.2	Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and will not be considered towards the evidence of demand for further visitor accommodation. Amenity impacts should be mitigated in line with Local Plan Policy D6 and reflect the typical 24 hour of operation of visitor accommodation. Considerations include impact on public realm use, servicing needs, drop-off and pick-ups arrangements and highways impacts. These should be addressed through the design of the scheme and through operational arrangements set out in a Visitor Accommodation Management Plan. Safety matters that should be addressed through the design of the scheme and in its Visitor Accommodation Management Plan include: • Safeguarding the privacy and safe operation of neighbouring uses, through careful consideration of the outlook of the hotel's windows and positioning of any external fire escape routes. • Contributing to the operation of local community safety schemes. • Safety and emergency procedures for the site, including to how antisocial behaviour reports will be handled. The management plan should outline necessary staff training, and how the procedures will be communicated to visitors. Newham Community Safety Management team should be consulted to identify suitable local community safety schemes that the management plan can support/sign up to.
HS8.3	Applicants are expected to comply with the requirements set out in the London Plan (2021) Policy E10. Developments should also demonstrate a wider commitment to inclusive design, going beyond wheelchair accessibility matters, through the application of inclusive design criteria set out by Local Plan Policies D1, D2 and D5.
HS8.4	Hotel provision regularly includes restaurant or bar ancillary uses that are often also made available for walk-in visitors. Where hotels are located in town or local centres, this type of provision can contribute to the offer and vitality of the high street, and should be scaled and designed to respond to the function of the centre and in line with Local Plan Policies HS2 and HS5 requirements. Where the leisure provision includes social infrastructure such as a gym, a swimming pool, or health spa that are available to non-hotel visitors, the provision should also respond to requirements of Local Plan Policies SI2-3. Where a hotel is proposed in an out of centre location and the sequential test is passed (including through the exemption provided by the policy for the area within 15 minute walking distance of the Excel conference centre), publicly-accessible leisure facilities on site will not normally be supported, and will require a leisure Impact Assessment if the proposed cumulative leisure floorspace is 300sqm GIA or more.

Evidence base

- Retail and Leisure Study, Urban Shape Planning Consultants (2022)
- High Streets and Town Centres Good Growth by Design – Adaptive Strategies, Greater London Authority (2020)
- Projections of demand and supply for visitor accommodation and accessible hotels rooms, Greater London Authority (2017)

Policy Links

Local Plan:

- HS1: Newham's Town Centres Network
- HS2: Managing new and existing town and local centres
- HS5: Visitor evening and night time economy
- D1: Design standards
- D2: Public realm net gain
- D4: Tall buildings
- D5: Shopfronts and advertising
- D6: Neighbourliness
- T2: Local transport
- SI2: New and re-provided community facilities and health care facilities
- SI3: Cultural facilities and sport and recreation facilities

London Plan 2021:

- E10: Visitor infrastructure



SOCIAL INFRASTRUCTURE

3.117 A neighbourhood's social infrastructure[16] is one of its greatest assets. Social Infrastructure can be thought of as an ecosystem of local organisations, networks and services[17]. These include both formal facilities (such as health and education provision) and informal spaces and services (such as pubs and social clubs), which all play an important role in supporting and enriching people's lives and provide important networks that make communities more connected and resilient.

3.118 The COVID-19 pandemic demonstrated just how crucial access to local social infrastructure is to our collective resilience and wellbeing. Building a Fairer Newham (2022) seeks to enable every resident to live in an accessible and inclusive neighbourhood which will provide all of their social, civic and economic essentials. Newham's Towards a Better Newham (2020), Social Integration Strategy (2020), and its cultural strategy - Building Newham's Creative Future (2022) call for a commitment to social justice by putting equity of health, wellbeing and access to culture at the heart of all policy making. This requires increased access to and the funding of social infrastructure, especially for early years, mental health services (especially for young people), youth services and access to cultural spaces and organisations[18].

3.119 The Local Plan must plan for all types of social infrastructure. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:

- Social infrastructure we have a statutory duty to provide: schools; some early years provision.
- Social infrastructure with a nationally set target: playing pitches; built sport and recreation facilities; health facilities.
- Council delivered social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres.
- Community/charity/market-led: wider youth provision; faith facilities; private built sport and recreation facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.

3.120 For social infrastructure we have a statutory duty to provide, or where there are national targets or a planned delivery by the Council, the Local Plan secures and supports this delivery through the neighbourhood policies and site allocations. The policies in this chapter are designed to enable community/charity/market-led community facilities to come forward in the most appropriate locations. This is to ensure that community facilities, of the type required, are delivered where they are wanted and where there is a provider to operate them.



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[16] See Glossary for definition of social infrastructure [17]Greater London Authority, Good Growth: Connective Social Infrastructure, https://www.london.gov.uk/sites/default/files/connective_social_infrastructure_0_0.pdf
[18] COVID-19 Marmot Review, https://www.instituteofhealthequity.org/resources-reports/build-back-fairer-the-covid-19-marmot-review and Andrews, S. and Duggan, P. (2021) Performance as City Pandemic Response: Invitations to Innovate, September 2021. Newcastle, UK: Performing City Resilience

3.121 A wide range of buildings and services deliver social infrastructure in Newham. To understand, protect and to guide the future development of Newham's social infrastructure we have undertaken a number of studies to inform our policy approach.

3.122 Newham's Community Facilities Needs Assessment (2022) provides an audit of the borough's existing community facilities and considers how the future growth of Newham's neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).

3.123 The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2025), Playing Pitch Strategy (2025), Places for All (2022), Childcare Sufficiency Assessment (2022) and though partnership working with Newham's Education, Parks and Leisure teams, NHS London Healthy Urban Development Unit (HUDU)[19] and NHS partners.

3.124 This chapter seeks to protect and promote social infrastructure, both those in public and private ownership, to meet the needs of Newham's growing population.

This section contains the following policies:

- **SI1: Existing community facilities and health care facilities**
- **SI2: New and re-provided community facilities and health care facilities**
- **SI3: Cultural facilities and sport and recreation facilities**
- **SI4: Education and childcare facilities**
- **SI5: Burial space and related facilities**



[19] The London Healthy Urban Development Unit (HUDU) helps the NHS engage and respond proactively to population growth and change in London and to maximise the opportunities that aligning the health and planning agendas can bring to improve health and narrow health inequalities. For more information see here: https://www.healthyurbandevelopment.nhs.uk/about-us/

Policy SI1: Existing community facilities and health facilities

1. Existing facilities will be protected and should not be lost to other uses, 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 an assessment that the existing use is surplus to current and future needs and:
        i. evidence that the facility has been actively marketed for community or health 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
        ii. 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, the preferred type of development will be that which delivers the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location).



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Justification

3.125 The loss of social infrastructure can have a damaging effect on the health and wellbeing of a community. This policy seeks to protect existing community facilities and health facilities, especially those in areas with a deficit of provision.

3.126 There is an uneven distribution of community facilities across the borough. Newham's Community Facilities Needs Assessment (2022) has established that a number of the largest site allocations in the south of the borough are within areas that currently have few community facilities. The neighbourhood areas of Manor Road, Gallions Reach, Royal Albert North and Three Mills have the fewest community facilities with less than 5 facilities in each area. In contrast, Stratford and Maryland has the highest number of facilities with 67 followed by Plaistow with 50. The highest density of facilities can be found in Green Street (25 facilities per Km^2) followed by Plaistow and Stratford and Maryland (20 and 18.5 facilities Km^2 respectively).

3.127 Given this uneven distribution, the protection of existing, much needed, community facilities is of the upmost importance. Newham's wide range of community facilities are an essential element of its neighbourhoods, helping to support the needs of people living and working in the borough. In Newham 1 in 4 people report feeling lonely often and 23,400 people live alone[20]. Loneliness and social isolation is a serious public health concern, leading to higher rates of premature mortality comparable to those associated with smoking and alcohol consumption. We therefore want to protect those facilities which can help combat loneliness. Faith groups, community halls, youth zones, and other community facilities play an important role in creating stronger communities.

3.128 Newham's Community Wealth Building Strategy (2020) recognises the essential link between our resident's health and wealth in the community. The availability of, and access to, good quality health care has a direct positive effect on the health of Newham's communities. Within Newham there are currently 50 primary care assets and a total of 206 health assets which includes pharmacy, primary care, mental health and secondary care. The demand for health services in London is increasing due to a growing and ageing population and an increase in complex and long-term health conditions. As part of this demographic change, the NHS has set out the need to undertake a higher proportion of healthcare in community rather than hospital settings, aligning strongly to the Local Plan's approach of creating a network of well-connected neighbourhoods and 50 steps to a Healthier Newham Health and Wellbeing Strategy (2024).

3.129 The provision of accessible and sustainable health care services to support population growth and change is an essential component of creating sustainable, healthy neighbourhoods. The integration of some NHS and local authority services can improve the effectiveness and efficiency of service delivery. This is grounded the well-connected neighbourhood network approach which aims to create healthier and happier communities where people in Newham can access all the basic, day-to-day needs within a 15 minute walk or cycle from their home.



Image © Publica

[20] ONS 2022/21

Implementation

ALL	For the purpose of this policy, community facilities are defined as: • Community centre, meeting places (for the principal 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) 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) *Main town centre uses, as defined by the NPPF and London Plan (2021) Policy SI1 does not apply to education uses and childcare facilities, these uses are addressed in Policy SI4. The following parts of Policy SI1 apply to cultural facilities and sport and recreation facilities, as set out in Policy SI3: • Policy SI1 part 1.a • Policy SI1 part 1.c • Policy SI1 part 2

SI1.1	Applicants will need to be able to demonstrate that a 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. 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 2042). Facilities should meet the criteria set out in Local Plan Policy SI2 Part 6. 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. 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 15 minute social infrastructure network, within 15minutes 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.

SI1.1

For a facility to be considered available it should have capacity to accommodate users at the times they wish to use the space. For a 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.

SI1.1

  - 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 (NHS North East London Integrated Care Board (NHS NEL ICB), Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, the Healthy Urban Development Unit (HUDU), the Healthy Urban Development Unit (HUDU) and NHS Property Services Ltd). 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.
- the development proposal is for an alternative social infrastructure use, the benefits of which clearly outweigh the loss of the former or current use.
- recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.

SI1.1	Evidence that the facility has been actively marketed for social infrastructure use should include: • 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 • 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 • a record of all expressions of interest received with full reasons given as to why any offer was not accepted. • 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. • evidence that consideration has been made to alternative methods of ownership, for example community or voluntary operation. 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.

SI1.1	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: • Hospital trusts and other health organisations. • The emergency services (Metropolitan Police Service, London Fire Brigade, London Ambulance). • Public sector organisations, such as the Council, who maintain a portfolio of community premises. • Higher education institutions. A Social Value Health Impact Assessment is needed to support any application for a loss, reduction, replacement, or relocation of a facility.
SI1.2	Where it can be demonstrated that the loss of a community facility is acceptable, we will seek to see the delivery of development that will support the maximum viable amount of affordable housing (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.

Evidence base

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

Policy Links

Local Plan:

- SI2: New and re-provided community facilities and health facilities
- BFN3: Social Value And Health Impact Assessment - delivering social value, health and wellbeing
- HS1: Newham's Town Centres Network
- J1: Employment and growth
- H3: Affordable housing
- Section 4: Neighbourhoods

London Plan 2021:

- S1: Developing London's social infrastructure
- S2: Health and social care facilities



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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. 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. 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:
        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. 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.

5. Re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:
    a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and
    b. there are no unacceptable transport and highways impacts; and

c. it can be demonstrated that the scheme has been designed to be neighbourly; and
d. if a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no there are no significant adverse impacts.

6. Proposals for all new and re-provided (including modernisation and/or expansion) facilities should:
   a. provide a Social Value-Health Impact Assessment (see Local Plan Policy BFN3); and
   b. 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.

7. Proposals for social infrastructure facilities will usually be:
   a. secured for the specific intended use of the facility; and
   b. required to enter into a Community Use Agreement with the Council.



Planning Obligations

- Contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site.

Justification

3.130 Community facilities are shared resources within which experiences and social value are created. It is important that the growth in Newham's population is supported by appropriately located, designed and managed community facilities. New community facilities are required to meet the needs of future residents. Over the Local Plan period new social infrastructure will need to be delivered alongside housing in places such as Stratford, Beckton and the Royal Docks where growth is expected to be the most significant. This is particularly important in parts of the borough, such as Gallions Reach and the Royal Docks, where there is currently a deficit in community facilities.

3.131 New social infrastructure should seek to address gaps in provision, both existing and future. The requirement for neighbourhood and site-specific community facilities and health facilities are set out in the Local Plan Neighbourhoods and site allocations chapter.

3.132 Convenient access to community and health facilities is important, as it allows a range of people to easily use the services they need. This will often mean that new facilities will be directed to Newham's Town and Local Centres. This also has the benefit of drawing further footfall into our centres, improving their vitality. There may however be some flexibility on location, depending on the type and scale of the facility being provided. In all cases, facilities should be easily accessible by walking, cycling and public transport in accordance with the TfL Healthy Streets principles (see Local Plan Policy T2).

3.133 Facilities should be designed to integrate with the surrounding area and create places where people feel welcome. Newham's social infrastructure plays an important role in providing spaces where people from different backgrounds can meet, socialise and have shared experiences. It is important to plan, design and manage facilities to help aid social interaction.

3.134 When designing new and re-provided facilities it is important think about its users from the outset. Co-design is particularly important in areas undergoing significant levels of change. The design of facilities benefits from the involvement of operators, community groups, residents and workers.

3.135 Increasingly, complementary services which are managed by a variety of different providers are being brought together in the same site or building. The co-location of services can bring together unlikely activities, this can facilitate social interaction between people who may not otherwise have met. It can also help to realise savings and efficiencies.

3.136 The Infrastructure Delivery Plan (IDP) identifies infrastructure requirements across the borough, setting out what is needed, where, and when. It includes projects relevant to education, health, culture, sports and the emergency services. The IDP will form an important part of demonstrating the sufficiency of, or requirement for, social infrastructure across the Borough throughout the plan period due to the live nature of the document which will be updated annually to ensure it remains current.

Implementation

ALL	Policy SI2 does not apply to education uses and childcare facilities, these uses are addressed in Policy SI4. New and re-provided culture, sport and recreation facilities should meet the criteria set out in Local Plan Policy SI2.

SI2.1	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. 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): • Local Plan Neighbourhoods with facilities below the average Newham provision of 10.8 Facilities/Km^2, • Local Plan Neighbourhoods within Community Neighbourhoods with below the borough average provision per 1,000 head of population, • Local Plan Neighbourhoods within Community Neighbourhoods with the borough average provision per 1,000 head of population and where high growth is anticipated, • Local Plan Neighbourhoods within Community Neighbourhoods with above the borough average provision per 1,000 head of population and where high growth is anticipated.

SI2.1

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.

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 (NHS North East London Integrated Care Board (NHS NEL ICB), Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, the Healthy Urban Development Unit (HUDU) and NHS Property Services Ltd) 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 the facilities in the borough's network of well-connected neighbourhoods. 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.

SI2.1

This will demonstrate the level of relevant facility coverage around the site 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.



SI2.1	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 (NHS North East London Integrated Care Board (NHS NEL ICB), Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, the Healthy Urban Development Unit (HUDU) and NHS Property Services Ltd). 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.

SI2.1	Cultural, sport and recreation facilities • Please see Policy SI3 part 2. 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.
SI2.2	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. 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: • 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. • 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.

SI2.2	Applicants should provide a Transport Assessment to allow proper assessment of any transport impacts (see Local Plan Policy T3). Town centres and local centres are defined on Newham's policies map and are set out in Local Plan Policy HS1. A sequential test, proportional to the size and nature of the facility, must be submitted as part of any application for planning permission for the development of a facility 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. 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. 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. 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.

SI2.2	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. Where a main town centre sport or recreation use, or a bar of pub of more than 300 sqm 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. 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). 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. 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.

SI2.2	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.
SI2.3	Social infrastructure should be located in areas convenient for the communities it serves. This means that it may be acceptable for some smaller facilities and those with a local user base to be located outside of a designated Town or Local Centre. In these cases, the users of the facility should be able to easily access the facility by foot or sustainable transport methods. Applications outside of a town or local centre must demonstrate, though a Transport Statement (see Local Plan Policy T3), that there are no unacceptable transport or highways impacts. Development proposals for social infrastructure of a town or local centre are likely to come forward in more residential settings. Because of this, it is important to ensure there are no negative impacts on the neighbourhood, this can include impact on outlook, privacy, sunlight/ daylight and unacceptable disruption as a result of the development such as increased parking, smells, fumes or noise disturbance. Newham's Neighbourhood Parades are set out on the Local Plan Policies Map and further detail is provided in Local Plan Policy HS1. For the purposes of this policy a park is defined as being a green space which is a minimum size of 2 hectares (as set out in Table 8.1 of the London Plan 2021). For guidance on undertaking a sequential and/or impact test please see the implementation text for Local Plan Policy SI2.2.

SI2.4	For the purposes of this policy, re-provision can range from a simple minor extension to extensive modernisation, expansion or total rebuild of a community facility. Re-provision of a facility in a town or local centre will need to provide a Transport Assessment to allow proper assessment of any transport impacts (see Local Plan Policy T3). It is important to ensure there are no negative impacts on the neighbourhood, this can include impact on outlook, privacy, sunlight/ daylight and unacceptable disruption as a result of the development such as increased parking, smells, fumes or noise disturbance (see Local Plan Policy D7). Where a development proposes a main town centre sport or recreation use of more than 300 sqm Gross Internal Area, either through extension or new provision, outside of or on the edge of a defined centre, an impact assessment will be required (see implementation text SI2.1 for further guidance).
SI2.5	For the purposes of this policy, re-provision can range from a simple minor extension to extensive modernisation, expansion or total rebuild of a facility. Whilst the presence of an existing facility, which is operating from a location outside of a town or local centre could be deemed acceptable, it is important to ensure that the proposed development will not impact negatively on the neighbourhood. This is especially important where a facility has been vacant and unused for some time. When considering neighbourliness and the suitability of the existing location, consideration will be given to any existing complaints regarding highways impacts or noise.

SI2.5 Out of centre facilities will be required to demonstrate, through a Transport Assessment/Statement (see Local Plan Policy T3), that the proposed development will not generate additional trips, draw from a wider catchment (users and staff) or disturb those living nearby.

It is important to ensure there are no negative impacts on the neighbourhood, this can include impact on outlook, privacy, sunlight/daylight and unacceptable disruption as a result of the development such as increased parking, smells, fumes or noise disturbance.

SI2.6 New and re-provided facilities should provide a Social Value Health Impact Assessment (see Policy BFN3). The scope of the assessment will be agreed with the Council at the earliest possible stage of the planning process.

The following will be required as a minimum:

- engagement with all the relevant bodies/organisations involved in provision of services.
- evidence to demonstrate who uses/or is expected to use the facility and former users (where the facility has declined or closed), including description with regard to, but not limited to, protected characteristics.
- evidence of consultation with existing/former/future users of the facility.

Applicants are encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the intended operator and the local community. This ensures that local people can meaningfully input into a scheme's development. The co-design of community facilities is especially important. Applicants should focus on engaging young people and a range of residents as diverse as the local population across all protected characteristics, and provide details of how they will be engaged.

SI2.7 The approach to co-design should be underpinned by the engagement principles contained within Newham's Statement of Community Involvement, be fully accessible, and include offline and online activities, the use of existing local events, innovative and fun activities and allow for long term engagement.

The design of community facilities, both spaces and services, can facilitate different forms of social integration. The Greater London Authority's Connective Social Infrastructure (2020) document is helpful resource, setting out design considerations to think about when delivering community facilities. The layout, types of facilities provided (for example community kitchens and food storage spaces) and storage was a common issue raise by those consulted for Newham's Community Facilities Needs Assessment (2022). Social infrastructure can also help to facilitate a Circular Economy in the ways they provide for goods and materials to be re-used, repaired and refurbished.

Examples include the following services which could be provided:

- repair/refurbishment workshops;
- other uses associated with repair of products e.g. tailors;
- shops selling second hand goods;
- lending libraries (e.g. 'Library of things');
- hire shops; and
- 'reuse hubs'.

Use Our School is a free online Sport England resource that offers further guidance and information on how to make best use of facilities for the benefit of the local community. It is especially useful for those who have responsibility for establishing, sustaining and growing community activity on school sites but is applicable to other types of community facility.

SI2.6	Examples of how facilities can be designed to be inclusive include: tactile surfaces, hearing loops, good signage and lighting, additional seating. Local Plan Policy D1 further sets out the requirements to ensure community facilities are well designed and create well integrated developments which connect into and appear part of their wider natural and built surroundings. Please see Local Plan Policy T3 to understand further the requirements for how community facilities should be accessible and support access by sustainable modes of transport. This includes guidance on provision of cycle parking and storage. There is a need for public toilets. A lack of provision can mean people are less able to go out into the community. Large-scale developments with large numbers of visitors should provide public toilets for a range of users including disabled people, families with young children and people of all gender identities. Where appropriate, facilities should incorporate public toilets which make provision for those people with learning and physical disabilities and their carers. These free 'Changing Places' toilets should be designed in accordance with the guidance in British Standard BS 8300-2:2018. The following facilities are considered especially appropriate for this provision: • Sport and recreation facilities • Cultural centres, such as museums, concert halls and art galleries • Town halls, civic centres and public libraries • Education establishments • Health facilities, such as hospitals, health centres and community practices

SI2.6	Public Toilets and 'Changing Places' should be available during opening hours, or 24 hours a day were access from areas of public realm. Clear signage should be provided so people are aware there are public toilets – both outside and inside the building. Toilet facilities should be open to anyone regardless of whether or not they are using the facility.
SI2.7	Social infrastructure permitted outside a town centre will usually be secured to ensure that the facility continues to serve a local function, does not lead to unintended character change and continues to meet the needs of its users. We will seek opportunities to improve access to facilities through a Community Use Agreement to allow the shared use of a facility by the wider community or increased hours of community access. The Community Use Agreement will also seek to enter an agreement on the ongoing revenue costs of the facility. Applicants will be expected to demonstrate how the successful long-term future of the facility will be secured.

Evidence base

- Building Newham's Creative Future, Publica (2022)
- Community Facilities Needs Assessment, Publica (2022)
- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Retail and Leisure Study, Urban Shape (2022)
- 50 Steps Health and Wellbeing Strategy, Newham (2024)
- 50 Steps Evidence base, Newham (2020)
- The Decline of the Great British Public Toilet, The Royal Society for Public Health (2019)

Policy Links

Local Plan:

- BFN3: Social Value and Health Impact Assessment - Delivering social value, health and wellbeing
- D7: Neighbourliness
- HS1: Newham's Town Centres Network
- HS2: Managing new and existing Town and Local Centres
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services
- J1: Employment and growth
- BF1: Spatial strategy
- T3: Transport behaviour change
- Section 4: Neighbourhoods

London Plan 2021:

- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S5 Sports and recreation facilities
- S6 Public toilets
- SD7 Town Centres: development principles and Development Plan Documents
- HC5 Supporting London's culture and creative industries
- HC7 Protecting public houses



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, 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 are met; or
    b. the existing and any other social infrastructure use is no longer required, as demonstrated by an assessment that the existing use is surplus to current and future needs and:
        i. 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
        ii. 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.

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 culture, sport and recreation facilities should meet the criteria set out in Local Plan Policy SI2.



Justification

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

3.138 Over the past 15 years Newham has been at the centre of some of London and the UK's largest and most ambitious cultural regeneration projects, with key developments at East Bank. Newham is home to a thriving and talented community of artists, dance groups, production agencies, musicians, community choirs, theatre companies and fashion designers. This community is essential in showcasing and nurturing Newham's cultural diversity and heritage. Artists contribute to vibrancy and the identity of a place and can encourage wider social value through open studios, public performances/exhibitions, events and festivals. Cultural facilities provide the spaces for art and culture, in all its forms, to be experienced and valued. Newham currently has few cultural spaces across its neighbourhoods[21], with many not having any access to facilities such as music or dance venues, galleries or local museums.

3.139 Sports and recreation facilities are vital for promoting people's health and well-being, helping people to be active and de-stress. Priority 8 of Newham's Health and Wellbeing Strategy seeks to create an active borough.

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

3.140 Despite a substantial free activity offer and some improvements to our sporting infrastructure in recent years, participation in sport and recreation activities in Newham remain among the lowest in England[22].

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

3.142 We need to ensure that residents continue to have opportunities to be physically active and healthy. On average, Newham residents have poorer health outcomes than London and England. For example, life expectancy is shorter[23], early death from cardiovascular disease is higher[24], there is more mental health illness[25], and children are more likely to be overweight or obese[26]. Evidence suggests a link between the inactivity of residents and levels of local deprivation with the highest areas of deprivation almost 10 per cent more physically inactive than lowest deprivation areas[27]. In addition, the perception that there is a lack of safe, green spaces as well as an ageing portfolio of sport and recreation facilities around the borough, contribute to low participation in physical activity. This creates a tipping point for poor health outcomes such as obesity and can affect mental wellbeing.

Implementation

ALL	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 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)) * Main town centre uses, as defined by the NPPF and London Plan (2021)
ALL	In addition to Policy SI3, new and re-provided culture, sport and recreation facilities should meet the criteria set out in: • Policy SI1 part 1.a • Policy SI1 part 1.c • Policy SI1 part 2 • Policy SI2
SI3.1	Newham will look to protect existing cultural and sport and recreation facilities. Applicants wishing to bring forward a development which will impact an existing cultural facility should first consult Newham's Community Facilities Needs Assessment (2022), We Are Cultural (2022) and the Built Leisure Needs Assessment (2025) to understand existing provision in the borough and if the proposal site falls in an area of deficit. 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 reduction in size or relocation).

[22] Well Newham, 50 Steps to a Healthier Borough. Part 2: The Evidence for Action (2020). [23] Public Health Outcomes Framework - Data - OHID (phe.org.uk) [24] Public Health Outcomes Framework - Data - OHID (phe.org.uk) [25] Adult Psychiatric Morbidity Survey [26] Public Health Outcomes Framework - Data - OHID (phe.org.uk) [27] Active, U. K. (2014). Turning the tide of inactivity. London: UK Active. England, S. (2017). Active lives adult survey: May 18/19 report. London: Sport England.

SI3.1	There are a number of additional tools in place to help quantify any demand from future users created by the building of new homes and population growth for sport and recreation facilities (Built Leisure Needs Assessment (2025) and Sports Facility Calculator (Sport England). Sport England's Planning for Sport Guidance (2019), and subsequent updates, provides a useful guide to what understanding the need for sport and recreation facilities. Implementation text for Policy SI1.1 provides guidance on providing a Social-Value-Health Impact Assessment.
SI3.2	The Local Plan neighbourhood policies and relevant site allocations set out where future sport and recreation facilities are required, reflecting the need set out in the Built Leisure Needs Assessment (2025). Where the need for a sport and recreation 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. 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: • 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 the 15 minute network of all cultural facility/sport or recreation facility locations (including town centres).

SI3.2	Each facility location should have its 15 minute walking radius mapped (using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users). The mapping should show the network with and without the facility site. This will demonstrate the level of relevant facility coverage around the site and if the loss of a facility in this location would create a deficiency in the network, factoring in any pedestrian barriers and access challenges in the urban context. • applicants should consult Newham's Built Leisure Needs Assessment (2025) to ascertain the current provision of sport and recreation facilities in the borough and whether or not the site is in an area of deficit. A proposals neighbourhood will depend on the type of service it is offering. • recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. 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.

	Sport and recreation facilities • 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. 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.
SI3.3	Applications for new and re-provided cultural and sport and recreation facilities will be supported, subject to meeting the criteria of Local Plan Policy SI2. Applicants wishing to bring forward a new or re-provided cultural facility should first consult Newham's Community Facilities Needs Assessment (2022) and Newham's Culture Strategy, We Are Cultural (2022). Applicants wishing to bring forward a new or re-provided sport or recreation facility should first consult the Built Leisure Needs Assessment (2025) to understand existing provision in the borough. Large-scale cultural and sport and recreation facilities will be required to support access to Newham's emerging Culture Passport. The co-location of sports facilities is encouraged, particularly within new and existing schools, colleges main town centre uses. This will help ensure the right mix of facilities in the right places to meet sporting demand and to increase participation. The implementation text for Local Plan Policy SI2 provides guidance on the development of new or re-provided cultural and sport and recreation facilities. Local Plan Policy BFN3 provides guidance on undertaking a Social Value-Health Impact Assessment.

Evidence base

- Building Newham's Creative Future, Publica (2022)
- Community Facilities Needs Assessment, Publica (2022)
- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Built Leisure Facilities Needs Assessment, Strategic Leisure (2025)
- Retail and Leisure Study, Urban Shape (2022)
- 50 Steps Health and Wellbeing Strategy, Newham (2024)
- 50 Steps Evidence base, Newham (2020)

Policy Links

Local Plan:

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

London Plan 2021:

- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S5 Sports and recreation facilities
- SD7 Town Centres: development principles and Development Plan Documents
- HC5 Supporting London's culture and creative industries
- HC7 Protecting public houses

Policy SI4: Education and childcare facilities

1. A sufficient supply of childcare facilities, primary schools, secondary schools, and Special Educational Needs and Disabilities (SEND) schools to meet local need, will be achieved through:
    a. the delivery of new schools and childcare facilities on identified site allocations, of the scale required to meet the projected need for school places;
    b. the support for expansions of existing facilities in areas with identified need to deliver further childcare, primary, secondary and Special Education Needs and Disabilities (SEND)provision; and
    c. the provision of new, expanded and improved education and childcare facilities, where it is demonstrated that there is unmet demand which will not be met by any planned delivery.

2. New higher education facilities will be directed to, and supported in, Newham's designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus site.

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

4. The net loss of education facilities will only be permitted if it is demonstrated that there is no identified long-term need for the facility at that location.

5. To support the delivery of a network of well-connected neighbourhoods, new school facilities should:
    a. be easily accessible via public transport and active travel and links to the existing network of footpath and cycle routes;
    b. reduce the harm caused by poor air quality through the favourable location of the building(s) and associated outdoor space away from busy roads or other high pollution areas. Where this is not possible, it must be demonstrated, to the Council's satisfaction, that the provision of appropriate mitigation (such as careful layout and choice of soft landscaping) to minimise exposure to pollutants and careful layout and choice of soft landscaping;
    c. be located on streets that can allow for temporary restrictions on motorised traffic in order to reduce exposure to air pollution and ensure pupil safety;
    d. be located in areas linked to the existing network of footpath and cycle routes; and
    e. submit a Transport Assessment (see Local Plan Policy T3).

6. To guarantee high-quality learning environments, new, expanded or reconfigured education facilities should:
    a. have access to outdoor greenspaces and play spaces and be ideally located within a 15 minute walking radius of a park; and
    b. maximise biodiversity on site, including trees, gardens, and food growing spaces.

7. The design of new education facilities as well as extensions to, or reconfigurations of, existing facilities should ensure a high quality learning environment to ensure they are inclusive and accessible to all (including SEND students and those with reduced mobility needs), This will be achieved through:
    a. meeting the relevant code of practice; and
    b. undertaking co-production with pupils with Special Educational Needs and Disabilities, parents and teachers, especially when proposing unconventional design approaches.

8. Schools and higher education facilities should be designed and managed to meet a variety of community uses by:
    a. providing access for community uses outside of core hours;
    b. ensuring that the design of new education facilities is flexible in order to allow for a variety of uses within them.

9. New, expanded or reconfigured higher education facilities should deliver sufficient provision of independent learning and sport and recreation facilities to meet the needs of students and where feasible the community.

10. New tuition centres, training centres, specialist training colleges, adult learning facilities, further education facilities, and higher educational facilities will be required to provide information of the relevant certification and registration details from the Department for Education.



Planning Obligations

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

Justification

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

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

3.145 Nonetheless, there is likely to be an increase in demand for all school and childcare facilities over the Plan period, as forecasts indicate that by 2032, the population of 0 to 25 years will grow by 11 per cent (Places for All, London Borough of Newham (2022)). This suggests additional places will need to be delivered in line with new housing developments in some areas of the borough to accommodate future demand, which is why some Local Plan site allocations are required to deliver education facilities and why expansions on sites in areas with identified need are encouraged.

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

Implementation

ALL	Education and childcare facilities are required to comply with Local Plan Policy SI4 and are not subject to Policies SI1, SI2 or SI3.
SI4.1	The planned delivery of childcare facilities, primary schools, secondary schools, and Special Education Needs and Disability (SEND) schools on site allocations is based on the findings from the pupil forecast (Places for All, London Borough of Newham (2022), together with the Childcare Sufficiency Assessment (London Borough of Newham (2021). These forecasts identify where childcare facilities, primary schools, secondary schools, and SEND schools are needed based on increased levels of population resulting from residential developments and socio-economic trends. In accordance with the Childcare Act (2006; 2016), all new primary school developments are expected to include childcare facilities, including full-time and part-time spaces. The provision of childcare facilities for ages 0-5 should be demonstrated in the proposed design of the site.

SI4.1

Table 6: Site allocations that address Newham's future education and childcare needs

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
N5.SA4 Royal Road, N5 Custom House	Custom House	Canning Town and Custom House	SEND 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
N13.SA1 East Ham Western Gateway, N13 East Ham	East Ham	East Ham	Early years child care facility

SI4.1	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 part 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 Newham's Education Places for All Strategy.
SI4.2	Development which will enhance higher education and skills provision in Newham will be supported either on existing campus developments within the borough or in town centre locations. Applicants will need to provide evidence of having secured the higher education establishment that will be using the proposed facility, as well as details of student and staff numbers, enrolment criteria, and curriculum details. Local Plan Policy H8 sets out the requirement for applications for purpose built student accommodation.
SI4.3	Newham's Education Places for All Strategy and the annual Childcare Sufficiency Assessment (London Borough of Newham will likely reflect changing levels of demand for early years and school places as they are revised over the Plan period. As such, the delivery of new educational facilities should be flexible in terms of both timescale and design to respond effectively to fluctuating pupil place needs. 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 overprovision. 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. Where the school is expected to come forward in the latter part of the Plan period, suitable meanwhile uses should be identified for the site. These uses should be set out in the schemes Meanwhile Use Strategy and must be consistent with Policy with BFN1. In terms of design, new proposals for educational facilities should have regard to the design standards of the Area Guidelines for Mainstream Schools (Department for Education (2014)) and Active Design (Sport England ((2015)), 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.

SI4.3	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 Policy SI4 parts 6 and 7.
SI4.4	Forecasts demonstrate that the young population of Newham will grow throughout the Plan period (Places for All, London Borough of Newham (2022) and Childcare Sufficiency Assessment, London Borough of Newham (2021)). As such, all childcare and educational facilities should be protected unless the revised Pupil Place Planning Report, or equivalent corporate strategy, suggests there is no long-term need for such facility.
SI4.5	Education facilities 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. Additionally, facilities should reduce exposure to air pollution and improve safety by not being located close to pollution sources, such as beside roads or in areas where vehicles idle. Air quality should be considered at the earliest stages of planning and design, before the position of infrastructure and buildings is decided. A site-specific air quality appraisal should form part of any application that includes an education or childcare facility. Understanding the air quality constraints of a site as early as possible can benefit the design of a development. The GLA guidance, Using Green Infrastructure to Protect People from Air Pollution (2019), provides best practice on how green infrastructure can reduce exposure to air pollution in an urban environment. Consultation with Newham's Environmental Health Officers is essential.

SI4.5	All of the above requirements should 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)). It should clearly demonstrate how the proposal will support active travel and mitigate transport impacts, including measures to address potential congestion, on surrounding roads – particularly where the site is located within or adjacent to a residential area. See Local Plan Policy T3 for further travel plan guidance.
SI4.6	In addition to following building regulations for childcare, schools, and further education facilities as per BB103 Area Guidelines for Mainstream Schools (Department for Education (2014)), new educational facilities should be designed to deliver the following requirements: • layout: new education facilities should provide outdoor greenspace at ground-floor level (including play spaces, allotments, gardens, trees, sheltered outdoor spaces, and food growing spaces) in line with Sport England's Design and cost guidance. • facilities need to be sufficiently large to accommodate the maximum number of pupils. • facilities should also ideally be located within a 15 minute walking radius of an existing green space (2ha or more). Green space in proximity to an education facility should not replace the requirement for greenspace on-site.
SI4.7	All new educational facilities, together with extensions to existing educational facilities, should comply with the design standards of Special Educational Needs and Disability Code of Practice: 0 to 25 Years (Department for Education and Department of Health (2015)) to make sure that educational facilities are fully inclusive and adapted to meet all student needs.

SI4.7	Applications should demonstrate the implementation of Special Educational Needs and Disabilities related design standards, and should also demonstrate evidence of co-production with parents, pupils, and teachers, to reach design decisions. This is particularly essential for unconventional and innovative design approaches. All educational facilities should still follow the relevant building guidance, but variation in design will be supported when required by site constraints and the final design still creates a high quality learning environment and meets the requirements of Newham's Education team. Variations to the design of SEND schools are less likely to be supported, due to the specific needs of their pupils.
SI4.8	New education facilities need to provide access for community uses outside of core hours, which include before and after school hours weekends and school holidays. Education facilities should seek to enable as much of the school as feasible to be made available for local community groups and the council. This includes all spaces within educational facilities, including classrooms, halls, gyms, outdoor spaces, and canteens. Where aspects of the facility is excluded from community use, evidence must be provided as to why this is not feasible. All design considerations must be explored to seek to maximise wider community use. In order to guarantee access to the community, a Community Use Agreement will be secured that will prioritise community uses at affordable rates. Community Use Agreements are likely to include, but are not restricted to: • hours of operation, • rent thresholds, • management of the space, • what uses it can allow, • how it will be advertised.

SI4.8	The layout of new education facilities should be sufficiently flexible to adapt to different community uses. The flexibility of the proposed space should be demonstrated in the Design and Access Statement. 'Use Our School' is a free online Sport England resource that offers further guidance and information on how to make best use of facilities for the benefit of the local community. It is especially useful for those who have responsibility for establishing, sustaining and growing community activity on school sites.
SI4.9	Higher education providers need to deliver sufficient access to necessary student facilities to ensure that the student body does not overburden limited spaces in public facilities. Sufficient provision of independent learning and sport and recreation facilities should meet the needs of the maximum number of potential future students. Student facilities include studying spaces, sports, culture and sport and recreation facilities and classrooms. The design of higher education facilities should follow the requirements in SI4.5, SI4.6, and SI4.7, and the flexibility to allow for future expansion and protection of the facility should follow the requirements in clauses SI4.2 and SI4.4.
SI4.10	Tuition centres, training centres, adult, and further and higher educational facilities provide additional and lifelong learning and there is need for such uses for residents of all ages to gain more skills and qualifications. Applicants will need to provide evidence of the relevant Ofsted registration from the Department for Education as well as details of student and staff numbers, enrolment criteria, and curriculum details.

Evidence base links

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

Policy Links

Local Plan:

- GWS1: Green spaces
- GWS2: Water spaces
- GWS5: Play and informal recreation for all ages
- CE1: Environmental design and delivery
- T3: Transport behaviour change
- H8: Purpose built student accommodation
- Section 4: Neighbourhoods

London Plan 2021:

- S3 Education and childcare facilities



Policy SI5: Burial space and related facilities

1. Existing in-use cemeteries and crematoria will be protected to meet Newham's future burial needs. Proposals which result in increased provision of burial space, including for those parts of the community for whom burial is the only option, will be supported.

2. Developments that propose the delivery of new burial space and related facilities will be supported where they:
    a. meet the needs and requirements of Newham's population, including for those parts of the community for whom burial is the only option;
    b. will not cause unacceptable amenity or highways impacts;
    c. adequately address environmental risks, including flood risk and land and water contamination;
    d. deliver any ancillary buildings at an appropriate scale and sensitive design; and
    e. are publicly accessible, with well-maintained and biodiverse landscaping.

Justification

3.147 Local Authorities have no statutory duty to provide burial spaces, however we recognise the importance of suitable and local spaces to ensure dignity in death and for the bereaved. Newham contains a large number of in-use and historic cemeteries: West Ham Cemetery, the City of London Cemetery and Crematorium, the East London Cemetery and Crematorium, Woodgrange Park Cemetery and three Jewish cemeteries. All but the three Jewish cemeteries remain available for new burial plots, however available space is reducing and predominantly consists of the reuse of graves.

3.148 The latest available information regarding Newham and London's burial space provision is the 2011 Audit of London Burial Provision, undertaken by the GLA. This indicated that due to the number of existing cemeteries in Newham and re-use of graves that provision of burial space in Newham is sustainable.

3.149 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham's diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. As such we support the provision of additional burial space, in particular to meet the needs of Newham's communities which cannot be met within the existing provision.

Newham Burial Space Study (2024) provides a local understanding of Newham's burial space needs. This study provides an audit of the borough's existing burial space provision and will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.

Implementation

SI5.1	All cemeteries and burial spaces are protected as green space, under Local Plan policy GWS1. In addition to this protection, this policy protects their ongoing use as spaces for burial. The redesign of existing sites, for example through changing landscaping and use of parts of the sites not previously used for burials can help provide new burial plots, including those that meet the need for previously un-used land.
SI5.2	Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham's communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham Burial Space Study (2024) and any relevant future local and/or regional burial space evidence base.

SI5.2	The co-design of burial space facilities ensures that local people can meaningfully input into a scheme's development. Applicants are therefore encouraged to engage early in the development process with ward members, the Council's Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. New burial spaces should be suitably located and designed to minimise and mitigate any impact on neighbouring uses. Sites should be accessible to residents, in particular by public transport. Applicants must submit a Transport Assessment and Travel Plan in line with Local Plan policy T3. Early engagement with the Environment Agency is encouraged to ensure that all environmental risks have been identified and suitably mitigated. Further information on flood risk, Groundwater source protection zones, groundwater levels and contaminated land can be found in the Strategic Flood Risk Assessment 2025, the Environment Agency Magic Map and the Newham Contaminated Land Strategy 2024. Ancillary buildings should be designed to provide suitable facilities for a range of funeral practices, while complementing the character and appearance of the green space. Any such building provided within the Green Belt or on Metropolitan Open Land must preserve its openness and not conflict with the purposes of including land within it. All new burial spaces will be expected to optimise opportunities for biodiversity and appropriate public access. A Management Plan, which demonstrates how the applicable requirements of the Public London Charter principles and all applicable principles set out in Local Plan policy GWS1 will be met, must be provided.

SI5.2	A Maintenance and Management Strategy will be secured to ensure the long-term and suitable maintenance and management of the site and its infrastructure.

Evidence base

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

Policy Links

Local Plan:

- GWS1: Green spaces
- CE1: Environmental design and delivery
- CE7: Managing flood risk
- T3: Transport Change

London Plan 2021:

- S7 Burial space

INCLUSIVE ECONOMY

3.150 The focus of Newham's economic future is Community Wealth Building. This means building a fair economy that secures social, economic and environmental benefits for all. The approach delivers growth that meets strategic and local economic needs while tackling key economic challenges faced by residents and businesses. The policies in this chapter seek to create new jobs and deliver new employment floorspace to support key growth sectors including those in clean industries, light manufacturing, green technology, digital, cultural and creative industries, transport and utilities, and warehousing and logistics. This will maximise the economic potential of land and economic development in Newham whilst securing higher quality employment opportunities for residents.

3.151 Newham is a strategically important economic location in London and has an important employment land resource. The policies in this chapter direct growth, across the borough, to areas which have the greatest economic potential. These include Strategic Industrial Locations (SILs) in Stratford, Canning Town, Royal Docks and Beckton, in close proximity to the Central Activity Zone (CAZ) which are all critical to support the increasing demands for industrial, warehousing and logistics (including 'last mile' delivery), production, manufacturing and utilities and transport infrastructure. Stratford, which has experienced significant growth since the Olympics, is emerging as a central hub for investment in the major office market, culture and leisure economies. The Royal Docks benefits from Enterprise Zone status and is an Opportunity Area. The Royal Docks area has significant potential for employment growth, principally to attract firms and jobs beyond the Newham market, including workspace clusters for Small and Medium Enterprises (SMEs) type businesses.

3.152 Newham's network of local employment locations and town centres are home to micro businesses (i.e. enterprises with less than 10 employees) and SMEs (i.e. enterprises with less than 250 employees) including start-ups, incubators or accelerators which all support Newham's diverse local economy. These locations are all critical to maximising the borough's economic potential as well as supporting the delivery of a network of well-connected neighbourhoods by improving access to economic opportunities, local supply chains and reducing the need to travel further afield to places of work.

3.153 In response to Newham's declaration of the climate emergency, building a greener economy is one of the Local Plan objectives and is a key element of our economic strategy. This means employment-led developments must address the environmental impacts from economic growth, support existing and emerging sectors in cleaner and greener industries and deliver improved designs to support energy efficient workspaces across the borough. Cumulatively, these actions will contribute to a greener future for Newham.

This section contains the following policies:

- **J1: Employment and growth**
- **J2: New employment floorspace**
- **J3: Protecting employment floorspace**
- **J4: Delivering Community Wealth Building and Inclusive Growth**



Policy J1: Employment and growth

1. Developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough's office and industrial needs to deliver 12,800 jobs (6,400 in the office sector and 6,400 in industrial/warehousing and logistics sectors); 418,000 sqm of industrial floorspace and a minimum of 118,000 sqm of office floorspace between 2021 and 2042.

2. New employment floorspace should be directed to, and delivered in accordance with the following spatial strategy and functional requirements and the design and delivery principles outlined in Local Plan Policy J2:

    a. The development of industrial floorspace for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) uses (including waste, utilities including digital/data and transport depots) should be located in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs). Uses identified in Tables 7 and 8 should be prioritised in each location.

Table 7: Strategic Industrial Locations (SILs)

Strategic Industrial Locations (SILs)		
Designation	**Priority Uses**	**Functional requirements**
SIL.1: London Industrial Park	Large scale industrial with a focus on: • warehousing and logistics (third party logistics and quick commerce); and • Large industrial food and drink production/ manufacturing; and • clean, green and low carbon industries.	i. No residential floorspace is permitted in these designations. ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of the industrial floorspace and of an appropriate scale.
SIL.2: British Gas/ Cody Road	Large scale industrial with a focus on: • warehousing and logistics (third party logistics, last mile, quick commerce and recycling); and • clean, green and low carbon industries; and • digital and high technology.	
SIL.3: Thameside West	Large scale industrial and small scale light industrial, suitable for: • clean, green and low carbon industries; and • wharf related uses (on Peruvian and Royal Primrose wharves); and • cultural and creative production; and • digital and high technology industries.	
SIL.4: Thameside East	Large scale industrial and small scale light industrial, suitable for: • manufacturing; and • cultural and creative production; and • clean, green and low carbon industries; and • Wharf related uses (on Thames Refinery wharf); and • digital and high technology industries.	

Table 7: Strategic Industrial Locations (SILs)

Strategic Industrial Locations (SILs)		
Designation	**Priority Uses**	**Design and Delivery Principles**
SIL.5: Beckton Riverside	Large scale industrial with a focus on • warehousing and logistics (third party logistics, last mile and quick commerce); and • utilities infrastructure; and • transport depot; and • Clean, green and low carbon industries.	i. No residential floorspace is permitted in these designations. ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of the industrial floorspace and of an appropriate scale.
SIL.6: Bow Goods Yard	• Safeguarded rail heads. • Large scale industrial, freight distribution. • Small scale light industrial uses.	

Table 8: Local Industrial Locations (LILs)

Local Industrial Locations (LILs)		
Designation	**Priority Uses**	**Design and Delivery Principles**
LIL1: Stephenson Street	• Transport infrastructure, large scale industrial and warehousing.	i. No residential floorspace is permitted in these designations. ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of industrial floorspace and of an appropriate scale. iii. New training floorspace (F1) will be accepted on Land East of London City Airport (LIL5) only where it is ancillary to the function of London City Airport and of an appropriate scale.
LIL2: Jubilee Line Depot	• Transport infrastructure and storage and ancillary training/offices. • Industrial uses particularly to service the Central Activities Zone (CAZ).	
LIL3: East Ham Depot	• Transport infrastructure function as a rail depot. • Large scale industrial.	
LIL4: Rick Roberts Way North	• General industrial, warehousing and office units with dedicated yard space. • Blue-chip occupiers and other industrial occupiers servicing the CAZ.	
LIL5: Land East of London City Arport	• Transport, freight distribution/ logistics uses.	
LIL6: Folkestone Road Depot	• Council depot functions. • Large scale industrial, particularly warehousing.	

Table 8: Local Industrial Locations (LILs)

Local Industrial Locations (LILs)		
Designation	**Priority Uses**	**Design and Delivery Principles**
LIL7: Beckton Gateway	• Large scale warehousing/ distribution, particularly for third party logistics occupiers.	i. No residential floorspace is permitted in these designations. ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of industrial floorspace and of an appropriate scale. iii. New training floorspace (F1) will be accepted on Land East of London City Airport (LIL5) only where it is ancillary to the function of London City Airport and of an appropriate scale.
LIL8: Canning Road East	• General industrial, food production/ manufacturing, local supply chain and storage.	
LIL9: Nursery Lane	• Large industrial food production/ manufacturing. • Light industrial and manufacturing units	
LIL10: Grantham Road	• Small to medium scale warehousing units.	
LIL11: St Mark's Industrial Estate	• Storage and Small and Medium Enterprises, light and general industrial units. • Flexible industrial units.	
LIL12: Albert Island	• Large scale industrial and warehousing uses. • Marine engineering (and boat yard), high technology and construction training.	

Table 8: Local Industrial Locations (LILs)

Local Industrial Locations (LILs)		
Designation	**Priority Uses**	**Design and Delivery Principles**
LIL13: Butchers Road	• Business park with light industrial uses with yardspace. • Storage and distribution, manufacturing and cultural and creative production.	i. No residential floorspace is permitted in these designations. ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of industrial floorspace and of an appropriate scale. iii. New training floorspace (F1) will be accepted on Land East of London City Airport (LIL5) only where it is ancillary to the function of London City Airport and of an appropriate scale.
LIL14: St Mary's Industrial Estate	• Low density light industrial uses. • Cultural and creative production.	
LIL15: Bridge Road Depot	• Council depot functions. • Light industrial units, maintenance, warehousing and storage for business support.	
LIL16: Kudhail Industrial Estate	• Light industrial uses, light manufacturing, small-scale storage and distribution (wholesale) and workspaces.	

b. In addition to the locations identified above, the development of industrial uses for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) uses (including waste, utilities including digital/ data and transport depots) may be located on retail and leisure parks with good accessibility to the Strategic Road Network.

c. The development of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)) and storage or distribution (B8) (including dark kitchen/shop, micro fulfilment)) uses will be supported in Local Mixed Use Areas (LMUA) as part of employment-led development. Uses identified in Table 9 should be prioritised in each location.



Table 9: Local Mixed Use Areas (LMUAs)

Local Mixed Use Areas (LMUAs)		
Designation	**Priority Uses**	**Functional requirements**
LMUA1: Silvertown Arches	• Flexible light industrial workspaces. • Civic functions (City Hall), cultural and creative production, green technology, digital and high technology industries and SMEs.	i. No residential floorspace is permitted.
LMUA2: Aldersbrook	• Light industrial workspaces and storage uses. • Light manufacturing, production and training.	i. Employment-led co-location with residential development is supported.
LMUA3: Nursery Lane	• Light industrial workspaces and small-scale offices workspaces. • Cultural and creative production.	
LMUA4: East Ham Industrial Estate	• Flexible workspaces for SMEs. • Light industrial workspaces.	
LMUA5: Forest Gate Arches	• Light industrial units and business workspaces. • Cultural and creative production, and SMEs and start-ups.	i. No residential floorspace is permitted.
LMUA6: Ashburton Terrace	• Light industrial, storage and distribution, small-scale office. • Local supply chains (requiring yard space) and workspaces for SMEs and start-ups.	i. Employment-led co-location with residential development is supported.
LMUA7: Dulcia Mills	• SMEs and light industrial, storage and distribution. • Uses to service local supply chains and local distribution.	

Table 9: Local Mixed Use Areas (LMUAs)

Local Mixed Use Areas (LMUAs)		
Designation	**Priority Uses**	**Design and Delivery Principles**
LMUA 8: Cook's Road	• Warehousing and logistics, and light industrial (consented). • Flexible workspaces, light manufacturing, cultural and creative production and distribution.	i. Employment-led co-location with residential development is supported.
LMUA9: Canning Road West	• Light industrial, small-scale office and flexible workspaces. • SMEs, manufacturing and production.	
LMUA10: Grove Crescent	• Light industrial and flexible business workspaces. • SMEs Enterprises, businesses and industrial workspaces.	
LMUA 11: rear of 34-40 Plashet Grove	• Light industrial uses and local supply chain. • Workshops for cultural and creative production and local supply chain.	
LMUA12: Bidder Street	• Light industrial, warehousing and logistics and workspaces. • Cultural and creative production, digital and technology industries, SMEs, flexible workspaces and storage.	

Table 9: Local Mixed Use Areas (LMUAs)

Local Mixed Use Areas (LMUAs)		
Designation	**Priority Uses**	**Functional requirements**
LMUA 13: Glory House, Tabernacle Avenue	• Light industrial uses and storage. • Industrial workshops, cultural and creative production.	i. Employment-led co-location with residential development is supported.
LMUA14: Beeby Road	• Light industrial and small scale office and workspaces. • Production and manufacturing, cultural and creative production, local businesses.	
LMUA15: Esk Road	• Light industrial and small scale warehousing and storage. • Manufacturing and production, local supply chain and storage.	
LMUA16: Canning Road East	• Light industrial, warehousing and distribution. • Food production/manufacturing, wholesale storage.	
LMUA17: Builders Merchants, Southend Road	• Light industrial workshops, local supply chain and storage. • Cultural and creative production, workshops and storage.	

d. The development of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)) will be supported within Micro Business Opportunity Areas (MBOAs) as part of employment-led development. Uses identified in Table 10 should be prioritised in each location.

e. The development of office floorspace (E(g)(i)) will be protected and supported within town centres as reflected in Table 11 and in accordance with Local Plan Policies HS1 and HS2.

f. The development of a range of employment floorspace (office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2) and storage or distribution (B8)) to support the growth of new economic sectors, is supported on site allocations identified for mixed-use or employment-led development, where the delivered floorspace is in conformity with the development principles set out in the site allocations.

3. All major developments incorporating employment floorspace in designated employment locations, town centres and relevant site allocations identified for employment use, as well as all developments incorporating employment floorspace outside above locations are required to submit an Economic Strategy that details:
   a. how the proposed floorspace responds to the latest demand evidence and Newham's economic objectives; and
   b. market testing for the proposed type, scale and tenure of employment floorspace; and
   c. a phasing strategy for employment floorspace to maximise occupancy.

Table 10: Micro Business Opportunity Areas (MBOAs)

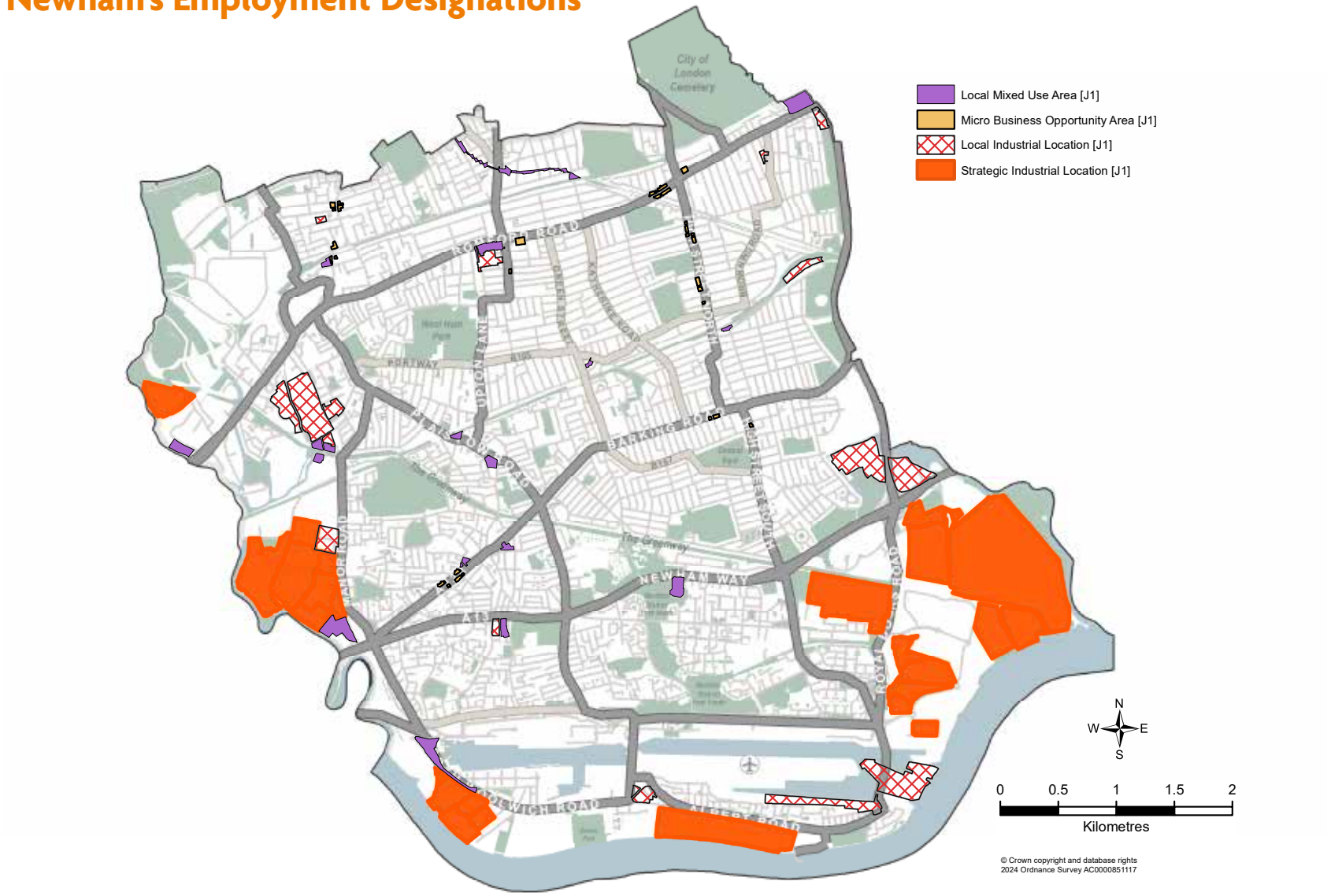
Table 9: Micro Business Opportunity Areas (MBOAs)		
Designation	**Priority Uses**	**Functional requirements**
MBOA 1: Canning Town MBOA 2: East Ham MBOA 3: Forest Gate MBOA 4: Manor Park MBOA 5: Stratford	• Local business and workspace accommodation. • Flexible, low-cost and/or affordable workspaces for micro businesses and start-ups.	i. Employment-led co-location with residential development is supported.

Table 11: Town Centres

Town Centres	
Designation[28]	**Priority Uses**
Metropolitan Centre: Stratford	• Major office (E(g)(i)) development, including Grade A space (i.e. modern premises that offer highest quality hierarchy of amenities and facilities). • Office-related research and development (E(g)(ii)) floorspace. • Workspaces, in particular low-cost workspace for cultural and creative production and SMEs.
Major Centres: East Ham	• Smaller-scale office uses. This includes flexible, low-cost workspaces for micro businesses and SMEs.
District Centres: Green Street Forest Gate East Beckton Canning Town Beckton Riverside	

[28] Where the latest London Plan sets out changes to the existing scale of a town centre, this will supersede those set out in this table.

Map of Newham's Employment Designations



Justification

3.154 The council is required by national and regional policy to plan positively to ensure a sufficient supply of land in the right places to support economic growth. Jobs in Newham are expected to grow within the Local Plan period. This policy sets out the approach to enabling, growing and diversifying Newham's economy through safeguarding and promoting high quality employment locations to support investment and job creation. This policy is evidenced by the employment need figure and market view.

3.155 Newham is attractive to a range of sectors. These include light industrial, warehousing and logistics, manufacturing and cultural and creative production. Newham is also home to a buoyant number of start-ups and micro businesses. While Newham currently specialises in food and drink production, manufacturing, transport and utilities, the Employment Land Review (2022) identifies future growth sectors. In particular, there is an opportunity for growth in warehousing and logistics, green technology, cultural and creative production, manufacturing and construction. All of which service both local and wider London needs. This policy sets out Newham's approach to enabling growth within current and emerging sectors by distributing appropriate types, scales and designs of employment floorspace across the borough. The policy directs sectors to suitable locations where businesses and industries can thrive, while ensuring that all new employment floorspace supports evidenced local and strategic economic needs. The requirement for an Economic Strategy to support development proposals with employment floorspace, ensures delivery of floorspace and employment types which the borough requires to meet its economic objectives and market needs.

3.156 A summary of the employment supply and demand figure as outlined in the Employment Land Review (2022) and the subsequent Employment Land Requirement Update (2025) is set out below (figures may not sum due to rounding).

3.157 The Employment Land Review (2022) concludes that across the borough and specifically in Stratford and the Royal Docks, there is more than sufficient pipeline supply to meet economic needs. However, the study highlights that permitted office floorspace growth has been confined to Stratford and the Royal Docks, with the rest of the borough experiencing more floorspace lost than gained. In addition, there is significant uncertainty around the office market and the delivery of the pipeline schemes. As such, the study concludes that office space should be directed towards Stratford Town Centre, reflecting its role in the London Plan 2021 as a potential Central Office Satellite. The policy follows this approach but does allow some flexibility, with the need figure set as a minimum to ensure future economic growth is not constrained and there is sufficient flexibility to accommodate any future changes in evidenced need for office space.

Table 12: Office Market Balance

Dataset	Demand			Total Pipeline Supply (sqm)	Balance (sqm)
	Jobs change (2021-42)	Net (sqm)	Gross (sqm)		
		Floorspace			
Office (Experian forecast growth, BRES 2020)	6,328	94,348	117,994	LLDC: 158,358 Royal Docks: 459,534 Rest of Newham: 20,176 **Total: 638,069**	Oversupply of +520,124
Office (Greater London Authority's projections)	12,530	188,996	208,517		Oversupply of +429,551

Table 13: Industrial Market Balance

Dataset	Demand			Gross Supply (sqm)	Balance (sqm)
	Jobs change (2021-42)	Net (sqm)	Gross (sqm)		
		Floorspace			
Industrial and Warehousing (10 year past job trend) Experian, based on past job change by land use in job delivery (2009-19)	6,361	374,659	417,584	Permissions: 35,351 Sites with industrial potential in planning: 95,500 Sites with potential for intensification[29]: 351, 945 **Total: 483,796**	Permissions undersupply of -381,508 Total (permissions, in planning and intensification sites) Oversupply of +66,212
Industrial and Warehousing (economic forecast) Experian forecast data, BRES 2020, Stantec sector to land use mapping	3,402	221,311	264,235		Permissions undersupply of -227,884 Total (permissions, in planning and intensification sites) Oversupply of +219,561

3.158 Overall the Employment Land Review (2022) and the subsequent Employment Land Requirement Update (2025) highlights that all past trend and forecast data shows a positive need for industrial land. This finding also aligns with the market view. Newham's pipeline of supply is not sufficient to meet this need, nor are the sites, with industrial potential, currently in planning. Therefore, to meet this economic demand and enable employment growth, the policy requires there to be no further release of industrial land and for industrial development to take the form of intensification to deliver further industrial floorspace and not co-location with residential, unless explicitly stated as suitable for mixed-use in Local Plan Policy J1.



[29] Including the 10 Strategic Industrial Locations/Local Industrial Locations with potential for intensification in the plan period identified in Table 4.5 of the Employment Land Review (2022).

Implementation

J1.1	Newham has an identified need for both industrial uses as well as warehousing and logistics (including storage and distribution floorspace) and office space over the plan period. Applicants proposing employment floorspace within developments, in suitable locations, are required to provide net increases in floorspace to contribute to the identified need figures, while making the most efficient use of land. The council's Employment Land Review (2022) (or subsequent updates) provides further detail on the sectors in most demand, alongside an assessment of employment site allocations. All developments have to follow requirements as set out in Policy J4 to achieve a diverse, inclusive and green economy.
J1.2	Development proposals for employment floorspace must support the overarching economic vision set out in this policy and the spatial strategy, to deliver a range of workspaces and to enable growth in Newham's key economic sectors. Applicants proposing employment floorspace must align their proposals to the supported planning land uses, priority uses and functional requirements as set out in Tables 7 to 11 in this policy. The tables have been informed by the Employment Land Review (2022) and the subsequent Employment Land Requirement Update (2025), as well as the wider economic strategies of the council. <u>Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs)</u> SILs are critical to the economic function of London's economy. SILs identified in Table 7 are the same as the SILs identified in London Plan Policy E5. LILs are locations of particular importance for industrial uses which support local economic growth. LILs identified in Table 8 are the equivalent of Locally Significant Industrial Sites (LSIS) as set out in London Plan Policy E6. These will be protected and intensified.

J1.2	To meet the industrial demand and enable employment growth, industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. Where Strategic Industrial Locations and Local Industrial Locations have been identified as sites with potential for intensification in the plan period under Table 4.5 of the Employment Land Review (2022), the Council will work proactively with site owners and industrial occupiers to explore the opportunities for optimisation of industrial capacity at these sites where appropriate. It is also acknowledged that some of these sites are owned by the Council, which provides additional opportunities for proactive planning for industrial intensification to achieve the objective of this policy. In cases where new industrial-related employment floorspace within uses for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) or industrial related sui generis (SG) uses is proposed on the borough's existing retail and leisure parks with good connection to the Strategic Road Network (A12, A13 and A406), industrial intensification criteria will apply. To ensure the suitability of a proposed location, uses will only be supported where it can be demonstrated the Strategic Road Network is a requirement for the economic use as per London Plan Policy E4.D. Development for employment floorspace is expected to contribute to a greener future and deliver more sustainable transport options including how a site is serviced as set out in Local Plan Policy T4.

J1.2

Local Mixed Use Areas (LMUAs)

LMUAs are employment-led designations protecting and promoting uses for office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)) and storage or distribution (B8) (including dark kitchen/shop and micro fulfilment). Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met. This will involve a co-design and market engagement exercise that establishes the optimum quantity and format of employment space which can meet market demand on the site. All co-location proposals delivering uses other than residential have to comply with the requirements set out in the High Street Policy and Social Infrastructure Policy in the Local Plan where relevant to the proposed uses.

Micro Business Opportunity Areas (MBOAs)

MBOAs are accessible locations complementing town centres, to provide smaller scale local and lower cost employment opportunities. Proposals within these locations should deliver a diverse range of (non-speculative) workspaces for micro businesses (i.e. enterprises which employ less than 10 people) mainly in edge of centre locations, as supported in London Plan Policy E2. Proposals in these locations are also required to be employment-led. All co-location proposals delivering uses other than residential have to comply with the requirements set out in the High Street Policy and Social Infrastructure Policy in the Local Plan where relevant to the proposed uses.

J1.2

Employment uses outside designated employment land

Employment uses proposed on site allocations identified for mixed-use or employment-led development, will be expected to deliver a range of priority uses. Applicants must align their proposals with the spatial strategy, site allocation objectives and local market evidence in the submission. Specific site allocations supported for mixed-use or employment-led development with priority uses as outlined in the Neighbourhoods Section of the Local Plan are listed in Local Plan Policy J2.2 implementation section. Proposals for employment uses in town centres have to meet requirements as set out in the High Street Policy in the Local Plan.

Developments incorporating employment floorspaces on designated employment locations or site allocations that deviate from the priority uses will need to be sufficiently justified by economic evidence justifying the location and market demand. Any co-location proposals need to provide evidence to demonstrate that any other elements of the proposal do not prejudice the viable operation of employment uses on the site and where relevant, adjacent sites, and are designed to be compatible with residential uses, in accordance with Local Plan Policy D6.

All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy.

J1.2	Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. The Policies Map provides the locations of the borough's designated employment land. All locations outside designated employment locations as set out in Tables 7-10 in this policy (including site allocations and town centres) are regarded as non-designated employment locations.
J1.3	All major developments incorporating employment floorspace in designated employment locations, town centres and relevant site allocations identified for employment use, as well as all developments incorporating employment floorspace outside above locations must submit a robustly evidenced Economic Strategy, which must provide the appropriate economic assessment of each proposal. Submissions will need to meet the following requirements: • Detail the typology and format of new workspace and demonstrate how it supports the needs of occupiers within one of Newham's priority growth industries and in accordance with Local Plan Policy J1 Part 2. • Proposals that deviate from the priority uses will need to be sufficiently justified by location and market demand evidence on how the proposed development supports economic objectives set out in this policy with reference to the Employment Land Review (2022) (or subsequent updates), and consider the opportunity cost against alternative scenarios of employment uses at the site. • Applicants must also provide an overview of development phasing to demonstrate how their proposed approach will maximise occupancy. Phasing is particularly important in relation to the deployment of meanwhile uses, infrastructure sufficiency and in some cases where employment floorspace comes forward ahead of residential uses on mixed-use development.
J1.3	• Economic Strategies will need to incorporate and demonstrate how the requirements of Local Plan Policy J4 can be met, particularly the delivery of Community Wealth Building objectives as set out in Local Plan Policy J4 Part 4.

Evidence base

- Proposed New Employment Land Designations and Boundary Amendments, London Borough of Newham (2024)
- Employment Land Review for the London Borough of Newham, Stantec UK (2022)
- Employment Land Requirement 2021-2042 Update, Rapleys (2025)
- Royal Docks Team Economic Purpose, Hatch Regeneris (2019)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-design masterplanning
- D1: Design standards
- D6: Neighbourliness
- T4: Servicing a development
- Section 4: Neighbourhoods

London Plan 2021:

- E1: Offices
- E2: Providing suitable business space
- E4: Land for industry, logistics and services to support London's economic functions
- E5: Strategic Industrial Locations
- E6: Locally Significant Industrial Sites
- E7: Industrial intensification, co-location and substitution

Policy J2: New employment floorspace

1. All developments on Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification format.

2. Within the employment sites listed in Policy J1 Tables 7-10 and site allocations, co-location with residential development is only supported in the specific Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Areas (MBOAs) identified in Tables 9 and 10 in Local Plan Policy J1 and specific site allocations and where:
    a. the development remains employment-led in LMUAs, MBOAs and site allocations identified for employment-led development; and
    b. a suitable co-location design can be accommodated which maintains the function and viability of the priority uses on site and the amenity of the residential accommodation; and
    c. a suitable and robust Relocation Strategy for any existing businesses that cannot be incorporated within the redevelopment is provided in accordance with Local Plan Policies J3.2 ad J3.3.

3. All developments for new employment floorspace, outside of the locations identified in Local Plan Policy J1, will be supported if one of the following criteria is met:
    a. the development results in an increase in employment floorspace (particularly for general industrial (B2), light industrial (E(g)(iii)) or storage or distribution (B8) to support local supply chains) on an existing non-designated industrial site of 0.1ha or more, or with operational employment floorspace of 1,000 sqm or more; or
    b. the development will deliver employment floorspace in an area which is not currently covered by the network of well-connected employment opportunities for residents; or
    c. the development will deliver 100 per cent affordable workspace.

4. All standalone office (E(g)(i)) developments outside designated town centres and MBOAs (including developments on LMUAs and site allocations) will be subject to:
    a. a sequential test; and
    b. where the development will provide 300sqm GIA, or more, of office floorspace, an impact assessment of the proposed office floorspace.

5. New developments for office (E(g)(i)), research and development (E(g)(ii)) and light industrial (E(g)(iii)) floorspace within MBOAs must support workspaces for micro businesses to accommodate no more than ten employees.



Justification

3.159 Newham's employment land is an important asset, which plays a critical role in supporting both strategic and local economic needs. The Employment Land Review (2022) and the subsequent Employment Land Requirement Update (2025) highlights that there is limited industrial land availability across London coupled with strong demand for industrial floorspace. Reflecting this, the policy requires the protection of all strategic and local employment locations, making the most efficient use of employment land through intensification and ensures that any residential development on an employment-led designation is sensitively designed.

3.160 To maximise Newham's economic potential and meet its economic needs in full, new employment floorspace on non-designated industrial sites will be supported, where spatial and functional economic objectives can be met. This approach recognises that non-designated industrial sites are key to delivering a range of Local Plan objectives including: improving people's access to local economic opportunities as part of the commitment to delivering a network of well-connected neighbourhoods and the Community Wealth Building approach.

3.161 For office development, the Employment Land Review (2022) and the subsequent Employment Land Requirement Update (2025) identified that Newham's office stock and pipeline currently exceeds demand. Therefore, the policy looks to direct new office development to suitable locations (as set out in Local Plan Policy J1), or as part of a mixed-use development where demand can be demonstrated or via the sequential test prioritising town centres first.

Implementation

J2.1	All developments which seek to intensify industrial floorspace for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis uses (including waste, utilities including digital/data and transport depots) within SILs and LILs will be supported in principle. This is in line with the approach set by London Plan Policy E7. As directed by the Employment Land Review (2022), all industrial developments are expected to explore the scope for multi-deck as a priority followed by other formats (including, but not limited to, stacked units, higher plot ratios, or more intensive internal arrangements where appropriate).

J2.1	All developments that cannot deliver net increases in industrial floorspace must provide evidence which outlines: • that all intensification formats set out above have been fully explored and cannot be delivered due to lack of demand and/or significant viability and/or site constraints; and • why their proposal delivers the best alternative intensified employment provision. This should be provided as part of the Economic Strategy. This should be provided as part of the submission. To support implementation of this policy further guidance on the most appropriate formats for industrial intensification in Newham are set out in the Characterisation Study (2024) and Employment Land Review (2022). Proposals should align with the London Plan 2021 and associated guidance/examples set out in the Greater London Authority's Industrial Intensification Practice Note (2018) Intensification and Co-Location Study (2018) and the emerging Industrial Land and Uses London Plan Guidance.

J2.2

This policy is supported by guidance in the Characterisation Study (2024) on co-location and the principles to consider when integrating industrial and residential uses. Co-location developments are also subject to the compatibility considerations set out in Local Plan Policy J1 Part 2. Co-location on specific site allocations outside any SIL or LIL designations will be supported in form of mixed-use or employment-led development with priority uses as outlined in Section 4 of the Local Plan.

The site allocations are listed below:

- N1.SA1 North Woolwich Gateway
- N2.SA1 Silvertown Quays
- N2.SA2 Lyle Park West
- N2.SA3 Connaught Riverside
- N2.SA4 Thameside West
- N3.SA1 Royal Albert North
- N4.SA2 Silvertown Way East
- N4.SA3 Canning Town Holiday Inn
- N4.SA5 Canning Town Riverside
- N7.SA2 Twelvetrees Park and Former Bromley By Bow Gaswork
- N7.SA3 Sugar House Island
- N8.SA1 Stratford Centre
- N8.SA2 Stratford Station
- N8.SA3 Greater Carpenters District
- N8.SA4 Stratford High Street Bingo Hall
- N8.SA5 Stratford Town Centre West
- N8.SA6 Stratford Waterfront South
- N8.SA7 Rick Roberts Way
- N8.SA9 Pudding Mill
- N8.SA10 Chobham Farm North
- N11.SA3 Alpine Way
- N15.SA2 Woodgrange Road West

J2.2

Co-location developments are expected to incorporate employment floorspace to accommodate existing businesses. For any existing businesses that cannot be accommodated on site (including for any temporary period that existing businesses cannot be operated on site during the phase of site assembly or construction), a Relocation Strategy will be required as part of the Planning Statement to demonstrate that reasonable endeavours have been made to relocate the existing business(es) to a suitable alternative site in Newham.

The Relocation Strategy should include the following details:

- analysis to understand the existing business(es) on site including type of use, scale and employment; and
- assessment on the feasibility to retain existing business(es) on site and robust justification on why relocation is needed; and
- evidence of proactive engagement with affected business(es) to understand their operational requirements, offering at least three suitable alternative sites and demonstrate how the relocation can meet business needs in consideration of size, cost and location; and
- justification on how the relocated businesses can continue to meet their local and regional economic role; and
- assessment on the possibility for provision of 'meanwhile premises' on site before relocation for transition purpose if necessary; and
- how such a move relates to site phasing.

J2.3

All developments outside of designated employment locations, town centres and relevant site allocations identified for employment use will be assessed in line with the criteria set out in this policy. Non-designated industrial sites are locations being used for industrial and related purposes as per London Plan Policy E7.

Development proposals must include the submission of up-to-date spatial mapping of the 15 minute employment network.

J2.3	This mapping exercise must identify the development site location in the context of all employment locations (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 level of employment coverage around the site and whether the proposed site is in an area which is not currently covered by the network of well-connected employment opportunities for residents. Affordable workspace is defined in accordance with the London Plan 2021 as "workspace at rents maintained below market rate for specific sectors that have social or cultural value or are disadvantaged groups" and any provision must also meet the requirements of Local Plan Policy J4 Part 4. All developments with employment floorspace situated outside designated employment locations and major developments on relevant site allocations identified for employment use are also required to submit an Economic Strategy in accordance with the requirements set out in Local Plan Policy J1 Part 3.
J2.4	Standalone office developments, outside of town centres and MBOAs (including those on site allocations and LMUAs) must comply with the sequential test and impact assessment approach as set out in the NPPF. Proposals for office developments should be focused within town centres, and if no sites are available, edge of centre sites should be explored including MBOAs. In line with London Plan Policy SD7, applicants must demonstrate through an impact assessment there is no harm to the vitality and viability of centres by the approval of edge of centre or out of centre office development.

J2.4	Standalone office development is defined as proposals that propose new office (E(g)(i)) floorspace outside of town centres and MBOAs and are not ancillary in scale and function to another land use conforming designation. All major developments for employment uses are subject to a demand assessment as part of the Economic Strategy as per Local Plan Policy J1 Part 3 and conditions for restricting uses may be used where appropriate.
J2.5	MBOAs support low-cost and/or affordable workspace for micro businesses in accessible locations close to town centres. Proposals for micro businesses are defined as enterprises which employ less than 10 people as defined by the Financial Conduct Authority. This must form part of the Employment Strategy. This policy supports the ambitions of London Plan Policy E2.



Evidence base

- Draft Industrial Land and Uses London Plan Guidance, Greater London Authority (2023)
- Employment Land Review for London Borough of Newham, Stantec UK (2022)
- Employment Land Requirement 2021-2042 Update, Rapleys (2025)
- Retail and Leisure Study (2022), Urban Shape Planning Consultants (2022)
- Making Space: Accommodating London's Industrial Future, Centre for London (2022)
- London Intensification and Co-Location Through Plan-Led and Masterplan Approaches: Practice Note, Greater London Authority (2018)
- Mayor of London's Land for Transport and Industry Supplementary Planning Guidance (2012)

Policy Links

Local Plan:

- BFN1: Spatial strategy
- BFN2: Co-designed masterplanning
- HS1: Newham's Town Centre Network
- HS2: Managing new and existing Town and Local Centres
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants cafes and services
- D6: Neighbourliness
- Section 4: Neighbourhoods

London Plan 2021:

- D13: Agent of Change
- E2: Providing suitable business space
- E4: Land For industry, logistics and services to support London's economic functions
- E5: Strategic Industrial Locations
- E6: Locally Significant Industrial Sites
- E7: Industrial intensification, co-Location and substitution



Policy J3: Protecting employment floorspace capacity

1. All developments that result in the net loss of employment capacity in terms of floorspace (including yard space) or jobs on Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) will generally not be supported. In the limited circumstances where it is considered appropriate for development to result in the net loss of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) floorspace or jobs, developments are required to:
    a. provide a suitable and robust Relocation Strategy to relocate any existing businesses to suitable alternative employment premises or sites; and
    b. provide financial contributions towards skills, training and local employment initiatives.

2. All developments that result in net loss of employment capacity in terms of floorspace (including yard space) or jobs on Local Mixed Use Areas (LMUAs) will not be supported and should seek to reprovide suitable employment floorspace. Developments on LMUAs which cannot incorporate employment floorspace to accommodate any existing businesses are required to provide a suitable and robust Relocation Strategy to relocate these existing businesses to suitable alternative employment premises or sites.

3. Proposals that result in the net loss of employment capacity in terms of floorspace (including yard space) or jobs on Micro Business Opportunity Areas (MBOAs) will not be supported. Proposals that result in the loss of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) floorspace or jobs, developments are required to:
    a. provide a suitable and robust Relocation Strategy to relocate any existing businesses to suitable alternative employment premises or sites; and
    b. provide replacement office (E(g)(i)), research and development (E(g)(ii)) or light industrial (E(g)(iii)) floorspace to support the delivery of low-cost and/or affordable workspaces for micro businesses.

4. All developments in site allocations designated to deliver employment floorspace should seek to reprovide suitable employment floorspace capacity unless proposal can demonstrate that there is no current or future demand for employment uses for the site through thorough marketing activity. All developments in site allocations with existing in-use employment floorspace, which cannot incorporate employment floorspace to accommodate these existing businesses, are required to provide a suitable and robust Relocation Strategy to relocate any existing businesses to suitable alternative employment premises or sites.

5. Proposals that result in the net loss of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general Industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) floorspace capacity outside employment designations and site allocations will only be supported if the following criteria are met:
    a. there is no current or future demand for employment uses for the site, demonstrated through thorough marketing activity; and
    b. the loss of employment floorspace does not create a deficiency within the 15 minute network.

Planning Obligations

- Contributions will be sought where there is a net loss of employment floorspace towards skills, training and local employment initiatives will be secured via a development's legal agreement. These will be calculated using the following formula:

  Calculating the net loss of general industrial (B2) floorspace and equating this to jobs using the HCA Employment Densities 2015 (or subsequent updates).Multiplying the jobs lost figure to the cost per resident into training and full time employment.

Justification

3.162 The Employment Land Review (2022) demonstrates the need for the strong protection and safeguarding of industrial land, ensuring it is managed for intensification and growth as well as ensuring existing premises and viable floorspace is sufficiently protected with a no net loss position.

3.163 For proposals on SILs and LILs no net loss of existing industrial floorspace (including yard space) is justified by the strong demand for industrial land and high levels of historic industrial land release across London. This is critical to support London's economic needs, the sub-region and within Newham. In very limited circumstances, where a net loss of employment floorspace is justified, it is important that Newham does not lose the economic capacity as a result. Therefore, endeavours must be made to relocate any existing businesses within Newham and, through financial contributions, to support wider employment initiatives for training, skills development and jobs. This is a key component of the Community Wealth Building approach to support local residents into employment and protect Newham's strong economic base.

3.164 Town centres, MBOAs, LMUAs and non-designated employment locations all serve a more localised need and are recognised as valuable components of Newham's economic network by offering a range of cost efficient and locally important spaces such as flexible workspace to support new ways of working.

3.165 In LMUAs and site allocations identified for employment uses, existing employment floorspace must be protected. This is to maximise economic opportunities and ensure the protection and provision of important and viable employment floorspace in Newham. This is generally secondary stock across the borough which offers a range of local economic functions. The policy does recognise that employment land in some locations may no longer be viable, but given the need and role of employment land, this requires rigorous market testing before any loss can be accepted.

Implementation

ALL	In applying the principle for no net loss of employment floorspace capacity, the following definition should be used: • On an actively operating employment site, the existing floorspace (including yard space) should inform capacity calculations. • On a vacant employment site, the most recent employment floorspace prior to any demolition, or any recent consent that has secured a minimum amount of employment floorspace at the site, whichever is appropriate, should inform capacity calculations. • On a site with building(s) previously in employment use that have been disused or partially disused, the gross internal area of the existing building(s) should inform capacity calculations. • Meanwhile use is not counted towards employment floorspace capacity.

ALL	Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)((iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: • the floorspace to be relocated or replaced is within a SIL or LIL; or • the replacement and relocated floorspace is within a SIL or LIL; or the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.
J3.1	As a principle, the net loss of existing employment capacity including floorspace or jobs on Strategic Industrial Land (SILs) and Local Industrial Location (LILs) is not supported. In very limited circumstances, where the net loss of employment space and/or loss of businesses is outweighed by other material considerations as part of the planning assessment and there are no significant adverse impact on the overall amount of employment floorspace on SILs and LILs, the council will seek to secure contributions towards skills, training and local employment initiatives as per Local Plan Policy J4. The financial contribution will not be considered a benefit of the scheme when making the planning assessment. All developments on SILs and LILs are expected to incorporate employment floorspace to accommodate existing businesses. For any existing businesses that cannot be accommodated on site (including during any temporary period that existing businesses cannot be operated on site due to site assembly or construction), a Relocation Strategy will be required as part of the Planning Statement to demonstrate that reasonable endeavours have been made to relocate the existing business(es) to a suitable alternative site in Newham.

J3.1	The Relocation Strategy should include the following details: • analysis to understand existing business(es) on site including type of use, scale and employment; and • assessment of the feasibility to retain existing business(es) on site and robust justification of why relocation is needed; and • evidence of proactive engagement with affected business(es) to understand their operational requirements, offering at least three suitable alternative sites and demonstrating how the relocation can meet business needs considering size, cost and location; and • justification of how the relocated businesses can continue to meet their local and regional economic role; and • assessment of the possibility for provision of 'meanwhile premises' on site before relocation for transition purpose if necessary; and • how such a move relates to site phasing.
J3.2	There should be no net loss of existing employment capacity including floorspace or jobs on Local Mixed Use Areas. Where developments cannot incorporate employment floorspace to accommodate existing business(es), applicants must demonstrate that reasonable endeavours have been made to relocate the existing business(es) to a suitable alternative site in Newham by submitting a Relocation Strategy as part of the Planning Statement including all the details as set out in the implementation text for Local Plan Policy J3 Part 1.
J3.3	Micro Business Opportunity Areas support low-cost and/or affordable workspaces for micro businesses and Small and Medium Enterprises (SMEs) in accessible locations close to town centres. Proposals are expected to demonstrate how replacement floorspace continues to protect these locations, providing low-cost and/or affordable workspaces for businesses. Where occupied low-cost and/or affordable floorspace forms part of the existing uses, this is expected to be replaced. This policy supports the ambitions of London Plan Policies E2 and E3.

J3.4 All existing employment uses within site allocations should either be protected, if on a site allocation designated to deliver employment floorspace, or relocated, if on a site allocation only designated to deliver non-employment uses. Any site allocation delivering co-location of employment and residential uses must meet requirements of Local Plan Policy J2 Part 2. For any existing employment use that cannot be incorporated on the site, the applicant must demonstrate that reasonable endeavours have been made to relocate the existing business(es) to a suitable alternative site in Newham by submitting a Relocation Strategy as part of the Planning Statement including all the details as set out in Local Plan Policy J3.1 implementation text.

J3.5 All viable employment floorspace outside employment designations and site allocations will be protected. Applicants must seek to protect employment floorspace in these locations including in a mixed-use format.

Loss of employment floorspace will only be considered acceptable when suitably robust evidence can be provided to demonstrate that there is no current or future likely demand for the space. Evidence must be submitted to demonstrate that the site has no realistic prospect being used as an employment use in the foreseeable future. The marketing evidence should include:

- 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 (include option for sub-division and mixed-use development); and
- 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

J3.5

- a record of all expressions of interest received with full reasons given as to why any offer was not accepted.

This process is recognised as part of London Plan Policy E7.

Applicants must also submit up to date spatial mapping of the 15 minute employment network. This mapping exercise must identify the development site location in the context of the 15 minute network of all employment locations (including town centres). Each employment 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 employment site. This will demonstrate the level of employment coverage around the site and if the loss of employment in this location would create a deficiency in the network of well-connected employment opportunities for residents, factoring in any pedestrian barriers and access challenges in the urban context.



Evidence base

- Employment Land Review for London Borough of Newham, Stantec UK (2022)
- Employment Land Requirement 2021-2042 Update, Rapleys (2025)
- Land for Transport and Industry Supplementary Planning Guidance, Greater London Authority (2012)

Policy Links

Local Plan 2022:

- BNF1: Spatial strategy
- BNF3: Social Value And Health Impact Assessments – Delivering Social Value, Health and Wellbeing
- HS1: Newham's Town Centre Network
- HS2: Managing new and existing Town and Local Centres
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants cafes and services

London Plan 2021:

- E2: Providing suitable business space
- E3: Affordable workspace
- E4: Land for industry, logistics and services to support London's economic functions
- E5: Strategic Industrial Locations
- E6: Locally Significant Industrial Sites
- E7: Industrial intensification, co-location and



Policy J4: Delivering Community Wealth Building and Inclusive Growth

1. All development is expected to create high quality economic opportunities for all by delivering the following requirements:
    a. all development proposals delivering employment floorspace must demonstrate commitment to deliver the principles of Community Wealth Building as set out in the Community Wealth Building Business Pledges; and
    b. all development proposals delivering employment floorspace must work with the council's recognised employment and training broker and/or education providers to maximise economic and training opportunities and improve skills for Newham residents; and
    c. as a minimum, all major developments must help Newham residents access high quality employment in the construction or/and end-user stage by providing a tariff-based contribution and an Employment Strategy which secures 35 per cent construction phase (all major developments) and 50 per cent end-user phase jobs (for all developments delivering employment floorspace) for Newham residents.

2. Employment-led developments on site allocations (including mixed-use) must incorporate suitable ancillary childcare facilities to meet additional need, where this cannot be met by existing local facilities.

3. All developments incorporating employment floorspace must commit to supporting a just transition to a greener economic future and take advantage of new economic opportunities in the green economy by
    a. promoting resource efficiency and supporting Net Zero Carbon as set out in Local Plan Policy CE2; and
    b. promoting local supply chains; and/or
    c. delivering the principles of the circular and sharing economy to reduce and reuse waste in line with Local Plan Policy CE5; and/or
    d. providing training in existing and emerging green industries; and/or
    e. creating new jobs in green industries.

4. The provision of affordable workspace to support Newham's economy will be supported on employment designations, site allocations and appropriate non-designated locations (including as part of a mixed-use proposal) where the following criteria are met:
    a. there is need for this type of workspace in this location; and
    b. it will support the growth of micro businesses and Small and Medium Enterprises, cultural and creative sectors, or light industrial uses; and
    c. the quality and size of the proposed units provide flexible workspace that meets the needs of end users.

Planning Obligations

- Contributions towards skills, training and local employment initiatives at the construction and end user phase will be secured via a development's legal agreement. These will be calculated using the following formula:

Construction Phase:
The total number of jobs will be calculated using the assumed direct jobs per £1million of construction investment (HCA cost per jobs 2015 3rd edition).
35 per cent of total jobs x £3,867 (cost (£) per London Borough of Newham resident into training and full time employment) = financial contribution.

End User Phase:
The total number of jobs will be calculated using the assumed employee yield (using HCA Employment Densities for general industrial (B2) uses (36 sqm GIA per full time employee), 2015 3rd Edition).
50 per cent of total end user jobs x £3,867 cost (£) per London Borough of Newham resident into training and full time employment = financial contribution).

- Affordable workspace rent and/or specific social, cultural or economic development purpose will be secured in perpetuity or for a period of at least 15 years by legal agreements in planning or other agreements (such as grant and management arrangements) with relevant review mechanism.

Justification

3.166 In line with the council's priority to support Community Wealth Building, this policy seeks to tackle inequality and ensure that everyone, regardless of skills, experience or background can meaningfully share and take an active part in Newham's economy. The Employment and Health in Newham Assessment (July 2022) identified that high quality employment which provides job security, a sense of identity and purpose and income is a significant determinant of improved health and well-being. The assessment identified that residents experience barriers to employment including caring responsibilities (including around the availability of childcare), their mental or physical health, language and skills and that wages remain typically lower than the rest of London.

3.167 While Newham has seen some improvements in employment rates, unemployment is still slightly higher than the London and UK averages. Newham residents continue to experience unemployment or low paid and insecure jobs. The Employment and Health Needs Assessment (July 2022) also identified that young people (18-24 years), ethnically diverse communities, women and those with long term conditions, disabilities or mental health are most likely to be unemployed in Newham. This policy aims to create new opportunities including targeted support and securing new opportunities for local residents to develop skills, knowledge and training. It ensures that all new employment-led developments in the borough play their part in building an inclusive economy.

3.168 Newham is committed, as part of its economic recovery and climate emergency declaration, to creating a greener economy. Economic development has a central role in delivering this objective, through building design, business operations and business activity.

3.169 Evidence suggests as rents rise and with limited employment land available, existing premises could become less affordable over the Plan period. The policy enables affordable workspaces to be delivered particularly to support cultural and creative sectors, Small and Medium Enterprises and light industrial uses. In supporting a diverse range of workspaces, the aim is to support the already high levels of start-ups and micro businesses in Newham and to ensure businesses have spaces to thrive as an important component of ensuring a healthy and dynamic economy.

Implementation

J4.1	Applicants are expected to demonstrate how Community Wealth Building has been considered as part of each development proposal with employment floorspace in the Economic Strategy as outlined in Local Plan Policy J1 Part 3. Developments that are not required to submit an Economic Strategy would need to demonstrate the above in the Planning Statement. Applicants are required to make use of the Community Wealth Building Business Pledges as a measure of how new development can deliver local economic benefits, green economic ambitions as well as fairer and improved working opportunities. These pledges are: • Prioritising sustainability, e.g. reducing carbon footprint and more sustainable operations; • Buy Local, e.g. good and services; • Be a fair employer, e.g. London Living Wage; • Invest in staff, e.g. Mayor of London's Good Work Standard; • Support local residents, e.g. Utilising Our Newham Work; • Pursue innovation, e.g. embed Community Wealth Building principles; • Be a fair landlord, e.g. fairer terms for businesses. Applicants of all major developments are encouraged to liaise with the Newham's Community Wealth Building Team (linked with Newham's employment support brokerage) as part of their pre-application discussions.

J4.1 This will ensure that appropriate pathways and local economic opportunities are highlighted at the earliest possible opportunity. This should form part of the Economic Strategy (or part of the planning submission for development not requiring a Economic Strategy in accordance to Local Plan Policy J1) and will help to address the requirements set by this policy. Employment and training contributions will be secured through working with Community Wealth Building Team.

Applicants must work with the council's brokerage and/or established education providers to increase economic opportunities for the following:

- apprenticeships, placements and internships; or
- employment and skills training; or
- direct employment (including London Living Wage opportunities)
- unlocking economic opportunities for all Newham residents

including targeting those that may experience barriers to employment or identified groups more likely to be unemployed than others including those with caring responsibilities or mental or physical health challenges, young people (18-24) and women.

The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.

All employment contributions will be calculated using the average job density figures for general industrial (B2) uses.

J4.2 The availability of childcare is recognised as a barrier to employment. Where employment floorspace on site allocations are proposed, applicants are required to engage in early pre-application discussions with Newham's School Place Planning team and make an assessment of the increased demands for childcare facilities based on the latest Childcare Sufficiency Assessment, with the expectation that this is either met by existing local provision or new ancillary facilities in line with Policy SI4 Part 1 of Local Plan. The assessment should include anticipated demand from employees on employment uses on site allocations.

The council will consider this information against its latest evidence of existing childcare provision within a 15 minute walking distance of the development site. Requirements to include additional childcare provision will be applied on this basis. The design and quality of the childcare facilities should follow Local Plan Policy SI4.

J4.3 All development is expected to contribute to the overarching ambition to create a greener economy.

This policy sets out the approach to ensure all development embraces sustainable design and construction principles from the outset. This includes energy use, operational and whole life emissions, landscaping and design, transport impacts as well as supporting more localised supply chains across the borough.

All developments are required to demonstrate that energy use is minimised, in compliance with Local Plan Policy CE2 and CE3. Further guidance on the circular economy is outlined by the GLA's Circular Economy Supplementary Guidance (March 2022). Development proposals should adopt sustainable landscaping and design, as well as minimise transport impacts during both the construction and operational stages.

J4.3	All employment-led major developments are required to support the green economy in construction and operation, and as part of a proposal's overall economic purpose. They must demonstrate commitment to create new job opportunities and provide training and upskilling to ensure local communities and businesses have the required skills, knowledge and capacity to adopt green processes and embrace the opportunities offered by a green economy, including in existing and in emerging green industries. The above should be evidenced within the Economic Strategy. Developments that are not required to submit an Economic Strategy would need to demonstrate the above in the Planning Statement.
J4.4	Affordable Workspace is defined by the London Plan 2021 as "workspace at rents maintained below market rate for specific sectors that have social or cultural value or are disadvantaged groups". Provision can be provided or managed directly by workspace providers, public, charitable or private organisations. The rent and/or specific social, cultural or economic development purpose will be secured in perpetuity or for a period of at least 15 years. Where Affordable Workspace is proposed, the applicant must demonstrate how they have met criteria in this policy as part of the Economic Strategy submission. This includes details of how the workspace will be delivered including evidence of engagement with workspace providers. Applicants are encouraged to liaise with the Newham's Community Wealth Building Team at the pre-application stage to support this policy objective. This will ensure that, where necessary, appropriate affordable workspace providers can be involved early at the design stage.

Evidence base

- Towards a Better Newham COVID-19 Recovery Strategy, London Borough of Newham (2020)
- Employment Land Review for London Borough of Newham, Stantec UK (2022)
- Employment Land Requirement 2021-2042 Update, Rapleys (2025)
- Employment Densities Guidance 3rd Edition, Homes and Communities Agency (2015)Employment and Health in Newham Needs Assessment, London Borough of Newham (2022)

Policy Links

Local Plan:

- BNF1: Spatial strategy
- BNF3: Social Value and Health Impact Assessments – delivering social value, health and wellbeing
- BFN4: Developer contributions and infrastructure
- CE2: Zero Carbon development
- CE5: Retrofit and circular economy
- SI4: Education and childcare facilities

London Plan 2021:

- GG1: Building strong and inclusive communities
- E2: Providing suitable business space
- E3: Affordable workspace
- E11: Skills and opportunities for all
- SI7: Reducing waste and supporting the circular economy

HOMES

3.170 The delivery of genuinely high-quality, affordable homes helps our residents to live healthy and happy lives. When our homes are good quality, we are able to thrive in our neighbourhood.

3.171 Newham (including the area of the borough administered by the London Legacy Development Corporation at the time of the London Plan adoption) has one of the largest housing targets in the whole of London, with a requirement to deliver 47,600 homes in the ten years to 2029.[30] This means we will be providing homes to not only meet the borough's needs but also the housing needs of London's wider population. When providing more homes we need to deliver a mix of housing types and tenures that address significant housing issues that our residents face, such as homelessness, and meet pressing housing needs, particularly for affordable and family-sized homes.

3.172 In particular, there is an acute need in Newham for more social rent housing. Between 2011 and 2020 rents in Newham increased by 55 per cent, house prices have increased by 87 per cent, while wages have only risen by 37 per cent. Data from 2022/23 shows that 35,625 residents are on the authority's housing waiting list.[31] In recent years, Newham has also consistently had the highest rates of homeless households in temporary accommodation in the country, with 6,070 residents living in temporary accommodation as of September 2023.[32] The 2021 census also showed that 25% per cent of households in Newham are living in over-crowded conditions, the highest in London. Therefore, the housing policies in the Local Plan seek to deliver a significant increase in the number of social rent homes in Newham. These will only be available to residents on our housing waiting list, which will help to address the housing crisis our residents face.

3.173 We also want to diversify our housing offer, speed up construction and optimise the delivery of homes on both small and large sites, exploring the suitability of different types of housing including purpose-built, high-quality rented housing. We will seek to improve existing housing where we have influence, protect much-needed family housing and re-provide existing social rent homes as part of regeneration projects.

3.174 Delivering new homes also means addressing the needs of residents who require specialist or supported housing. In delivering these homes we will consider evidence of local need, the suitability of a home's location in relation to necessary services and the quality of housing provided. We will also ensure that delivery of specialist housing does not reduce or limit our ability to deliver general needs housing. Houses in multiple occupation will be located so that residents have better access to services and supporting facilities and to reduce amenity impacts, while student accommodation will be delivered where it is most needed and where it will benefit Newham's economy.

3.175 Finally, new housing should positively contribute to our residents' health and wellbeing, providing homes with flexible layouts and high-quality amenity spaces that people are able to remain in over the course of their lifetimes.

This section contains the following policies:

- **H1: Meeting housing needs**
- **H2: Protecting and improving existing housing**
- **H3: Affordable housing**
- **H4: Housing mix**
- **H5: Build to Rent housing**
- **H6: Supported and specialist housing**
- **H7: Specialist housing for older people**
- **H8: Purpose built student accommodation**
- **H9: Houses in multiple occupation and large-scale purpose-built shared living**
- **H10: Gypsy and Traveller accommodation**
- **H11: Housing design quality**



[30] This target reflects Newham's London Plan housing target of 32,800 homes, plus an additional 14,800 homes in the area of the borough administered by the London Legacy Development Corporation at the time of the London Plan adoption. This requirement has been added to Newham's housing target given the transition of planning powers from the London Legacy Development Corporation to Newham in December 2024. For further information see the 'Why do we need a Local Plan? Why refresh it?' sub-heading of the 'All about the Local Plan' section of the plan. [31] GOV.UK Local Authority Housing Data [32] GOV.UK Homelessness Statistics

Policy H1: Meeting housing needs

1. Newham will enable a net increase of between 45,611 and 53,954 quality residential units between 2027 and 2042. This will be achieved through:
    a. the majority of new residential units being brought forward on site allocations; and
    b. the optimisation of housing delivery on sites below 0.25 hectares in size; and
    c. supporting residential developments that come forward on windfall sites (unallocated or undesignated land) unless other policies within the Local Plan direct otherwise.

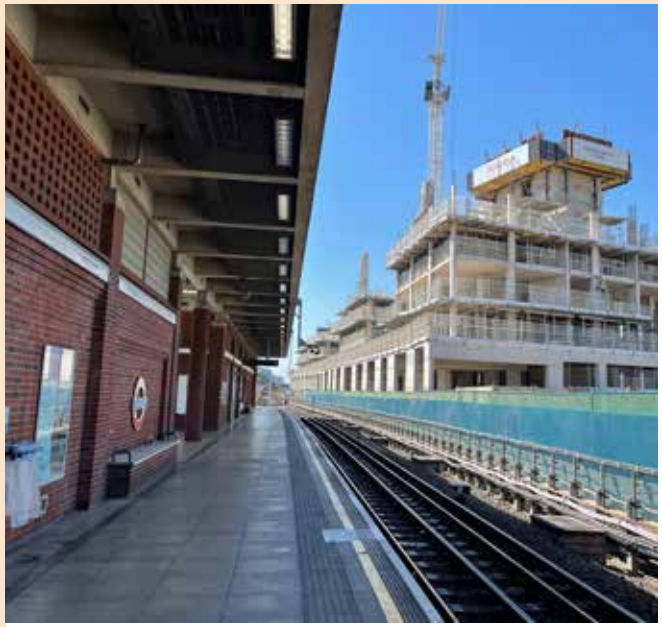
Supply will be measured through a stepped trajectory, based on the minimum housing requirement of 45,611, with a different minimum annual target for every phase of the Plan, as follows:

Delivery Period	Years	Minimum Annual Target
Phase 1a (Short term – 2021 London Plan period)	27/28 – 28/29	4,760
Phase 1b (Short term)	29/30 – 31/32	2,542
Phase 2 (Medium term)	32/33 – 36/37	2,631
Phase 3 (Long term)	37/38 – 41/42	3,062

2. Developments delivering residential units should optimise site capacity through a design-led approach, as set out in Local Plan Policy D3 and London Plan 2021 Policy D3, taking into account the site's context, capacity for growth and existing and planned supporting infrastructure capacity.

3. Sites Allocations or sites with a recent consent for general needs housing or part-residential development should be developed at least in part for general needs housing.

4. Developments that seek to deliver community-led housing, self-build or custom build housing will be supported in principle where they optimise site capacity through a design-led approach.



Justification

3.176 Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing. As part of the London Plan (2021), Newham has been set a strategic housing target of 47,600 homes to deliver between 2019 and 2029. However, in the years preceding the Local Plan housing target, Newham has delivered a shortfall of housing delivery against this target. Between 2019/20 and 2024/25 17,594 units were delivered in the borough, resulting in a shortfall of delivery of 10,966 units against the London Plan target. This has been a result of macro-economic factors such as high interest rates and inflation as well as the time it has taken for the industry to adjust to new policy and legislative requirements (for example, around building safety). Projected completion figures for the period 2025/26 to 2026/27 indicate that 3,916 further units will be delivered, meaning a total predicted shortfall of 16,570 homes against the London Plan target between 2019/20 and 2026/27.

3.177 A detailed review of each site allocation in the Local Plan suggests that delivery over the plan period is unlikely to meet the ambitious target set for the borough by the London Plan (2021) plus the borough's historic shortfall by 2028/29. Therefore, to respond to these factors the Local Plan seeks to propose a capacity-based target, via a stepped trajectory to reflect realistic delivery expectations.

While the Local Plan housing target is proposed to start from financial year 2027/28 (the year following adoption of the plan), for the avoidance of doubt the London Plan target will continue to apply in the period from the adoption of the Plan until 31 March 2029. Over the longer-term Newham will make up our historic shortfall against the London Plan target.

3.178 Over the course of our plan period Newham will look to enable the delivery of between 45,611 and 53,954 additional new homes. This range target is capacity-derived, based on: approved planning permission figures; design-led capacity testing of site allocations; capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment; and capacity assumptions from lapsed application sites. Newham has also taken forward the housing capacity assumptions on small sites set out in the London Plan. The higher growth figures are dependent on significant infrastructure projects unlocking development sites and optimised housing delivery on comprehensively masterplanned site allocations. Supply will be measured through a stepped trajectory, based on the lower range housing target of 45,611, with a different target for every phase of the Plan.

3.179 The stepped trajectory shows a significant amount of Newham's housing target will be delivered in the long term phase of the plan. This is because a large proportion of housing delivery numbers will be on large, complex site allocations, many of which require associated infrastructure delivery to facilitate high density housing development. A breakdown of expected delivery from different sources over the course of the plan period is provided below:

- Allocations: 42,136
- Small sites: 5,700
- Windfalls: 3,328
- Permissions and resolutions to grant on sites not allocated in the Plan: 2,790
- Total: 53,954

3.180 However, it is acknowledged that many sites may be delivered more quickly than the housing trajectory projects. Indeed, a number of the largest of the borough's site allocations are located on land owned by the Greater London Authority, with many of these sites anticipated to be subject to strategic level investment to optimise housing delivery aligned with London's housing needs.

3.181 In order to meet the borough's ambitious housing target, developments will need to optimise the delivery of homes on site allocations, small sites and other large windfall sites using the design-led approach set out in both local and regional policy. Applicants will need to ensure that housing has access to adequate supporting infrastructure, such as public transport, healthcare, education and utilities, as well as local facilities such as retail, social infrastructure, open spaces and parks. Innovative methods of housing delivery, such as self-build, custom housebuilding and community-led housing developments will also be supported where these make optimal use of a site.

Implementation

H1.1	Part 1 sets out Newham's housing target and sites where the principle of delivering new homes will be supported. The majority of new housing development delivered over the plan period will be on site allocations. More information on site allocations can be found within the Neighbourhoods section of the Local Plan. Outside of designations (including but not limited to Strategic Industrial Land, Local Industrial Land, Metropolitan Open Land and Green Belt) or land uses with policy protections (for example, ground floor commercial, business and service uses in primary shopping areas, green spaces or social infrastructure) delivery of housing will be supported in principle. Small sites will form a part of Newham's housing delivery. Developments should seek to optimise housing delivery on small sites below 0.25 hectares in size, following the design-led approach and using the small sites typologies set out in the Newham Characterisation Study (2024). Over the course of the Plan period, Newham will aim to deliver 3,800 homes on sites of this scale, as set out in Policy H2 of the London Plan 2021.

H1.1	Net non-self-contained accommodation for students, net non-self-contained accommodation for older people (C2 Use Class) and all other net non-self-contained communal accommodation should count towards meeting housing targets based on the ratios set out within relevant Local Plan policies or the London Plan (whichever contains the most up-to-date ratio).
H1.2	Expectations for following the design-led approach are set out in policies D3 of the Local Plan and D3 of the London Plan 2021. In some circumstances, certain uses or buildings within a site boundary will need to be protected or re-provided. In these cases, applicants should consider relevant policy requirements set out within the Design, High Streets, Social Infrastructure, Inclusive Economy, Green and Water Spaces, Transport and Waste and Utilities chapters of the Local Plan. Where a development falls within a site allocation (see Neighbourhoods section), infrastructure requirements and development principles set out what infrastructure and uses need to be provided within a site. Applicants should also consider the requirements of Policy BFN4, which seeks to ensure that developments contribute to delivering necessary infrastructure where needed. Applicants for new housing developments should set out through supporting documents how housing densities respond to local context and character (using the guidance and analysis set out in the Newham Characterisation Study (2024)), environmental constraints and are appropriate in relation to the availability of supporting infrastructure including open space, transport, retail, social infrastructure, health, utilities and other supporting facilities. A development containing housing will not be supported if a proposal fails to optimise the housing delivery potential of the site in line with the design-led approach and relevant policies of the development plan.
H1.3	Developments on sites with a recent consent for general needs housing or part-housing development are expected to propose general needs housing as part of their submission. Where a development looks to deliver specialist housing in place of a previous consent for general needs housing, robust evidence should be supplied as to both the need for the proposed specialist housing (in accordance with the requirements of Policy H6) and why the loss of the permitted general needs housing would not compromise Newham's ability to meet its most pressing housing needs, including for three-bedroom homes and genuinely affordable housing. Assessments of such proposals should take into consideration the Council's latest Strategic Housing Market Assessment.
H1.4	Developments delivering community-led housing, self-build or custom build housing will be supported in principle where they are considered to optimise the capacity of housing delivery on a site. These developments will be assessed in accordance with the requirements of the design-led approach, as set out in policies D3 of the Local Plan and D3 of the London Plan 2021. They are also expected to meet the requirements of policies H3 and H4, alongside other relevant requirements of Local Plan policies.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Site Allocation and Housing Trajectory Methodology, LB Newham (2024)

Policy Links

Local Plan:

- BFN4: Developer contributions
- H2: Protecting and improving existing housing
- H3: Affordable housing
- H4: Housing mix
- D3: Design-led residential site capacity optimisation
- Section 4: Neighbourhoods

London Plan 2021:

- D3: Optimising site capacity through the design-led approach
- H1: Increasing housing supply
- H2: Small Sites
- H4: Delivering affordable housing



Policy H2: Protecting and improving existing housing

1. All residential housing will be protected unless replaced with at least an equivalent level of overall residential floorspace. The following criteria should be met, where relevant:
    a. developments that result in the conversion or demolition of affordable housing should not be permitted unless replaced by an equivalent level of affordable housing floorspace. Affordable housing that is replacing social rent housing floorspace should be re-provided as social rent floorspace.
    b. any loss of specialist and supported housing floorspace, including specialist housing for older people, should meet the release criteria set out in H6 part 1.
    c. the subdivision or conversion of family dwellinghouses (C3) with three or more bedrooms will only be permitted in exceptional circumstances where proposals comply with the requirements of either parts 2 or 3 or 4 below.

2. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to dwellinghouses will be permitted where proposals:
    a. re-provide a high-quality family dwellinghouse (C3) with three or more bedrooms; and
    b. provide a new additional high-quality dwellinghouse (C3) at a minimum size of a one bedroom, two-person dwelling house (C3).

3. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to dwellinghouses or a house in multiple occupation will be permitted where proposals:
    a. are located in a town or local centre, or along those sections of major roads within 400 metres of town or local centres; and
    b. are located above an existing, occupied main town centre or social infrastructure use; and
    c. do not have access to external private amenity space; and/or
    d. have poorly defined entrances.

4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as:
    a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or
    b. a house in multiple occupation for the sole use by Newham Council for people who are owed a homelessness duty or single homeless people; and

the following locational criteria would also need to be met:

    c. where the housing being provided is a large house in multiple occupation (sui generis), the accommodation should be located in town and local centres or along major roads well connected by public transport (with a minimum Public Transport Accessibility Level of 4).

Justification

3.182 The scale of Newham's housing target means that alongside new housing delivery it is necessary to protect existing housing floorspace, and in particular, affordable floorspace. Newham's Strategic Housing Market Assessment sets out that if we are to meet Newham and London's housing need as we deliver the Greater London Authority's housing target, almost 60 per cent of new homes need to be family-sized homes with three or more bedrooms. Therefore, to reduce pressure on overall housing delivery, the policy protects existing family-sized housing from conversion to houses in multiple occupation or subdivision to flats.

3.183 Despite the pressure to protect and provide more family-sized housing, the policy does recognise that there may be circumstances where subdivision or conversion of existing family dwellinghouses may be acceptable. The exceptions allowed by the policy are circumstances where existing family housing may not be suitably accessed, where resulting housing will be of a higher quality or where conversion is meeting the housing needs of homeless people or care leavers. In recent years, Newham has consistently had the highest rates of homeless households in temporary accommodation in the country.[33]

3.184 The affordability of privately rented housing is a key challenge, recognising homelessness affects many young single people, under the age of 35, who are subject to the shared accommodation rate for housing benefit. The supply of new houses in multiple occupation being granted planning permission is also limited given the acute identified need to protect family housing in Newham. This can lead to people either having to be placed in housing outside the borough or remaining in interim temporary accommodation for an extended period. Data from November 2021 suggests that just under 45 per cent of single people (of all ages) placed in temporary accommodation had been living in their accommodation for over three years. Care leavers also face similar challenges with regards to the affordability and availability of suitable housing upon leaving the care system, with there being a shortage of available standalone and shared accommodation.[34] Accordingly, Policy H2 looks to address these challenges by providing exceptional circumstances where the provision of houses in multiple occupation that meet the specific needs of these groups will be supported.

Implementation

H2.1	The Policy measures housing floorspace in terms of the overall floorspace within a building, rather than individual homes. For example, a building containing two one bedroom flats of 50m^2 each could be replaced with a three bedroom house with a minimum floorspace of 100m^2. Where housing floorspace is being replaced, new floorspace should provide a bedroom size mix that meets Newham's housing need, informed through the Council's latest Strategic Housing Market Assessment and the existing provision of affordable and family homes within a site. Considering these factors will help the Authority to meet its most pressing housing needs for both affordable and family-sized housing. Given recent evidence of housing needs in Newham, we do not consider there is a need to specifically protect purpose-built student accommodation floorspace, houses in multiple occupation or large-scale purpose-built shared living floorspace from redevelopment.

[33] GOV.UK Homelessness Statistics
[34] London Borough of Newham Sufficiency Strategy (2019-2022)

H2.1	However, where such uses are proposed to be lost, they should be replaced with an overall equivalent level of housing floorspace in line with the requirements of part 1 of Policy H2. For the purposes of part H2 part 1.c, developments that propose the loss of family-sized housing (or an existing unit readily capable of being used as family-sized dwelling by meeting the minimum internal space standard for a three bed, four person unit, in the London Plan 2021) will be refused unless meeting one of the exceptions set out in parts 3 – 5 of the policy. These exceptions acknowledge that in some circumstances, subdivision or conversion of family housing can have multiple benefits or more desirable outcomes.
H2.2	The policy allows for sub-divisions that retain a family-sized dwellinghouse (three or more bedrooms) and provide a new dwellinghouse. High-quality housing is considered to be a home that meets the relevant design requirements of Policy H11. This includes both internal design requirements and the provision of high-quality, external private amenity space for each home. In many parts of Newham first floor balconies will not be considered acceptable or to deliver high-quality amenity provision, given significant overlooking implications for neighbouring gardens or environmental constraints, for example excessive traffic noise.
H2.3	The policy allows for the subdivision of family housing to flats, or the conversion of family housing to other forms of housing, such as smaller dwellinghouses or houses in multiple occupation. For the purposes of H2 part 3.a, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough. The 400m distance will be measured as the crow flies from the closest boundary of the local centre to the site.

H2.3	For the purposes of H2 part 3.d, poorly defined entrances are those which are not easily understood as being an entrance to a home and/or those which are not located in plain sight. This could include, but is not limited to, entrances that are accessed from alleyways or servicing roads to the rear of a town centre property or poorly lit spaces. Where practicable all approach routes to new homes created through this policy should be step free.
H2.4	This policy sets out an exception to allow for the conversion of family homes to houses in multiple occupation where housing is for the sole use by Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by Newham Council. Accommodation placements for these groups should be made directly by the London Borough of Newham, with the definition of 'Newham Care Leavers' set out in the Local Plan glossary. The policy requirement should be secured either via a time-limited planning permission or through a section 106 agreement. The mechanism for securing the permission will be directed by the case officer for the application. Care leavers accommodation provided through this exception should be for up to six sharers. Accommodation for single homeless people in Newham or people owed a homelessness duty by Newham Council can either be designed as a house in multiple occupation (up to six sharers) or as a large house in multiple occupation (between seven and ten sharers). Conversions under this part are expected to meet the requirements of Policy H6 and Policy H9, including requirements for residential management plans and agreed rent levels. Proposals should also meet the relevant housing quality requirements of Policy H11 (see Table 13).

H2.4	To meet the requirements of this policy, the use of the housing specifically for Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by the London Borough of Newham should be included in the description for the planning permission, alongside the temporary period the planning permission is sought for. Applicants, as part of their planning submission, should provide evidence of discussions with Newham's relevant commissioning service(s), which show the length of time the accommodation will be required for. This will inform the length of time the temporary consent is granted for. Temporary periods for the use should be five years or fewer, and should have regard to the policy provisions for meanwhile uses set out in policy BFN1.8. Before submitting a planning application, Newham's relevant commissioning service(s) should be contacted by the applicant in order to confirm that the accommodation provision is appropriate and to confirm the rents proposed would be suitable (thereby demonstrating compliance with H9 part 2). This evidence should be submitted alongside the planning application. The Council's relevant commissioning service(s) will also be consulted as part of the application process, to confirm these details are correct. On the expiration of the temporary period secured through the planning permission, the accommodation should be reverted back to its lawful use as a single family dwellinghouse and any facilitating works removed. Where residents are eligible for support under the Care Act 2014, these needs should be met via supported and specialist accommodation, and will be considered under Local Plan Policy H6 rather than this policy.
H2.4	Given the evolving picture of need for these forms of accommodation, if Newham's relevant commissioning service state that these forms of accommodation are no longer needed, planning permission will not be granted for the change of use under this exception clause. For the purposes of H2 part 4.c, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)

Policy Links

Local Plan:

- H1: Meeting housing needs
- H6: Supported and specialist housing
- H9: Houses in multiple occupation and large-scale purpose-built shared living
- H11: Housing design quality

London Plan 2021:

- H8 Loss of existing housing and estate redevelopment

Policy H3: Affordable housing

1. Newham's strategic target is for 50 per cent of all new homes delivered across the Plan period to be affordable housing. New residential developments on individual sites with the capacity for ten units or more should provide:
    a. affordable housing in accordance with the London Plan; and
    b. an affordable housing tenure mix of 65 per cent social rent housing and 35 per cent intermediate homes.

   Developments that do not provide affordable housing in accordance with these policy requirements and family dwellinghouses (C3) in accordance with Local Plan policy H4 part 2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

2. New residential developments with the capacity to deliver ten dwellinghouses (C3) or more should provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable due to site conditions or the scale of the site, the applicant should:

    a. prioritise off site provision of affordable housing with the equivalent quantity, tenure and size mix required under part 1; or
    b. where off site provision of affordable housing is not deliverable, a payment in lieu of affordable housing may be accepted. The payment in lieu should result in the ability to secure a higher level of affordable housing provision than the 50 per cent strategic target sought by part 1 above; and
    c. where applicants are proposing to not meet the requirements of parts 2.a or 2.b, this will not be supported unless an application is accompanied by a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered.

3. New residential developments which seek to provide additional residential units through the extension of an existing development on the same or an adjoining site (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), will be assessed against the requirements of Local Plan Policy H3 based on the combined number of residential units of both the existing site and the proposed new residential units.

Planning Obligations

- Affordable housing delivery proposed by an application will be secured in perpetuity via a development's legal agreement. The legal agreement will also secure relevant review mechanisms, as per the requirements of Policy BFN4.
- A development's legal agreement may include a cascade clause where only a small number of affordable housing units can be delivered on site. In these circumstances, the development's legal agreement will require the delivery of affordable homes on-site. However, if the applicant is unable to secure a registered provider for the on-site units, the cascade clause would allow for the provision of off-site delivery or a payment in lieu of affordable housing. Applicants will need to demonstrate that best endeavours have been used to secure a registered provider, both at application stage and when it comes to discharging the relevant legal agreement obligation.

Justification

3.185 Policy H3 sets out Newham's expectations for affordable housing delivery, recognising the pressing need to deliver genuinely affordable homes to meet both Newham and London's wider housing needs. In particular, Newham residents need access to more social rent homes. The Newham Strategic Housing Market Assessment (SHMA) sets out that 54 per cent of housing need across the plan period is for affordable homes, with 66 per cent of this need being for social rent homes. This is due to the multiple, and often overlapping, housing issues our residents face. In recent years, wage rises have not kept pace with the significant increases in house prices and rents in the borough. Around 50 per cent of Newham's residents currently live in poverty when housing costs are taken into consideration, a situation that may worsen if cost of living increases continue along current trends. Furthermore, Newham has continuously had one of the largest housing registers in the country as well as the largest number of people in temporary accommodation.[35] The 2021 census also showed that 25% per cent of households in Newham are living in over-crowded conditions, the highest level of overcrowding in London.

3.186 Accordingly, Policy H3 seeks to address the significant affordability challenges our residents face by setting overall affordable housing and tenure mix targets, that developments are expected to meet on site. Newham's strategic target seeks to deliver 50 per cent of all new homes delivered across the plan period as affordable housing. This will be delivered through various strategies, including significant areas of land in public ownership where the delivery of genuinely affordable housing will be prioritised, delivering Newham's estate regeneration and affordable homes programmes and through delivering affordable housing on all sites of 10 or more residential units. The prioritisation of social rent dwellings will also make sure we are addressing the needs of our residents, as these homes will only be available to people on Newham's housing waiting list. The policy does allow for provision of affordable housing off site or payment in lieu of affordable housing in limited circumstances where delivery on site is unfeasible. However, the stability of affordable housing as an asset means that delivering genuinely affordable homes forms a key foundation of the borough's housing delivery, particularly in a context of economic uncertainty.

Implementation

H3.1	Developments are expected to provide affordable housing in accordance with the requirements of part 1 of the policy. At the time of the Local Plan's adoption, the relevant London Plan affordable housing requirement is set out through Policy H5 (Threshold approach to applications) in the London Plan (2021).
H3.1	Genuinely affordable housing should be included within the initial buildings or phases of developments and should not be concentrated in the final buildings or phases. To meet our affordable housing target, genuinely affordable housing delivery should be maximised on publicly owned sites, developments brought forward by registered providers, and sites where the loss of employment floorspace or social infrastructure is deemed acceptable as per London Plan (2021) Policy E7, Local Plan Policy J3 and/or Policy SI2. While the borough's affordable housing targets seek to deliver 50 per cent affordable housing overall, the policy supports the delivery of 100 per cent affordable housing developments, recognising the significant contribution such developments can make to strategic affordable housing delivery across the borough. Developments delivering above 50 per cent affordable housing should still seek to meet the tenure mix requirements of part 1 of the policy as a minimum (65% of the total affordable units being social rent). Affordable homes delivered above the requirements of part 1 may be delivered as intermediate homes.

[35] GOV.UK Local Authority Housing Data; GOV.UK Homelessness Statistics.

H3.1	Developments are not required to submit a viability assessment where they meet the relevant affordable housing target and tenure mix requirement set out in part 1, and provide a policy compliant level of family housing as per Policy H4 part 2. Developments that do not meet these requirements should be justified and submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus approach. The financial viability assessment should robustly demonstrate that policy compliance is not viable but that the scheme is providing the maximum viable contribution towards the delivery of genuinely affordable housing. The viability assessment will be independently assessed. These developments will also be subject to review mechanisms as set out in Local Plan Policy BFN4. Where sites are unable to deliver on site affordable homes, officers also will closely scrutinise a development's proposed size mix. Where a higher proportion of family-sized homes are proposed, this may help to justify the under-provision of affordable housing.
H3.2	The policy sets an expectation that affordable housing provision should be delivered on site. However, part two of the policy recognises that there may be circumstances where off-site provision or payment in lieu of affordable housing may be necessary. The policy sets out that payment in lieu should only be considered when on or off site provision of affordable housing is not deliverable. Viability challenges alone will not be considered a justification for delivering off site affordable housing or a payment in lieu of affordable housing. One example where the provision of off-site or in lieu contributions towards affordable housing delivery may be justified are small-scale developments where registered providers are unwilling take on a small number of affordable homes.

H3.2	Where this is the case, the applicant should provide evidence of discussions with Newham's Housing team and Registered Providers on Newham's list of accredited providers, demonstrating no interest in the offer. These discussions would need to be evidenced at application stage. In such cases, officers may require the development's legal agreement to still require the delivery of genuinely affordable homes on-site, reflecting that circumstances can change and the importance of onsite delivery wherever possible. However, the section 106 would also include a cascade clause allowing for the provision of off-site delivery or a payment in lieu of genuinely affordable housing if on-site provision continues to be unfeasible. If, following the granting of planning permission a developer can provide evidence to demonstrate that 'best endeavours' have been used to secure a registered provider (in line with the evidence requested at application stage), but they have still been unable to do so, they would be able to provide offsite delivery, or, in exceptional circumstances, a payment in lieu. If off-site delivery is proposed, this would need to have planning permission secured and have commenced before the occupation of the original scheme which has secured off-site delivery through the cascade clause. Developments proposing off-site provision or a payment in lieu that do not meet the requirements of part 2.a or part 2.b, will be required to submit a detailed financial viability assessment. An application submission should provide clear and convincing justification and evidence that the provision of genuinely affordable housing on site is unfeasible and that homes are unlikely to be taken up. The financial viability assessment should robustly demonstrate that policy compliance is not viable but that the scheme is providing the maximum viable contribution towards the delivery of affordable housing.

H3.3	This requirement will apply to developments that seek to deliver an upwards or side extension to an existing block of housing, which results in additional units being delivered on the site. The reliance of developments on an existing building will be assessed through reviewing the overlap of site layouts, access, shared cores or entranceways and facilities. Where one site is judged to be reliant on the other to function or meet policy requirements or standards, affordable housing will be required based on the combined number of homes of the existing site and the new homes proposed through the development.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Local Plan Viability Assessment, BNP Paribas (2024)

Policy Links

Local Plan:

- BFN4: Developer contributions
- SI2: New and re-provided community facilities and health facilities
- J3: Protecting employment floorspace
- H1: Meeting housing needs
- H4: Housing mix
- H5: Build to rent housing
- H7: Specialist housing for older people
- H8: Purpose built student accommodation
- H9: Houses in multiple occupation and large-scale purpose-built shared living

London Plan 2021:

- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H10 Housing size mix
- H11 Build to rent
- H13 Specialist older persons housing
- H15 Purpose-built student accommodation
- H16 Large-Scale purpose-built shared living
- E7 Industrial intensification, co-location and substitution



Policy H4: Housing mix

1. All new residential developments should deliver a mix and balance of residential types and sizes. The appropriate mix of residential sizes, types and tenures will be determined through:
    a. the need to secure mixed and inclusive communities; and
    b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment and in the Gypsy and Traveller Accommodation Assessment; and
    c. development viability; and
    d. the existing and pipeline mix of residential units in the area; and
    e. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten dwellinghouses (C3).

2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new social rent homes as family dwellinghouses (C3) with three or more bedrooms. Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3 part 1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

3. New residential developments on site allocations should provide a minimum of 15 per cent of the proposed social rent homes as four or more bed family dwellinghouses (C3).

4. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or one-bedroom, one person dwellinghouses (C3).

5. In exceptional circumstances, a portfolio approach to the delivery of affordable housing and/or family dwellinghouses (C3) may be accepted, subject to developments not resulting in an unacceptable impact on the mix and balance of residential types and sizes in an area. Developments within a portfolio delivering additional affordable housing and/or family dwellinghouses (C3) should be located in Newham, and completed and ready for occupation prior to the developments within the portfolio that deliver affordable housing and/or family dwellinghouses (C3) below the policy target set out in H3 part 1 and H4 part 2.

Justification

3.187 Policy H4 requires the delivery of a mix of housing types, sizes and tenures to help meet Newham's housing needs. Newham's latest evidence of housing needs suggests that around 60 per cent of Newham's housing need is for family-sized homes (three beds or larger). Two bedroom homes form a much smaller proportion of our housing need (just under 30 per cent) while one bedroom homes form a small proportion of need (around 12 per cent). Accordingly, the policy sets minimum targets for the provision of both social rent family-sized homes within major development proposals and four-bedroom homes on site allocations. The lower minimum percentage requirements are reflective of Newham's latest viability evidence. Setting a minimum target for social rent three bed or larger homes will help address the acute need for the provision of family homes within Newham, while a minimum four-bedroom target for social rent homes on site allocations will help to encourage multigenerational living, re-provide larger family homes through regeneration projects and help address the needs of overcrowded families living in temporary accommodation. The policy also sets an expectation that no more than a very small proportion of studio or one-bedroom, one person dwellinghouses will be supported on new major housing developments, as their size tends to lack sufficient flexibility to meet people's changing needs over the course of their lifetime.

Implementation

H4.1	Part 1 of the policy sets out the criteria that a development's housing mix will be assessed against. All developments with the capacity to deliver ten dwellinghouses or more will be expected to meet the criteria of parts 2 and 4 of the policy (and part 3 for developments on site allocations), but the policy does allow some flexibility to consider various factors that may influence a development's housing mix. These include Newham's most up to date evidence of housing needs (the Strategic Housing Market, which shows a significant need for social rent homes and which will be reviewed and updated if necessary), any financial viability assessment submitted alongside an application and an individual site's context. Sites are expected to prioritise the delivery of family-sized homes as part of their housing mix, before determining the respective mix of two-bed and one-bed provision aligned with identified need. In terms of development design, different housing types should be evenly distributed across proposals and within buildings, giving real choice of floor level, aspect and orientation to residents. Although sites delivering below ten dwellings are not required to meet the requirements of parts 2 and 4 of the policy, developments for sites of this scale are expected to provide a mix of housing that includes family-sized housing, recognising this is one of Newham's most pressing housing needs. Failure to provide a genuine mix of housing sizes through minor or major scale developments may result in a refusal of an application.
H4.2	Part 2 of the policy sets out expectations for the delivery of three or more bedroom social rent homes within a housing development. This requirement applies to any development delivering dwellinghouses, including general needs housing, age-restricted general needs housing and Build to Rent housing.

H4.2	For Build to rent homes this requirement will also apply to the affordable homes rented at equivalent rents to Social Rent. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. New housing developments on individual sites with the capacity to deliver ten residential dwellings or more that provide less than 40 per cent of the new social rent homes within a development as three bed or larger homes will be required to submit a financial viability assessment demonstrating that the maximum viable mix will be delivered. This viability assessment should use a Benchmark Land Value that uses an Existing Use Value plus premium approach. This financial viability assessment should also cover affordable housing delivery where the scheme does not achieve policy compliant levels as per the requirements of Policy H3 part 1 concerning overall affordable housing delivery and tenure mix. The financial viability assessment will be independently assessed. Where a development does not achieve a policy compliant level of family or affordable housing, the Council will consider the overall housing mix being provided within a development to decide any necessary trade-offs between affordable and family housing delivery.

H4.3	Developments on site allocations (identified in the Neighbourhoods section of the Local Plan) should aim to deliver a minimum of 15 per cent of proposed social rent homes as four or more bedroom dwellinghouses. This 15 per cent counts towards the overall 40 per cent social rent family housing target sought under part 2 of the policy, and the affordable housing targets sought under policy H3. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis.
H4.4	Part 4 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
H4.5	It is recognised that in some instances, for example public sector developers bringing forward a range of small scale major housing developments, viability constraints may preclude the delivery of affordable and/or family dwellinghouse targets in some locations. Accordingly, the policy allows for the delivery of a portfolio approach in exceptional circumstances to address this issue. Developers will need to demonstrate that such an approach would not have an unacceptable impact on the mix and balance of residential types and sizes in an area, for example a much smaller proportion of family or genuinely affordable homes being delivered in one neighbourhood compared to another within the portfolio of developments. The justification for such an approach should be set out within an application's supporting documentation.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Local Plan Viability Assessment, BNP Paribas (2024)

Policy Links

Local Plan:

- H1: Meeting housing needs
- H3: Affordable housing

London Plan 2021:

- H4: Delivering affordable housing
- H10: Housing size mix



Policy H5: Build to Rent housing

1. To qualify as a Build to Rent development the following criteria should be met:
    a. the development or block or phase within the development should operate under unified ownership and management, within blocks or phases of at least 50 dwellinghouses (C3); and
    b. all the dwellinghouses (C3) are self-contained and let separately; and
    c. the dwellinghouses (C3) should be held as Build to Rent under a covenant for at least 15-years; and
    d. a clawback mechanism is in place that ensures there is no financial incentive to break the covenant; and
    e. the development, block or phase within the development should offer long term tenancies for private renters for a minimum of three years with a six-month break clause in favour of the tenant; and
    f. providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance; and
    g. structured and limited in-tenancy rent and service charge increases should be made clear to the tenant in advance of the tenancy agreement signature, including any annual increases which should always be formula-linked; and
    h. there is on-site management; and
    i. providers have a complaints procedure in place and are a member of a recognised ombudsman scheme.

2. Developments of Build to Rent housing as a block or phase within a larger development including build for sale housing are expected to deliver affordable housing that meets the requirements of Local Plan Policy H3.

3. Developments of Build to Rent housing as the sole C3 residential tenure should provide affordable homes in accordance with the London Plan. Affordable Build to Rent homes should provide 65 per cent of new affordable homes rented at equivalent rents to Social Rent and 35 per cent of new affordable homes rented at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.

4. Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4 part 2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Developments of Build to Rent housing that are required to submit a detailed financial viability assessment should submit dual viability assessments that incorporate viability testing that set outs outcomes in relation to 'Build for Rent' and 'Build for Sale' approaches and the subsequent impact upon the delivery of affordable housing.

Planning Obligations

- Developments for Build to Rent will be subject to a 15-year covenant and a clawback mechanism secured through a development's legal agreement.
- Affordable housing delivery proposed by an application will be secured in perpetuity via a development's legal agreement. The legal agreement will also secure relevant review mechanisms, as per the requirements of Policy BFN4.



Justification

3.188 Build to Rent housing is purpose-built housing that is designed for rent rather than sale. It is distinct from shared rented accommodation such as houses in multiple occupation or large-scale purpose-built shared living. Recent years have seen a significant growth in the role of the private rented sector, as a result of changes to letting polices and pressures on the housing stock that have made it less likely that young single persons will be allocated a one-bedroom social rent or affordable rented property. Latest evidence suggests there are roughly 50,000 private rented sector properties in the borough, with private renting particularly prevalent in people from white, non-British ethnic backgrounds and from Asian Indian backgrounds. Recognising its growing role in the housing market, Policy H5 looks to set quality standards for Build to Rent housing and requires the delivery of affordable housing. Affordable housing policy requirements for the policy have been formulated using Newham's latest evidence of housing need. Therefore, this policy broadly reflects the affordable housing tenure mix requirements set out in Policy H3 for build for sale general needs housing developments. Unlike build for sale homes, Build to Rent properties are not subject to market 'absorption rates' (the rate developers will release homes onto the market to prevent price falls), meaning that the delivery of high-quality and affordable Build to Rent housing can help to accelerate housing delivery within the borough.

Implementation

H5.1	Developments that do not meet the requirements of part 1 of the policy will not qualify as Build to Rent housing and will be considered as Build for Sale developments with respect to the delivery of affordable housing. A valuation of the market and affordable homes should be included within a development's legal agreement. This will allow for the calculation of the clawback level if the covenant, required under H5 part 1.c, is broken.
H5.2	Developments that deliver Build to Rent blocks or phases in larger developments that also deliver build for sale housing will be required to meet affordable housing requirements set out in Policy H3 part 1. Affordable homes should be delivered on site in the build for sale housing element of the scheme.
H5.3	Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole C3 housing tenure within a development. At the time of the Local Plan's adoption, the relevant London Plan affordable housing requirement requires Build to Rent housing to provide at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses. Alongside this requirement, affordable Build to Rent homes should provide 65 per cent of new affordable homes rented at equivalent rents to Social Rent and 35 per cent of new affordable homes rented at equivalent rents to London Living Rent. The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
H5.4	Developments that fail to provide affordable housing in line with the requirements of parts 2 and 3 of the policy and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4 part 2 will be required to provide a detailed financial viability assessment, with a Benchmark Land Value that uses an Existing Use Value plus premium approach. The financial viability assessment should robustly demonstrate that policy compliance is not viable but that the scheme is providing the maximum viable mix of family and affordable homes. The viability assessment will be independently assessed. These developments will also be subject to review mechanisms as set out in Local Plan Policy BFN4.

H5.4	Developments delivering Build to Rent housing, either as the only housing tenure on site or as an element of a broader development, should detail within their financial viability assessment the different outcomes of delivering built to rent homes against delivering build for sale homes. If a greater level of genuinely affordable housing delivery is possible through a build for sale scheme then permission may be refused.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Local Plan Viability Assessment, BNP Paribas (2024)

Policy Links

Local Plan:

- BFN4: Developer contributions
- H3: Affordable housing
- H4: Housing mix
- H11: Housing design quality

London Plan 2021:

- H4 Delivering affordable housing
- H6 Affordable housing tenure
- H10 Housing size mix
- H11 Build to Rent



Policy H6: Supported and specialist housing

1. Specialist housing provision for vulnerable people will be protected, unless it can be demonstrated that one of the following criteria are met:
    a. the needs of current residents, or potential residents (where the facility is not currently in use) can be met by new on or off-site replacement specialist housing or an existing Newham-based specialist housing site; or
    b. relevant London Borough of Newham commissioning teams consider the existing provision to be low quality; or
    c. the housing has been offered to, or is operated by relevant London Borough of Newham commissioning teams, and these commissioning teams consider the existing housing provision is not needed locally.

2. New or expanded supported or specialist housing developments will be supported where:
    a. they deliver high-quality housing; and
    b. they are provided in appropriate locations; and
    c. the local need for the facility has been clearly evidenced.

3. New specialist or supported housing for people with care needs should meet current and/or projected local needs, determined through having regard to the Council's or other relevant public sector bodies' strategies and evidenced through early engagement with relevant London Borough of Newham commissioning teams.

4. New specialist or supported housing for people with care needs, with the exception of sheltered housing for older people, should ensure residents from outside of Newham should not comprise more than 33 per cent of the total residents.

5. Developments for specialist housing should include a detailed and resourced residential management plan.

Justification

3.189 Policy H6 seeks to meet the housing needs of different groups who may require specialist or supported housing, including people with learning disabilities or autism, care experienced children, care leavers and homeless people. The policy seeks to protect and deliver high-quality housing that meets needs and are in locations that are well-connected, that meet the safeguarding needs of residents and have access to adequate supporting facilities. Information from Newham's Adult Social Care team shows that people who need specialist or supported housing are currently housed outside the borough given a lack of available Newham-based housing. The Authority's latest evidence of housing needs also suggests that there are a significant number of people in Newham's population who may need a form of supported housing, due to factors such as age, disabilities, mental health issues, autism, drug and alcohol misuse, domestic abuse or homelessness. However, the evidence makes clear that the number of people identified within the population with a support need may not necessarily require specialist housing, recognising that many people may not be eligible for housing or will have an individual preference to receive care and support in their existing home. Accordingly, developments should be assessed having regard to both the locational suitability of housing, as well as the need for different types of housing.

Implementation

ALL	Specialist and supported housing is housing that incorporates support for a particular and/or vulnerable group. Individuals may live in supported housing for the long term or for shorter periods until they are ready to move on. These forms of housing vary in the level of support provided, although they are likely to include some communal facilities for residents. Typically, housing will be residential institutions (C2), but some provision may be considered sui generis or a dwellinghouse (C3).
H6.1	Part 1 of the policy outlines the set of circumstances under which developments may seek to convert, redevelop or remove specialist or supported housing. Developments seeking to meet the criteria of H6 part 1.a should show that sufficient housing is or will be available to meet the housing needs of residents who are using or would have utilised the facility to be lost. Housing should have sufficient capacity to meet the needs of existing or potential occupants of the facility to be lost at the point of decommissioning the existing housing, and should be available at the equivalent rent and care costs. The suitability of the replacement housing's location should be discussed with relevant London Borough of Newham commissioning teams to ensure its location is appropriate for the type of housing being provided and the needs of residents are fully considered (for example, they have convenient access to supporting facilities or are at an appropriate distance to a town or local centre and public transport connections). Part 1.b of the policy sets out that housing can be lost where relevant London Borough of Newham commissioning teams consider the existing provision to be low quality. Evidence of discussions with relevant London Borough of Newham commissioning teams should be submitted alongside an application.
H6.1	Alternatively, existing specialist or supported housing can be lost to other uses where relevant London Borough of Newham commissioning teams consider the existing housing provision is not needed locally. Applicants should evidence that they have drawn the relevant commissioning team's attention to the housing and that commissioning teams are in agreement that the housing provision is no longer required. Evidence of discussions with relevant London Borough of Newham commissioning teams should be submitted alongside an application, as well as reference to the Market Position Statements published by the relevant commissioning team. If provision is considered to be of suitable quality for occupation or is considered to be a locally needed type of housing, housing should not be lost to other uses and applicants should work with relevant London Borough of Newham commissioning teams to secure a provider for the housing. Alternatively, applicants should find sufficient capacity to meet the needs of existing or potential residents under the requirements of H6 part 1.a.
H6.2	Part 2 of the policy sets out the strategic principles that all developments for specialist housing will be assessed against, including all newly proposed housing and extensions to existing facilities increasing the intensity of use. To provide high-quality housing, developments should show, through their application drawings and supporting documents, how the proposed housing meets relevant quality standards set out within Policy H11. Applicants should also demonstrate engagement with relevant commissioning teams around the quality of housing, including whether the size and number of units of housing, private rooms or bed spaces are suitable for the residents of the housing, meet their support needs and will help maintain their wellbeing over the long-term.

H6.2	Applicants may also wish to make reference to best practice guidance around the proposed size of housing for different support needs, and how this has shaped the design of the proposed housing. For example: • see Carehome.co.uk 'Size matters in care homes with small doing better than large, says CQC' (2017) for quality standards for nursing and residential care homes. • specialist housing development with more than six bed spaces or private rooms is unlikely to be suitable for people with a profound and multiple learning disability. However, accommodation larger than this could be considered suitable if agreed in consultation with relevant teams within the Council's commissioning services to ensure the quality of housing meets the needs of future residents. Specialist or supported housing should form part of a broader housing mix within an area and should be located so residents will have access to both good quality public transport links and supporting facilities. These could include specialist healthcare or social and leisure opportunities. Applicants should consider whether existing supporting facilities can accommodate increased usage as a result of new housing provision. Typically, specialist or supported housing should be directed to locations that are accessible to town and/or local centres and relevant supporting facilities. Accessibility to these locations should typically be a 5–10-minute walk (approximately 400-800m), recognising that some residents may travel more slowly or find travelling further distances more challenging. However, in some instances proximity to town centres may be inappropriate. This could be because of safeguarding risks or distancing from potential health triggers. Alternative locations should be justified through early engagement with relevant London Borough of Newham commissioning teams.

H6.2	Given the potential for increased safeguarding risks, developments providing housing under H2 part 4.a for Newham Care Leavers should submit a Location Risk Assessment as part of their residential management plan (required under H6 part 5). The need for housing should be set out within an application's supporting documentation. In most instances, facilities should meet a local need for housing and accord with the requirements of parts 3 and 4 of the policy.
H6.3	Local need for housing should be evidenced through having regard to the Council's or other relevant public sector bodies' strategies and through discussions with relevant internal commissioning teams. London Borough of Newham commissioning teams will be consulted on proposals for specialist housing, and will indicate whether the form and scale of housing is needed locally, as well as the quality of the proposed housing in accordance with H6 part 2.a.
H6.4	The proposed occupancy of specialist or supported housing should be set out within a proposal's residential management plan. If the proposed facility is new and not yet operational, the applicant should set out which local authorities or charities the provider will be working with to show that residents from outside of Newham will not comprise more than 33 per cent of the total residents of the accommodation. Developments for sheltered housing for older people are not required to meet this requirement.

H6.4	Exceptions to this requirement may also be supported where housing is helping Newham to deliver a strategic sub-regional partnership approach to housing provision or where safeguarding issues require placement of residents outside of their borough. The suitability of exceptions to this requirement should be determined through evidenced early engagement with relevant London Borough of Newham commissioning teams. Sub-regional approaches should also be identified within strategic papers (for example, agreed Cabinet decisions).
H6.5	Residential management plans should demonstrate the residential population mix and other management practices that minimise safeguarding risks, maximise opportunities to create and sustain social networks and access appropriate support, and ensure that the development minimises amenity impacts. Residential management plans should also include: details of numbers of staff on site and staff routines; how residents will be placed within the housing; the level of care provided; how resident independence would be sustained; expected comings and goings; how amenity impacts on surrounding residents will be minimised; safeguarding practices; health and safety procedures; and the maintenance of the housing and any communal spaces provided. Developments providing housing under H2 part 4.a for Newham Care Leavers should submit a Location Risk Assessment as part of their residential management plan.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)

Policy Links

Local Plan:

- H1: Meeting housing needs
- H7: Specialist housing for older people
- H11: Housing design quality

London Plan 2021:

- H3: Meanwhile use as housing
- H12: Supported and specialised accommodation
- H13: Specialist older persons housing



Policy H7: Specialist housing for older people

1. Developments that deliver specialist housing for older people will be supported where they:
    a. meet the relevant requirements of Local Plan Policy H6; and
    b. with the exception of care home accommodation, are located in town centres or within 400 metres of a local centre or 800 metres of a town centre, unless specific care needs and/or vulnerabilities justify an alternative location. Alternative locations should be determined through evidenced early engagement with relevant London Borough of Newham commissioning teams; and
    c. with the exception of care home accommodation, deliver affordable housing in accordance with Local Plan Policy H3.

2. Developments that deliver specialist housing for older people are encouraged to provide small-scale social infrastructure or main town centre uses that allow for interaction between residents and the local community in suitable locations and where supported by London Borough of Newham commissioning teams.

Planning Obligations

- Affordable housing delivery proposed by an application will be secured in perpetuity via a development's legal agreement. The legal agreement will also secure relevant review mechanisms, as per the requirements of Policy BFN4.

Justification

3.190 Policy H7 supplements the requirements of Policy H6, encouraging the provision of specialist housing for older people where the housing meets need, is of a high-quality and is provided in locations with access to supporting facilities. The London Plan 2021 sets Newham council an annual benchmark to deliver 85 older persons housing units per annum between 2017 and 2029. However, Newham's Strategic Housing Market Assessment suggests there is emerging picture of demand for different types of older persons housing, with different types of housing experiencing varying levels of demand and assistive technology meaning that people could stay in their homes for longer. There is an increasing emphasis on designing homes for people to 'age in place', with people's desire to move being influenced by their personal circumstances.[36]

3.191 Evidence from Newham's commissioning teams demonstrate that while there is some limited need for sheltered housing in the borough, the majority of housing need for older persons is for extra-care and care home accommodation. More detailed analysis of Newham's need for housing for older people is set out in the 'Housing for older people Topic Paper' that supports the Local Plan. Newham faces challenges when finding housing placements for older residents, with the authority currently making comparatively low in-borough placements compared with other boroughs. This is due to Newham's relatively low rent costs and other boroughs' ability to outprice the host borough. Latest evidence suggests there is insufficient in-borough provision to meet our needs, particularly for people with complex needs or dementia.[37]

3.192 Older people within Newham also face challenges of housing affordability. Recent survey work undertaken as part of the Authority's Ageing Well Strategy (2022) suggests that around a fifth of residents surveyed aged over 50 found housing costs difficult to afford and 15 per cent very difficult to afford. Similarly, in 2019 37.3 per cent of Newham's residents aged 60 and over were living in poverty.[38] Accordingly, the policy seeks to address these issues, requiring that specialist housing for older people should provide genuinely affordable housing in line with the requirements of Policy H3 (with the exception of care home accommodation).



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[36] Manchester School of Architecture, Greater Manchester Combined Authority And Greater Manchester Ageing Hub 'Rightsizing: Reframing The Housing Offer For Older People' (2018)
[37] London Borough of Newham Aging Well Strategy (2022) [38] Office For Health Improvement And Disparities Productive Healthy Ageing Profile (2019)

Implementation

ALL	Specialist older people's housing typologies typically include: • Sheltered housing: self-contained housing designed for independent living with support available if required. • Extra care/assisted living: self-contained housing within a wider development with 24-hour care and support available. • Care home accommodation: personal care and accommodation provided on site as a single package and often regulated by the care quality commission. Further details of these typologies can be found on the Age UK website (AGE.UK Sheltered Housing (2022); AGE.UK Assisted Living And Extra-Care Housing (2022)) and within the London Plan 2021 Policy H13. For clarity, some developments deliver age-restricted general market housing, which is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services, and is therefore use class C3. These forms of housing are not considered to be supported or specialist housing (covered by policies H6 and H7) and are, therefore, expected to meet the relevant policy requirements applied to general needs housing, including affordable housing and housing mix requirements.
H7.1	For the purposes of H7 part 1.b, applicants will need to consider the requirements of Policy D6 (Neighbourliness) where a development is located in proximity to pollution sources, recognising the disproportionate impact these may have on older residents. The requirements of H7 part 1.c do not apply to care home accommodation. 'Care home accommodation' for the purposes of this policy is defined as having the following attributes, as per the London Plan 2021 definition:
H7.1	• personal care and accommodation are provided together as a package with no clear separation between the two; and • the person using the service cannot choose to receive personal care from another provider; and • people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold; and • likely Care Quality Commission-regulated activity will be 'accommodation for persons who require nursing or personal care'. The determination of whether a development is considered to provide care home accommodation will be considered on a case-by-case basis dependent on the nature of the accommodation being provided. This will be reviewed by London Borough of Newham commissioning teams based on relevant needs and capacity assessments. Developments that fail to provide affordable housing in line with the requirements of H7 part 1.c will be required to provide a detailed financial viability assessment. The financial viability assessment should robustly demonstrate that policy compliance is not viable but that the scheme is providing the maximum viable mix of genuinely affordable homes. This viability assessment should use a Benchmark Land Value that uses an Existing Use Value plus premium approach. The viability assessment will be independently assessed. These developments will also be subject to review mechanisms as set out in Local Plan Policy BFN4.
H7.2	The policy supports the provision of small-scale social infrastructure or main town centre uses in housing for older people where provision is considered appropriate by Newham's relevant commissioning teams and falls within locations where social infrastructure and/or main town centre uses would be supported (see policies HS1, HS3 and SI2). The scale of such facilities should be appropriate to the scale of the development and allow for use both by residents of the facility as well as members of the public.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)

Policy Links

Local Plan:

- BFN4: Developer contributions
- H3: Affordable housing
- H4: Housing mix
- H6: Supported and specialist housing
- H11: Housing design quality
- HS1: Newham's Town Centres Network
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services
- SI2: New and re-provided community facilities and health care facilities

London Plan 2021:

- H4 Delivering affordable housing
- H6 Affordable housing tenure
- H10 Housing size mix
- H12 Supported and specialised accommodation
- H13 Specialist older persons housing



Policy H8: Purpose-built student accommodation

1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:
    a. it is located within or adjacent to an existing or approved campus development in the neighbourhood; or
    b. it is solely providing a replacement facility.

2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:
    a. it is located within or adjacent to an existing or approved campus development in the borough; or
    b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4) and it will not create an over-concentration of purpose-built student accommodation; or
    c. it is solely providing a replacement facility.

3. New purpose-built student accommodation should provide affordable student accommodation in accordance with the London Plan. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

4. New purpose-built student accommodation should:
    a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or
    b. in areas of over-concentration, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and
    c. where purpose-built student accommodation is being delivered within or adjacent to an existing or approved campus development in the borough in accordance with H8 part 1.a or H8 part 2.a, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.

5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and exercise that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing or approved student campus-based facilities for studying and/or exercise that have sufficient capacity to meet any increased need.

6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

Planning Obligations

- Affordable housing delivery proposed by an application will be secured in perpetuity via a development's legal agreement. The legal agreement will also secure relevant review mechanisms, as per the requirements of Policy BFN4.
- A nominations agreement should be agreed between the applicant and a higher education provider or providers in accordance with the requirements of H8 part 4.



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Justification

3.193 Policy H8 seeks to support the delivery of purpose-built student accommodation, helping to ensure this accommodation provision contributes to neighbourhoods having a mix and balance of different housing types and sizes. In recent years, Newham has seen high levels of student accommodation permitted, particularly within Stratford and Maryland. As of January 2024, just over 3,600 bed spaces have been permitted or completed in this neighbourhood since the financial year 2019/20. This equates to around ten per cent of London's wider need for purpose built student accommodation, completed or permitted in only three years of the London Plan's (2021) ten year plan period. Conversely, the Authority's housing needs evidence suggests that the borough should deliver around 210 bed spaces of purpose-built student accommodation annually, which equates to 4 per cent of the borough's annual London Plan housing target. Therefore, the policy seeks to prevent additional student housing delivery in the Stratford and Maryland neighbourhood unless linked to a campus-based expansion, noting that the majority of pipeline and delivered student bed spaces in recent years have been provided within this neighbourhood.

3.194 Newham's latest evidence of housing needs suggests that Newham campuses account for a small proportion (around six per cent) of students enrolled in higher education providers in London as of 2020/21. Accordingly, the policy seeks to regulate levels of student housing delivery and manage potential over-concentration, to better reflect Newham's higher education economy. This approach seeks to secure associated local jobs and economic benefits that student accommodation accompanied by campus expansion can provide without undermining the delivery of general needs housing. Outside of Stratford and Maryland and areas of over-concentration, student housing delivery will also be supported in town and local centres with good public transport connectivity, recognising in particular the public transport links offered by the Hammersmith and City, District and Elizabeth Line stations in the borough to London's large higher education facilities.

3.195 This approach to regulating purpose-built student accommodation delivery recognises that general needs housing offers the most flexible accommodation over the long-term. Alongside delivering appropriately located accommodation, the policy also requires the delivery of affordable student bed spaces and looks to ensure that social infrastructure, namely libraries and exercise facilities, in proximity of new student accommodation do not face undue pressures as a result of new student populations who require space to study and exercise.



Implementation

ALL	This policy will seek to monitor over-concentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-concentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing, including existing or approved purpose built student accommodation sites, being located within a radius of 300 metres from the proposal site. In assessing overconcentration, student accommodation will be measured using a ratio of the average number of students living in student only accommodation, using the published census data (based on the 2021 Census, 2.4 bedrooms would be counted as a single home). General needs housing will be measured on a unit basis. For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'. For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.
H8.1	Part 1 of the policy sets out spatial requirements for the delivery of purpose built student accommodation in the Stratford and Maryland Neighbourhood. In the Stratford and Maryland neighbourhood, developments for purpose-built accommodation will only be permitted where they either deliver a campus-based expansion linked to an existing higher education campus in the neighbourhood or are replacing an existing facility.

H8.1	In the case of campus-based expansions, these developments should be located within or adjacent to an existing campus development in the neighbourhood.
H8.2	Part 2 of the policy sets out spatial requirements for the delivery of purpose built student accommodation in all other neighbourhoods outside of Stratford and Maryland Neighbourhood. Accommodation should either be directed to campus developments within Newham, or to town centre or local centre locations that are well-connected by public transport, with a minimum base year Public Transport Accessibility Level of 4. Forecast Public Transport Accessibility Level increases may be considered where there is sufficient certainty improvements to Public Transport Accessibility will be delivered (for example, a public transport improvement project linked to the forecast increase is underway). Where a new development would lead to an over-concentration of student accommodation in a neighbourhood (see definition of over-concentration in the 'ALL' implementation text for Policy H8 above), accommodation should either: • solely provide a replacement facility; or • deliver a campus-based expansion linked to an existing higher education campus in the borough. These developments should be located within or adjacent to an existing campus development in the borough.

H8.3	Affordable student accommodation is defined in the London Plan 2021 Policy H15, with the appropriate rent level published annually within the Mayor of London's Annual Monitoring Report. Developments that fail to provide affordable student accommodation in line with the requirements of part 3 of the policy will be required to provide a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. This viability assessment should use a Benchmark Land Value that uses an Existing Use Value plus premium approach. The viability assessment will be independently assessed. These developments will also be subject to review mechanisms as set out in Local Plan Policy BFN4.
H8.4	Areas of over-concentration will be assessed in accordance with the definition of over-concentration in the 'ALL' implementation text for Policy H8 above. In areas that don't experience over-concentration of purpose-built student accommodation, the majority of purpose-built student rooms are required to be secured through a nominations agreement as part of a development's legal agreement. This agreement should ensure that reasonable endeavours are used to secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, for occupation by students of one or more higher education providers by the point of first occupation. At pre-application stage, a letter of comfort should also be provided by the interested Higher Education Provider(s), showing the provider's intent to continue discussions with the developer and indicate their likelihood to enter into contractual obligations with the developer in relation to the proposals. The letter of comfort should also outline the provider's present and future accommodation needs, and how the design of the development meets these needs.

H8.4	If a nominations agreement cannot be secured by the point of first occupation, the local planning authority should be notified to show that all reasonable endeavours have been taken. In the interim, a cascade mechanism of direct lets should be secured. The following hierarchy will be applied: • full-time higher-education students at local Higher Education Providers (within Newham's borough boundary). • those at other London HEPs with good sustainable transport connections to the site. • any other higher-education student at a London HEP campus. • as a last resort, any other higher-education student with a need to reside in London. Proposals that would create or worsen an over-concentration of purpose-built student accommodation should secure all of the bedrooms in the development through a nomination agreement with a higher education provider(s). Where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8 part 1.a or H8 part 2.a, the policy requires the nominations agreement to be secured for occupation by students of the higher education provider that the development is located within or adjacent to. Proposals creating an over-concentration will need to provide additional certainty around a nominations agreement being signed prior to first occupation of the development in accordance with the requirements of parts 4.b and 4.c of the policy. Developments seeking to comply with parts 4.b and 4.c of the policy will not have a cascade mechanism of direct lets forming part of their legal agreement. Without sufficient certainty of nominations provided throughout pre-application and application discussions, an application will be refused.

H8.4	In order to demonstrate certainty around a nominations agreement being signed, it is expected that the Higher Education provider(s) who are expected to sign up to a development's nominations agreement attend pre-application meetings for a proposal. This is to demonstrate that the design of a development has taken into consideration the needs of the Higher Education provider whose students the development will be accommodating.
H8.5	Developments for purpose-built student accommodation should provide ancillary communal space for study and exercise to meet the needs of their student population proportionate to the scale of the development. There is an exception to this requirement where existing campus-based student study and/or exercise spaces are within 1,200m of the development (a 15 minute walk, to support the delivery of a network of well-connected neighbourhoods) and have the capacity to meet the increased need from the new development, which would need to be evidenced as part of a submission. Regarding the provision of exercise facilities, consideration should be given to how affordable the facilities are for students to access, recognising this provision should be meeting the needs of students living in the new accommodation. Developments delivering new or expanded education floorspace alongside the provision of student accommodation should also meet the requirements of Policy SI4. This policy contains specific requirements on providing access to other community uses outside of core hours.
H8.6	Residential management plans should outline management practices that minimise safeguarding risks, maximise opportunities for students to create and sustain social networks and access appropriate support, and ensure that the development minimises amenity impacts. Regarding appropriate support, a development's residential management plan should set out how students can conveniently access staff who can offer trained pastoral support, with links to the Higher Education provider(s) signed up to the nominations agreement. Residential management plans should also include details of: safeguarding practices; health and safety procedures; the maintenance of the accommodation and any communal spaces provided; and how the accommodation will be used outside of term time.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Local Plan Viability Assessment, BNP Paribas (2024)

Policy Links

Local Plan:

- BFN4: Developer contributions
- H3: Affordable housing
- H11: Housing design quality
- SI2: New and re-provided community facilities and health care facilities
- SI4: Education and childcare facilities
- Section 4: Neighbourhoods

London Plan 2021:

- H4 Delivering affordable housing
- H15 Purpose-built student accommodation

Policy H9: Houses in multiple occupation and large-scale purpose-built shared living

1. Developments for houses in multiple occupation and large-scale purpose-built shared living developments should include a detailed and resourced residential management plan.

2. Houses in multiple occupation secured under the requirements of Local Plan Policy H2 part 4 should be secured as long-term additions to the supply of low-cost residential, by ensuring that rents are capped at a rate agreed with Newham Council.

3. Large-scale purpose-built shared living developments should deliver:
    a. affordable housing in accordance with Local Plan Policy H3, where housing is being delivered as part of a wider mix of tenures including build for sale housing within the application boundary; or
    b. a payment in lieu contribution towards general needs affordable housing. The payment in lieu contribution should secure a higher level of affordable housing provision than the 50 per cent target sought by Local Plan Policy H3 part 1.

Developments for large-scale purpose-built shared living that are proposing to not meet the requirements of parts 3.a or 3.b will not be supported unless an application is accompanied by a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered.

4. Large houses in multiple occupation (sui generis) or large-scale purpose-built shared living developments should be directed to town and local centres or along major roads well connected by public transport (with a minimum Public Transport Accessibility Level of 4).

5. Large-scale purpose-built shared living developments should be under single management, with a minimum tenancy length of three months.

6. Main town centre uses or social infrastructure provided within large-scale purpose-built shared living developments are only acceptable in suitable locations and if the facilities are publicly accessible.

Planning Obligations

- Affordable housing delivery will be secured in perpetuity via an application's legal agreement. The legal agreement will also secure relevant review mechanisms, as per the requirements of Policy BFN4.
- Payment in lieu will be secured via an application's legal agreement.

Justification

3.196 Policy H9 seeks to ensure that shared accommodation is delivered in suitable locations, is neighbourly and contributes to the supply of affordable accommodation within the borough. Latest housing needs evidence suggests that recent graduates are increasingly occupying houses in multiple occupation given pressures on the availability of social housing and rising private rents. Accordingly, there is a necessity in Newham to balance the need to protect family housing from conversion while also allowing for the delivery of new houses in multiple occupation that are of a high-quality and affordable to young people.

3.197 Policy H9 covers different types of shared accommodation, houses in multiple occupation and large-scale purpose-built shared living (sui generis). While large-scale purpose-built shared living developments are described in the London Plan as being generally of at least 50 units, in Newham large-scale purpose-built shared living is defined

as typically being occupied by over ten individuals. This definition is lower in Newham, to reflect the Authority's Guidance on Accommodation Standards for licenced houses in multiple occupation, which provides quality standards for homes occupied by up to ten sharers. It is important that shared accommodation occupied by more than ten people is of sufficient quality to support a higher intensity of occupation. Where developments between 11 and 50 occupiers cannot meet the additional policy requirements for large-scale purpose-built shared living developments it will be more appropriate to deliver general needs housing, which represents the majority of Newham's housing need.

3.198 Forms of shared accommodation that are more intensely occupied, namely large houses in multiple occupation (sui generis) and large-scale purpose-built shared living developments, are directed to well-connected sections of the borough's major roads where residents will have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing, including increased trip generation and the potential amount of noise and waste generated from the housing. Large-scale purpose-built shared living developments are also expected to deliver affordable housing, either as part of a wider mix of tenures or via a payment in lieu of affordable housing.

Implementation

ALL	Policy H9 includes requirements for different forms of multiple occupancy housing. These include: • Houses in multiple occupation: There are two types of houses in multiple occupation: - Houses in multiple occupation (C4): Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom. - Large houses in multiple occupation (sui generis): Shared houses occupied by between seven and ten unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom. For the purposes of Newham's Local Plan, shared accommodation occupied by eleven or more unrelated individuals is considered to be a large-scale purpose-built shared living development. • Large-scale purpose-built shared living: Shared housing occupied by over ten individuals, as their only or main residence, who shared basic amenities including kitchens and communal amenity areas. Additional services and facilities are often included within these developments such as room cleaning, bed linen, on-site gyms and concierge services. Private rooms within large-scale purpose built shared living should not be able to be lived in as self-contained accommodation. This form of housing can sometimes be referred to as 'co-living'. Where policies refer to 'houses in multiple occupation', they are referring to both 'houses in multiple occupation (C4)' and 'large houses in multiple occupation (sui generis)'. Where policies are referring to only one form of 'houses in multiple occupation', they will refer to either houses in multiple occupation (C4)' or 'large houses in multiple occupation (sui generis)'.
H9.1	Residential management plans should contain: • management practices that minimise safeguarding risks; and • opportunities for residents to create and sustain social networks; and • measures that will minimise the housing's amenity impacts; and • security and fire safety procedures.

H9.1	For large-scale purpose-built shared living developments, the residential management plan should also include all of the following: • confirmation that the accommodation will be under single management, with a minimum tenancy length of three months; • maintenance of the internal and external areas of the building, including communal spaces and private rooms; • how services for the residents will operate, for example the concierge service, gyms, room cleaning or linen changing services; • the management of deliveries for servicing the development and residents; and • arrangements for moving in and out of the accommodation.
H9.2	For houses in multiple occupation secured under Policy H2 part 4 as housing for Newham Care Leavers or homeless single people or people owed a homelessness duty by Newham Council, adherence with this policy should be demonstrated via rents being agreed with Newham's relevant commissioning service, evidence of which should be submitted alongside a planning application.
H9.3	The affordable housing requirements for large-scale purpose-built shared living will depend on whether large-scale purpose-built shared living is being delivered as part of a wider mix of tenures within an application's boundary. If a wider mix of tenures including build for sale housing are being proposed, then developments are expected to deliver genuinely affordable housing in accordance with the requirements of Policy H3 of the Local Plan. Affordable homes should be delivered on site in the general needs housing element of the scheme, with affordable housing targets being calculated using the overall residential floorspace of the development (including any large-scale purpose-built shared living floorspace). If large-scale purpose-built shared living is being delivered as the sole tenure on site, then developments are expected to deliver a payment

H9.3	in lieu contribution towards general needs affordable housing provision, at a higher level of affordable housing to Newham's overall 50 per cent affordable housing target. Developments that fail to provide affordable housing in line with the requirements of parts 3.a or 3.b of the policy will be required to provide a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered. This viability assessment should use a Benchmark Land Value that uses an Existing Use Value plus premium approach. The viability assessment will be independently assessed. These developments will also be subject to review mechanisms as set out in Local Plan Policy BFN4.
H9.4	Part 4 of the policy includes requirements for the location of more intensely occupied forms of multiple occupancy housing. These include large houses in multiple occupation (sui generis) and large-scale purpose-built shared living developments. The policy requires these forms of multiple occupancy housing to be located within Town and Local Centres or along major roads well connected by public transport (with a minimum Public Transport Accessibility Level of 4). For the purposes of H9 part 4, major roads are key arterial routes and local and destination routes which have town centres and local centres situated along them and/or are A roads within the borough.
H9.5	These details should be set out in a development's residential management plan.
H9.6	Part 6 of the policy does not apply to ancillary facilities such as gyms or shared workspaces provided specifically for residents of the accommodation. Suitable locations are those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 and Policy J1 and social infrastructure under Policy SI2.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Local Plan Viability Assessment, BNP Paribas (2024)

Policy Links

Local Plan:

- BFN4: Developer contributions
- H2: Protecting and improving existing housing
- H3: Affordable housing
- H11: Housing design quality
- HS1: Newham's Town Centres Network
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services
- SI2: New and re-provided community facilities and health care facilities

London Plan 2021:

- H4 Delivering affordable housing
- H6 Affordable housing tenure
- H16 Large-Scale Purpose-Built Shared Living



Policy H10: Gypsy and Traveller accommodation

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.

2. The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller accommodation. The enhancement and where feasible intensification and/or expansion of the site will be supported to contribute to meeting the ten-year pitch target.

3. Developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches and transit sites and sites for negotiated stopping, will be supported where they meet identified need.

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.

5. Developments that propose accommodation to meet the needs of Gypsies, Travellers and Travelling Showpeople should:
    a. provide an appropriately detailed management plan; and
    b. demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy, Traveller and Travelling Showpeople community.

Justification

3.199 Policy H10 seeks to ensure that the housing needs of Gypsy, Traveller and Travelling Showpeople' communities are met. Under the government's published Planning Policy for Traveller Sites, Gypsies and Travellers are considered to be:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

3.200 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. London's latest evidence of Gypsy and Traveller accommodation needs indicates a need for 39 pitches in the borough to 2037 (including backlog need from 2022), which breaks down as follows:

	Phase 1 (Short term) 27/28 - 31/32	**Phase 2 (Medium term) 32/33 - 36/37**
Total need for each phase	34 pitches	5 pitches

Of this need, approximately 16 pitches are expected to meet the needs of the community currently living at the borough's existing Gypsy and Traveller pitch site, while 23 pitches are needed to meet the needs of the Gypsy and Traveller community living in bricks and mortar homes.

3.201 We will seek to meet the need identified through the Council's Small Sites Options Appraisals and Modular construction programme.

3.202 Policy H10 allows for developments for new pitches to come forward in appropriate locations that have access to necessary services and infrastructure. The Local Planning Authority will continue to work with colleagues in housing to meet the accommodation needs of Newham's Gypsy and Traveller community where sites are proposed to be brought forward on publicly owned land. The policy also sets design quality requirements that new developments for Gypsy and Traveller accommodation should meet. These seek to deliver high-quality accommodation, while also looking to address the health inequalities that Gypsy, Traveller and Travelling Showpeople communities can often face.

Implementation

H10.1	This target will be monitored in accordance with the plan's monitoring framework.
H10.2	The designated Gypsy and Traveller site is labelled 'Gypsy and Traveller Site' on the policies map. Any development brought forward on the safeguarded site for uses other than Gypsy and Traveller accommodation will be refused.
H10.3	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 or the London Gypsy and Traveller Accommodation Needs Assessment, but additional details can be submitted alongside the application as necessary. This could be in the form of an up to date, robust needs assessment or evidence about personal circumstances and the adequacy of existing accommodation provision.
H10.4	Part 4 of the policy sets out locational requirements for new Gypsy and Traveller accommodation. Accommodation proposed in flood zone 2 should be justified with regards to the requirements of Policy CE7. The policy also sets out requirements for infrastructure provision and access to services and facilities. Primary physical infrastructure should include access to waste management, as well as access to specialist utility and communal spaces, and accommodation and access for large vehicles.
H10.5	A Maintenance and Management Strategy will be secured to ensure the long-term and suitable maintenance and management of the site and its infrastructure. A site's residential management plan should outline how features such as communal infrastructure are managed on an ongoing basis to maintain neighbourliness within and beyond the site and ensure housing quality and amenity for residents. This should be proportionate to the scale of the development proposed. Applicants can refer to good practice design guidance (for example, see Places we are proud of: A short guide to providing and managing site for Gypsies and Travellers (2021)) and should demonstrate that quality standards have been co-designed with representatives of Newham's local Gypsy, Traveller and Travelling Showpeople communities.

Evidence base

- Newham Gypsy and Traveller Accommodation Assessment, Opinion Research Services (2022)

Policy Links

Local Plan:

- H1: Meeting housing needs
- CE7: Managing flood risk and drainage

London Plan 2021:

- H1: Increasing housing supply
- H14: Gypsy and Traveller accommodation
- SI12: Flood risk management

Policy H11: Housing design quality

1. All new residential development should be designed to:
    a. locate building structural elements to enable internal reconfiguration and minimise irregular geometry that limits reconfiguration of internal layouts; and
    b. promote health and wellbeing of residents by providing good living and environmental conditions including high levels of natural daylight, sunlight, natural ventilation and individual climate controls, by maximising internal levels of daylight through orientation, articulation and incorporation of breaks in massing.

2. All new general needs housing should be designed to:
    a. meet the internal space standards of the London Plan 2021 as a minimum, as well as provide adequate external private outdoor space (as set out in London Plan Guidance or subsequent updates); and
    b. minimise the number of private outdoor amenity spaces accessed from bedrooms; and
    c. ensure the number of dual-aspect dwellings are maximised, including all three or more bedroom dwellinghouses (C3) which must be dual-aspect; and
    d. avoid single-aspect dwellinghouses (C3), particularly where these are north-facing; and
    e. provide an adequate boundary treatment to ground floor street-facing amenity space and locate ground floor private amenity spaces away from roads that are a source of significant noise, air quality or visual impacts.

3. New developments of specialist and supported housing or residential other than general needs housing should have evidenced regard to the following applicable quality design standards:
    a. Specialist and supported housing providing care should have evidenced regard to:
        i. Care Quality Commission criteria or any subsequent updates or replacements where relevant; and/or
        ii. HAPPI principles where housing is designed for older people; and
        iii. meeting a Setting the Standard Temporary Accommodation Inspection Service Ranking of Grades A, B or C, where the housing will provide temporary accommodation; and
        iv. the Council's Housing Support Approved Accommodation Standards or any subsequent updates or replacements where relevant; and
        v. providing sufficient space for care workers to undertake personal care in the bathroom and main bedroom, where relevant; and
        vi. supporting the ability to install telecare if required in the future.
    b. Specialist housing for older people should provide:
        i. ten per cent of private rooms as wheelchair adapted rooms, including access to a wheelchair-accessible wet room and in line with best practice guidance; and
        ii. sufficient storage space and charging facilities for residents' mobility scooters; and
        iii. pick up and drop off facilities, close to the principal entrance, suitable for taxis (with appropriate kerbs), minibuses and ambulances.
    c. In addition, extra care housing for older people should provide:
        i. bedrooms that are at least 12m^2; and
        ii. living areas at least 20m^2 in size; and
        iii. enough space for residents to move around comfortably and accommodate their belongings; and
        iv. a layout that is easy to navigate; and
        v. a variety of communal spaces for residents to socialise and relax.
    d. In addition, older persons' care homes should incorporate dementia friendly design.
    e. Purpose-built student accommodation should provide accessible student accommodation having regard to London Plan Guidance: Purpose-built Student Accommodation and local evidence of need.

f. Houses in multiple occupation and large-scale purpose-built shared living should:
   i. have evidenced regard to Newham and Pan-London Private Sector Rental Licensing benchmark criteria; and
   ii. ensure all private rooms, internal kitchen and communal facilities have openable windows to allow for adequate access to daylight, sunlight and ventilation in habitable spaces; and
   iii. provide a minimum of 1m^2 built in storage per resident in either private rooms or communal areas; and
   iv. provide internal communal space arranged so as to provide sufficient and convenient access for all residents. Internal communal space should meet or exceed the following standards:

Up to 100 residents	4m^2 per resident
Between 101 and 400 residents	3m^2 per additional resident above 100 residents
401 residents and above	2m^2 per additional resident above 400 residents

g. In addition, large-scale purpose-built shared living should provide:
   i. communal kitchens on every floor, with any alternate arrangements required to demonstrate convenient access for residents; and
   ii. ten per cent of private rooms as wheelchair adapted rooms in line with best practice guidance; and
   iii. private rooms of between 18-27m^2 and wheelchair adapted rooms between 28m^2-37m^2.

4. Development referable to the Mayor of London should design a proportion of social rent rooms in accordance with the recommendations of Newham's 'Housing design needs of neurodivergent residents and residents with learning disabilities in Newham Design Guide'.

5. Major residential developments should incorporate shared amenity spaces that foster social interaction and a sense of community. External communal amenity spaces should be designed to:
   a. provide 50m^2 for the first ten residential units or private rooms (if not self-contained) and 1m^2 for each additional residential unit or private room (if not self-contained); and
   b. provide overlooked, attractive, landscaped spaces easily accessible to all residents. Direct access should be provided where possible between the communal courtyards and adjacent private terraces; and
   c. offer spaces with a variety of functions; and
   d. avoid external spaces that face onto major roads with higher levels of noise and air pollution; and
   e. where the development is likely to be used by children and young people, provide onsite play provision in accordance with both the requirements of London Plan 2021 Policy S4 and Local Plan Policies GWS5 and, where relevant, D2. Off-site play space will only be supported in exceptional circumstances where it can be demonstrated that it would lead to the provision of facilities, accessible to the development site, which are of greater quality and quantity than can be provided onsite.

6. Developments which include affordable housing should ensure:
   a. affordable housing is of an equivalent quality to private residential units in terms of its location, orientation, proportion, external appearance, communal entrances and amenity areas, without resulting in a significant increase in the cost of tenants of affordable housing's service charges.
   b. access to any on-site services and facilities are provided via a membership model, available to all residents at a comparable cost to other Newham-run and private facilities in the locality.

7. All new residential developments should:
    a. meet requirement M4[2] of Building Regulations Approved Document M (for 'accessible and adaptable dwellings') as a minimum and ten per cent of residential dwellings in new residential developments should meet the enhanced requirement M4[3] of Building Regulations Approved Document M (for 'wheelchair user dwellings'); and
    b. where they are delivering social rented homes that are wheelchair user dwellings, design these dwellings to meet Building Regulation M4[3](2)(b) standard (wheelchair accessible dwellings); and
    c. where they are delivering social rented wheelchair accessible dwellings (Part M4[3](2)(b)), be designed to provide:
        i. a mix of dwelling sizes and all such dwellings contain only double and not single bedrooms; and
        ii. where feasible, two lifts, where such dwellings are provided on upper floors; and
        iii. a layout that allows sufficient room for turning circles within the dwellings and in communal areas when furniture layouts are taken into consideration; and
        iv. a layout that avoids long corridors with unpowered heavy communal doors; and
        v. a layout that avoids long travelling distances from dwellings to blue badge parking bays.

8. A portfolio approach to the delivery of wheelchair user dwellings (M4[3] of Building Regulations Approved Document M) will be supported where it can be demonstrated that the wider portfolio of developments meet the requirements of part 7 above. Developments within a portfolio delivering additional wheelchair user dwellings should be completed and ready for occupation prior to the developments within the portfolio that deliver wheelchair user dwellings below the policy target set out in part 7.a above.



Table 14: Application of Policy H11 to different housing types

	General needs housing	Supported and specialist housing	Specialist housing for older people	Purpose-built student accommodation	Houses in Multiple Occupation (C4)	Large houses in multiple occupation (Sui Generis)	Large-Scale Purpose-Built Shared Living
H11.1	✓	✓	✓	✓	✓	✓	✓
H11.2	✓		✓ If proposing sheltered or extra care housing				
H11.3		✓	✓	✓	✓	✓	✓
H11.4	✓		✓ If proposing sheltered or extra care housing				
H11.5	✓	✓	✓	✓		✓	✓
H11.6	✓		✓ If proposing sheltered or extra care housing	✓			
H11.7	✓		✓ If proposing sheltered or extra care housing				
H11.8	✓		✓ If proposing sheltered or extra care housing				

Planning Obligations

- Access to services and facilities should be provided via a membership model, with access for residents living in affordable housing being of a comparable cost to using other Newham-run and private facilities in the locality. This will be secured through a development's legal agreement.
- Contributions to off-site play space provision or the improvement of a nearby existing play space and its maintenance will be secured. Any shortfall in the required amount of child play space will be charged at £950 per square metre. £950 per square metre is an average cost in Newham for delivering play space, which includes all costs including maintenance, fees and construction costs.

  These will be calculated using the following formula: Delivery of off-site play space: £950 cost x play space area (sqm) = financial contribution

Justification

3.203 Policy H11 ensures that housing developments are designed for long term comfort and flexibility, and ease of maintenance. The design of homes should support residents to maintain good physical and mental health and be designed with adaptability in mind. This may include increased space for homeworking and study, provision of private gardens or amenity spaces, creating well-lit and airy spaces and, in larger developments, providing areas for play and communal recreation. Homes should also be able to adapt to people's changing needs as they age. In tandem with policies promoting the provision of genuinely affordable housing, securing the delivery of high-quality housing is a key means to improve the health of our residents. The policy also sets an expectation, as per the London Plan 2021, that all new homes delivered will be wheelchair accessible, with 10 per cent of new homes being either adaptable or adapted to meet the needs of disabled residents. Provision of fully wheelchair adapted social rent homes will help to meet the needs of people on the Council's waiting list.

Implementation

ALL	The requirements of Policy H11 are intended to be read in conjunction with, and build upon, the requirements of London Plan 2021 policy and guidance, notably the Housing Design Standards London Plan Guidance (June 2023). They apply to all new housing developments, including homes created from subdivision, conversion or new builds.
H11.1	Applicants should submit adequately detailed drawings showing furniture layouts, including as part of pre-application discussions where detailed designs are considered so that officers can make an assessment against H11 part 1a. Developments should maximise non-load bearing walls to allow for potential future reconfiguration, and mark these on application drawings or within the design and access statement.
H11.1	Where requested by the Council's Design Officer, drawings should illustrate alternative furniture layouts that maintain circulation and views out. Developers should refer to the best practice standards around 'Choice and flexibility' in the Housing Design Standards London Plan Guidance (June 2023), and incorporate these, where feasible, into the design of new housing. Similarly, the design of rooms should allow for different functions throughout the day through intelligent placement of windows, doors, internal lighting, power and providing sufficient room widths. Considered placement of fenestration, lighting, sockets and utilities can allow for both layout changes and ease of maintenance. For example, the provision of cable ducts can enable convenient access to a home's electrics. This can also allow for rooms to provide different functions (for example living rooms could be used as areas for studying, play or exercise throughout the day). Typically, habitable rooms within general needs housing should be designed to allow for the potential use as a bedroom. New housing developments should seek to comply with the Building Research Establishment (BRE): Site layout planning for daylight and sunlight: a guide to good practice (BR 209 2022 edition), or any subsequent updates to the guidance.

H11.1	Window placement should allow for natural light and ventilation within habitable spaces. Kitchens in dual aspect homes should allow for natural light and for the potential separation from dining or living spaces. Positioning and height of glazing should be considered in terms of the impact on furniture placement and residents' privacy. Windows should be designed with an unobstructed openable area of at least 0.33m^2 and a minimum of 450mm high and wide, to allow for means of escape in an emergency.
H11.2	Part 2 of the policy sets the expectation that developments for general needs housing should meet the internal space standards of the London Plan 2021 and provide adequate external private outdoor space. This includes the requirement to provide built-in storage within a home. Further guidance on minimum and best practice internal space standards and storage are set out in the Housing Design Standards London Plan Guidance (June 2023). The relevant number of bed spaces for a home will be determined based on the size of bedrooms shown on the application drawings; for example, if a one bed home provides a double-sized bedroom of 11.5sqm, then it will be assessed against the minimum gross internal floor area standard for a one-bedroom, two-person home. Developments should provide good quality outdoor private external amenity space that is proportioned to be easily used and adapted to the functions that a garden should have, such as dining and drying laundry. Private amenity space should be accessed from, and feel like a usable extension of, a home's main living space. These spaces should also be large enough to allow for all occupants to use the space together. At certain heights, typically above the seventh storey, recessed or semi-recessed balconies, or enclosing balconies as glazed, ventilated winter gardens may be appropriate. Where proposed, these should follow the quality standards set out in the Housing Design Standards London Plan Guidance (June 2023).

H11.2	Where poor external conditions are present, for example where housing would be sensitive to significant noise, air quality or visual impacts, homes should provide an alternative aspect, with private external amenity spaces located on the aspect with better environmental conditions. Developments should avoid placing bedrooms on street-facing facades at ground level. Where this is unavoidable, the design of boundary treatments and defensible space need to be carefully considered to allow for convenient and private use of the bedroom by residents. This should take into consideration privacy and amenity issues, as well as the requirements of Policy D1. Where bedrooms are provided on the ground floor, at least one ground floor bathroom should provide washing facilities able to be adapted for use by people with reduced mobility. In seeking to avoid the provision of single-aspect, north-facing homes, typologies such as gallery access homes, maisonettes or larger through-units (homes that extend the full depth of a building) should be considered along north-facing facades. One or two-bedroom single aspect homes may be acceptable if they are generously sized (at least 10 to 15 per cent above the minimum gross internal floor areas standard), shallow in plan (i.e. not too deep) and east or west facing. Where these are proposed, development should set out how these units will benefit from adequate daylight and privacy and how they meet relevant passive design principles, in accordance with the requirements of CE4.2.

H11.3

When designing supported and specialist housing, applicants should consult with relevant London Borough of Newham commissioning teams about the quality of proposed housing provision.

The Council's Housing Support Approved Accommodation Standards can be found on the Council's website.

Setting the Standard is a centralised inspection service that grades temporary accommodation based on health and safety requirements. Further information can be found about the inspection criteria and design requirements on the Commissioning Alliance's website: Setting the Standard (StS) - Commissioning Alliance

Alongside the standards set out within part three of the policy, applicants providing specialist and supported housing are also encouraged to review good practice design guidance related to the housing type they are providing. Applicants should refer to any good practice design guidance that has informed design within their supporting planning documents. The design of homes should also help facilitate effective management of the housing, for example providing a room where carers can sleep in addition to dedicated offices.

Like developments for general needs housing, it is expected that 10 per cent of private rooms in specialist older persons housing and large-scale purpose-built shared living are delivered as wheelchair accessible housing. This excludes specialist older persons housing that is considered to be 'general needs' housing, which should meet the requirements of part 7 of the policy. Drawings must demonstrate how the rooms provide wheelchair access. Rooms and communal areas should be designed in accordance with guidance relevant to the accommodation type set out in the following guidance BS 8300-2:2018 | 31 Jan 2018 | BSI Knowledge (bsigroup.com).

H11.3

Providing dementia-friendly design should build upon best practice set out in guidance.[39] Legible signage, tactile paving and hearing loops can aid residents' navigation through care homes.

Where providing accessible homes for these specialist housing typologies, applicants should provide drawings of indicative furniture layouts and measurements (in m^2) to ensure convenient use for residents who use a wheelchair. As well as private homes or rooms, the wider development should be designed for use by people who use wheelchairs or have reduced mobility. This includes the design and location of outdoor spaces, car and bicycle parking, communal facilities, communal door openings and internal circulation spaces e.g, hallways and lobbies. This should be clearly set out in planning application drawings.

For the purposes of H11 part 3.f.iv, internal communal spaces for houses in multiple occupation and large-scale purpose-built shared living should accommodate kitchen facilities, dining space and living areas. As part of the required internal communal space per resident, applicants may also optionally include workspace and other recreation or entertainment spaces for the exclusive use of residents and/or ancillary workspace without a charge. These optional spaces will count towards meeting the policy requirements of H11 part 3.f.iv, along with the required kitchen facilities, dining space and living areas.

Applicants in their planning statement should specify the expected maximum occupancy level of the proposed development. This will then inform the amount of internal communal space provided. For example, in a development expected to be occupied by 450 residents, 1,400m^2 of internal communal space should be provided:
(4m^2 x 100) + (3m^2 x 300) + (2m^2 x 50) = 1,400m^2.

[39] See Dementia Services Development Centre And University Of Stirling, Good Practice In The Design Of Homes And Living Spaces For People With Dementia And Sight Loss; Alzheimer's Society Dementia-Friendly Housing Guide (2017)

H11.3	In addition to the required internal communal space per resident, developments should provide laundry facilities, space for a concierge service for large-scale purpose-built shared living, circulation space, cycle storage and additional communal toilets. These requirements and the requirement for 1m^2 built in storage under H11 part 3.f.iii should be provided in addition to the requirements for the minimum internal communal space required per resident.
H11.4	An application's design and access statement should set out how they have addressed the recommendations of Newham's 'Housing design needs of neurodivergent residents and residents with learning disabilities in Newham Design Guide'. This guidance looks at the housing design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It includes guidance on design measures that can be incorporated into new homes to meet the needs of these groups, or residents who have been unable to find a social rent property whose design and layout meets their needs.
H11.5	This requirement for the provision of communal external amenity space should be read in conjunction with the qualitative guidance within London Plan Policies S4 and D6. Where site allocations are required to deliver publicly accessible open space, this should be in addition to the requirement to deliver external communal amenity spaces under this policy part. It is not necessary to provide external communal amenity space dedicated to each building when there is more than one block in a development. However, such spaces should have convenient access for residents, typically within 100 metres of their building's entrance. Applicants should consider providing a range of usable spaces with different functions within a development's external communal amenity space provision, with adequate noise and privacy mitigation where needed. Irrespective of how these space(s) are distributed across a site, all residents of a development should be aware of and have access to all external communal amenity space.

H11.5	External communal space should be of a sufficient size so as to have a range of functions. Communal external amenity should be landscaped, accessible to residents with reduced mobility and should be well-overlooked. It is good practice to provide direct access to communal external amenity spaces from private terraces where possible. Above the seventh storey level, these spaces should be sheltered to allow for use throughout the year. For the purposes of H11 part 5.c, spaces with a variety of functions are defined as shared external amenity areas where residents are able to host informal social gatherings configured to their needs, for example birthday parties. For the purposes of H11 part 5.d, major roads are key arterial routes and local and destination routes which have town centres and local centres situated along them and/or are A roads within the borough. It is expected that the vast majority of shared amenity space is provided externally. However, if it is not viable to provide the required amount of shared amenity space externally, a small proportion of shared amenity space could instead be incorporated internally within the development. This should be a useable space, providing necessary facilities such as surfaces on which to make hot drinks and wash up. It is important that these spaces, if proposed, are accompanied by details of how they will be managed, and a comparison of the costs of providing a proportion of space internally, versus providing the full requirement of shared amenity space externally. If the provision of a proportion of this space internally would improve the viability of the scheme, and the cost of this space would not cause a significant increase in resident's services charges, this may be supported as an alternative.

H11.5	Where small sites are located adjacent to existing communal amenity land on existing housing estates, as defined through policy GWS1, the requirements of this policy could instead be met through delivering significant improvements to the existing communal amenity land. However, this will only be considered acceptable where it can be demonstrated that the reconfiguration of existing communal amenity land would deliver both improved biodiversity and functional green space value for the residents. Further guidance on how key interventions will be assessed can be found in the implementation text for Policy GWS1.3. Off-site provision and/or a financial contribution towards play provision will only be accepted where there are demonstrable site constraints and the council is satisfied that it would deliver a better outcome. Subject to agreement with the Parks and Leisure teams, this may include funding for the upgrade or assortment of play facilities in nearby parks or improvements to access arrangements from the development to the nearest park or playground. The financial contribution will be based on costs for similar upgrades to parks and play facilities undertaken by the council elsewhere in the Borough. The financial contribution will include maintenance and repair costs for a 15-year period based on comparable equipment / play facilities. The acceptability of off-site provision and/or financial contributions is at the discretion of the council.
H11.6	Consideration of H11 part 6.a, which requires affordable housing to be of an equivalent quality to private residential units, should be provided in an application's planning statement. Namely this should set out expectations around who is anticipated to take on management of communal spaces that have an impact on service charges. Keeping service charges affordable for residents of affordable homes should be of key importance.

H11.6	At an application stage there should be a consideration of whether design features would result in a disproportionate charge to tenants of affordable housing (for example, the need to abseil in order to clean windows may result in more costly service charges or use of more or less hardwearing materials). This should form part of a development's Design and Access Statement. For the purposes of H11 part 6.b, which requires access to any on-site services provided via a membership model, the comparable cost of other facilities in the locality should be determined by reviewing the nearest Newham Council managed and private facilities to a development site. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all.
H11.7	The requirements of Part 7.a are subject to taking account of site-specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings. In exceptional circumstance, and where robust justification is provided, developments may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3). For example, lifts may not be achievable on constrained sites with blocks of four storeys or less, and affected dwellings above ground floor may be required to satisfy the mandatory building regulations requirements of M4(1) via the Building Control process. It is expected that prior to the submission of major applications, or minor applications delivering M4[3](2)(b) homes, engagement is undertaken with the Council's Housing Occupational Therapist. They can provide further information on the size and demand for wheelchair user adapted homes, and such information should help inform the mix, design and distribution of wheelchair adapted dwellings provided within a development.

H11.7 Applicants should clearly set out within plans and an application's Design and Access Statement the location, size and tenure mix of M4[3] and M4[3](2)(b) dwellings. Applicants should provide drawings of indicative furniture layouts and measurements (in m^2) to ensure convenient use for residents who use a wheelchair.

As well as private dwellings or rooms, the wider development should be designed for use by people who use wheelchairs or have reduced mobility. This includes the design and location of outdoor spaces, car and bicycle parking, communal facilities, communal door opening and internal circulation spaces e.g., hallways and lobbies. This should be clearly set out in planning application drawings.

As the mix, design and distribution of wheelchair adapted dwellings provided within a development will have been informed through discussions with the Authority's Occupational Therapist, it is expected that any M4[3](2)(b) homes delivered through a development should be allocated to individuals on the Authority's waiting list for affordable wheelchair adapted dwellings. M4[3](2)(b) dwellings should be clearly indicated within the submission, with the design allowing for swift occupation of the dwellings on the completion of a development.

Applicants should demonstrate as part of a proposals design and access statement how they have addressed the criteria of part 7.c of the policy. Where developments are unable to meet all of the design requirements set out in this policy, the supporting documentation should set out clear and convincing justification and evidence that delivering these on site is unfeasible, and that detrimental impacts of these choices have been mitigated. For example, M4(3) dwellings may be accessible from the ground floor where only one lift is provided, or housing mix may be based on feedback from the Council's Occupational Therapist to address longstanding needs (in particular, the need to deliver larger fully adapted social rent homes with four or more bedrooms).

H11.8 It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted housing being delivered on the ground floor of a development. This may, in turn, limit the ability of individual developments to meet the overall 10 per cent quota; result in a limited distribution of M4[3](2)(b) dwellings at ground floor in neighbourhoods within flood risk areas; or result in homes at upper floor with access to only one lift, where it is only viable to deliver one lift per core on smaller major developments.

Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to address this issue. The justification for such an approach should be set out within an application's supporting documentation.

Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Newham Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)

Policy Links

Local Plan:

- H1: Meeting housing needs
- H2: Protecting and improving existing housing
- H5: Build To Rent housing
- H6: Supported and specialist housing
- H7: Specialist housing for older people
- H8: Purpose built student accommodation
- H9: Houses in multiple occupation and large-scale purpose-built shared living
- HS2: Managing change within Town and Local Centres
- HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services
- SI1: Existing community facilities and health care facilities
- SI2: New and re-provided community facilities and health care facilities
- GWS1: Green Spaces
- GWS5: Play and informal recreation for all ages

London Plan 2021:

- D3 Optimising site capacity through the design-led approach
- D6 Housing quality and standards
- D7 Accessible housing
- S4 Play and informal recreation



GREEN AND WATER SPACES

3.204 Green and water infrastructure is essential to the successful development of the borough and is much loved and valued by the people living and working in Newham. The borough has an existing network of natural spaces; not just nature reserves, parks, and rivers but also playgrounds, playing pitches, allotments, gardens, hedges, green walls, green/brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Newham has a significant number of water spaces, including the historic Royal Docks. Newham also borders the three largest rivers in London, with the Thames to the south, the River Lea in the west and, to the east, the River Roding.

3.205 With a total of 916 hectares[40] of open space, which includes the borough's 332 hectares of water spaces, Newham has a rate of provision for all green and water space of 2.51 hectares per 1,000 residents. This is a precious, but scarce resource.

3.206 This infrastructure provides a significant range of benefits (often described as 'ecosystem services'), enhancing the health and wellbeing of people living in the borough, supporting Newham's economy by making the borough an attractive place to live and work and helping to address the twin challenges of the climate change and biodiversity emergencies. Newham's Just Transition Plan (2023) and the borough's health and wellbeing strategy, Well Newham, 50 Steps to a Healthier Borough (2024) recognise the important role open spaces play in helping address the climate emergency and improving our health and wellbeing. Green and water spaces can limit the risks to human health and the economy from extreme weather events and environmental threats through absorption of carbon dioxide and pollution, cooling the air and reducing the risk of flooding and pressure on sewage and water management systems.

3.207 The research undertaken in Newham's Green and Water Infrastructure Strategy (2025) informs the policies in this chapter. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor our green and water spaces. Green infrastructure provision and development pressure in Newham are such that the meaning of 'environment' in the borough needs to be re-considered. The idea that the 'environment' and access to nature are provided only in specific places must be replaced with an approach that identifies opportunities for better provision right across the borough. Developing an approach to green and water infrastructure that will support the delivery of a well-connected neighbourhoods with local green spaces for new play facilities, community growing opportunities and better walking, wheeling and cycling routes.

3.208 Easy and fair access to green and water space is important, it enhances the quality of our lives and makes Newham a more attractive and safer place. Well-connected, designed and managed green and water spaces provide social and cultural benefits, with spaces for physical activity, play and community events all helping to improve mental and physical health. Children, young people and adults need safe spaces for play and recreation which allow for the freedom to explore.

3.209 This chapter addresses the protection and enhancement of existing green and water spaces (quantity, quality, function, connectivity and accessibility), the creation of new biodiverse places, the development of green and waterside corridors to better link these spaces and the provision and protection of trees and hedges. It also ensures the provision of publicly accessible play and informal recreation.

This section contains the following policies:

- **GWS1: Green spaces**
- **GWS2: Water spaces**
- **GWS3: Biodiversity, urban greening, and access to nature**
- **GWS4: Trees and hedgerows**
- **GWS5: Play and informal recreation for all ages**



[40] Total open space provision includes: 1. Parks and Gardens; 2. Amenity greenspace; 3. Natural and semi-natural greenspace; 4. Water infrastructure; 5. Green corridors; 6. Outdoor sports facilities; Playgrounds; Allotments and growing spaces; Cemeteries and churchyards.

Policy GWS1: Green spaces

1. Development should provide or help to deliver easy access to a network of high-quality green spaces. This will be achieved through:
    a. protecting all existing green space to ensure there is no net loss, except where it meets the criteria set out in part 3 below; and
    b. maintaining the open character of Metropolitan Open Land and Green Belt in accordance with the London Plan (2021) and national Green Belt policy; and
    c. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing green space; and
    d. ensuring development next to green space does not negatively impact its functionality, connectivity, quality and accessibility; and
    e. maximising opportunities to deliver new and improved green space (including playing fields and ancillary sporting facilities), with particular focus on the locations which will experience the highest level of need over the plan period as set out in the Green and Water Infrastructure Strategy (2025) and the Playing Pitch Strategy (2025); including the requirements of the neighbourhood policies, site allocations and Local Plan Policies H11 and D2; and
    f. requiring development referable to the Mayor of London, or where a specific green space need has been identified by the Council, including in the site allocations, to provide on-site publicly accessible green space; and
    g. requiring all development to consider at the earliest opportunity the form, function, and extent of green infrastructure opportunities, to maximise urban greening and improvements to Newham's network of green links as part of schemes; and
    h. requiring major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement.

2. Existing playing fields 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 existing playing field is no longer required, as demonstrated by an assessment that the existing use is surplus to current and future needs; or
    b. the development is for ancillary facilities supporting the principal use of the site as a playing fields, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use; or
    c. the development affects only land incapable of forming part of a playing pitch and does not negatively impact the pitch or ancillary facilities; or
    d. the area of playing field to be lost as a result of the development will be replaced, prior to the commencement of the development, by a new area of equivalent or better quantity and quality playing field in a suitable location; or
    e. the development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field; and
    f. no adverse harm is demonstrated in a Social Value and Health Impact Assessment (see Local Plan Policy BFN3).

3. Developments resulting in the loss or reduction of existing green space (excluding Metropolitan Open Land and Green Belt) will only be supported where:
    a. it will not create or increase publicly accessible green space deficiency (at any scale); and
    b. replacement green space is provided on-site or, where this is demonstrated to be unfeasible, in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit, and;
        i. provides equivalent or better functionality, and quality; and
        ii. retains the maximum feasible quantity of green space to ensure no reduction in the overall useability, accessibility, recreational or ecological function of the space; or
    c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity

and functional open space value for the residents; or

d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and
   i. delivers a high standard of design which complements the character and appearance of the green space; and
   ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and
   iii. is designed for people of all ages and physical abilities.

4. Where a development is providing publicly accessible green space, it should:
   a. deliver welcoming spaces with a high standard of design which complements the local character and which are designed to be enjoyed by people of all ages and physical abilities; and
   b. be co-designed in consultation with local people, early on in the preparation of an application, to bring local views into the development of the space; and
   c. maintain, and maximise opportunities to deliver improvements to active travel and the borough's network of green links; and
   d. maximise biodiversity, delivering a minimum 10 percent Biodiversity Net Gain in a way that is particular to the local need and environmental character (see Local Plan Policy GSW3); and
   e. maximise tree planting to contribute to an increase in borough canopy cover (see Local Plan Policy GWS4); and
   f. demonstrate how landscaping choices respond to the climate emergency; and
   g. demonstrate how the scheme improves local air quality, through species selection and the layout of landscape features; and
   h. integrate Sustainable Urban Drainage Systems (see Local Plan Policy CE7); and
   i. evaluate Newham's Playing Pitch Strategy (2025) and deliver new playing field provision if required; and
   j. integrate play and space for informal recreation (see Local Plan Policy GWS5); and
   k. integrate community and/or food growing opportunities, where feasible and practical; and
   l. incorporate off-lead dog play and exercise space, where space allows.

5. It is expected that new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15 years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.

Planning Obligations

- Replacement off-site green space, with an appropriate Maintenance and Management Plan, will be secured if loss and replacement is considered acceptable.
- Contributions may be secured from residential development which generates additional demand for playing fields and ancillary sporting facilities but where a new playing pitch is not being delivered on-site.
- Securing a 15-year maintenance financial contribution may be required if the new publicly accessible green space is adopted by Newham Council.



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Justification

3.210 Newham's green spaces offer opportunities for social interaction and, in a densely populated borough, give a valued link to nature and a place of quiet retreat as well as a place of learning. There are also economic benefits, with beautiful green and water spaces encouraging people to spend time and money in a place and helping to generate and sustain green economy jobs.

3.211 Newham's green spaces are highly treasured by those living in the borough, and parts of the borough appear to be very green, however the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space.

3.212 Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Beckton, for example, is relatively well served with publicly accessible green space, with a rate of 2.25 hectares per 1,000 residents, significantly above the borough average. In contrast, Canning Town South has a rate of just 0.33 hectares per 1,000 residents.[41]

3.213 Over the Plan period, Newham's population is projected to increase by just over 25 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents over the Plan period.

3.214 In order for Newham to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 68 hectares of additional publicly accessible green space.

3.215 Newham has 11 allotments and community growing spaces with a total area of 17.1 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.05 hectares per 1,000 residents. Both the current and projected rates of provision in the Plan period are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

3.216 With a relatively low level of publicly accessible green space provision, when compared to other London boroughs, it is vital that we seek to deliver new and publicly accessible open spaces. We must also take every available opportunity to green the urban environment.

3.217 Of equal importance over the Plan period will be the protection of the spaces we already have, making sure we take a sensitive approach to their improvement. How well a green space is designed and the opportunities for activities to take place in it can encourage more physical activity and benefit social connection and mental health.

3.218 Playing fields and pitches play a vital role in building healthy neighbourhoods, contributing to physical, mental and emotional wellbeing. Without access to these spaces, the quality of life and wellbeing of our residents is reduced. The borough has identified playing pitch deficits for football, cricket, rugby union and tennis. Newham's Playing Pitch Strategy (2025) has established that the existing shortfalls identified can be met by better utilising current provision. As such, there is no present requirement for the creation of additional provision. However, with shortfalls existing, there is a clear need to protect all existing provision until all current and future demand is met (and with clear spare capacity established). There is also a requirement to replace provision to an equal or better quantity and quality before it is lost.



[41] Please note, the Green and Water Spaces Strategy (2024) uses Newham's pre-2022 Ward boundaries. The Wards were revised in 2022 but demographic data is currently unavailable for the new boundaries.

Implementation

ALL	For the purpose of the Local Plan, green space is defined as space in either public or private ownership, which can have unrestricted access, partially-restricted access or restricted access. This includes all vegetated open space of public value (whether publicly or privately owned), including: • parks, • woodlands, • nature reserves and other natural areas with wildlife conservation and other benefits such as storing flood water, • sports fields, and spaces which offer opportunities for sport and recreation, • play space, • grassed areas, • growing space (including allotments and community gardens), • green corridors (paths, rivers, railway embankments and cuttings, roadside verges, canals, parks and playing fields etc.), • derelict, vacant and contaminated land which has the potential to be transformed. These spaces are considered green space whether or not they are accessible to the public but it does exclude private residential gardens.
GWS1.1	This policy seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. Over the Plan period we will: • maintain 0.72 hectares per 1,000 residents of publicly accessible green space, • maintain 0.05 hectares per 1,000 residents of allotment and community garden space.

GWS1.1	Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings. **Functionality** Any new or enhanced green space should adopt a multi-functional approach to its design. This is to ensure that public space can provide as many different benefits as possible, whether they are direct benefits to people (e.g. leisure and recreational spaces) or indirect benefits (e.g. carbon sequestration and biodiversity connectivity). The Green and Water Infrastructure Strategy (2025) sets out how the functionality of a green space will be considered. Applicants must demonstrate the elements a green space (existing and/or proposed) and clearly set out how the development proposal will enhance its functionality. In addition to these functionality considerations, new or enhanced publicly accessible green space should also demonstrate how it meets the eight principles set out in the Public London Charter (2021). This includes ensuring public space is primarily offered for use by the public free of charge. Development next to green space must not negatively impact: • views into and out of green space • provision of natural light • the experience of people already using the space or the biodiversity value of the space due to intensification of use, with consideration to existing maintenance budgets

GWS1.1

Connectivity
To deliver improvements to connectivity, opportunities for new green links should be maximised between green spaces by creating more legible and greener routes along streets and through development sites along the link, especially where Low Traffic Neighbourhoods are being implemented. The Green and Water Strategy (2025) sets out opportunities to improve green links in Newham. These have been reflected in the Local Plan Neighbourhoods chapter and relevant site allocations. Housing estates can also play a role in the creation of green links.

Accessibility
Access points and public access to green space should be protected, enhanced, and created. Walking and cycle routes along or through green spaces should be improved and, where possible, expanded to provide improved wayfinding, safety, and better links to the existing transport network and other green spaces. The design of routes to, and within, green space must also improve equity of access.

Delivery of new and improved publicly accessible green space
Areas experiencing public green space and community growing space (including community growing and allotments) deficiency are set out in the Green and Water Infrastructure Strategy (2025).

Newham's Playing Pitch Strategy (2025) sets out the need for playing pitches over the plan period. We will have regard to Sport England's Sports Pitch Calculator and the findings of the Playing Pitch Strategy (2025) to determine an appropriate amount and type of contribution or provision of playing pitches with new residential development. For large-scale residential development, it may be considered appropriate to seek on-site provision of sports pitches.

GWS1.1

Where new pitches are determined as being required, consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing facilities. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for the relevant sports.

Contributions may be sought, for residential development which generates additional demand for playing fields and ancillary sporting facilities but where a new playing pitch is not being delivered on site. Contributions will be sought to enhance existing provision of playing pitches, based on additional demand generated by new residential development and in line with Local Plan Policy BFN4 and the Playing Pitch Strategy (2025).

The Plan's neighbourhood policies and site allocations identify where new publicly accessible green space, community growing space and playing pitches should be delivered.

The specific site allocation requirements for community growing space are detailed in Section 7 (Newham Green and Water Space Grid) of Newham's Green and Water Infrastructure Strategy (2025).

Site allocations should meet the requirements for the quantity/type of green space, community growing space and playing pitches identified.

GWS1.1

Site allocations specify the amount of publicly accessible green space required to address deficiencies identified in the Green and Water Infrastructure Strategy (2025). The definition of publicly accessible green space follows the hierarchy set out in Table 8.1 of the London Plan (2021) and includes:

- Local Park and Open Spaces (2 hectares minimum)
- Small Open Spaces (under 2 hectares)
- Pocket Parks (under 0.4 hectares)
- Linear Open Spaces

In addition to the required publicly accessible green space, site allocations must also deliver publicly accessible play space (Policy GWS5) and Multi Use Games Areas (MUGAs) where an identified need exists. These spaces are separate from the publicly accessible green space requirement but may be designed as a continuous or integrated provision. The detailed arrangement will be established through the co designed masterplanning process in accordance with Policy BFN2.

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.

Applications for development referable to the Mayor of London, or where a specific green or water space need has been identified by the Council, including in the site allocations will be required to provide publicly accessible green space.

GWS1.1

The need to provide this green space has been established through the work undertaken for Newham's Green and Water Infrastructure Strategy (2025) to understand were additional publicly accessible green space is required to maintain 0.72 hectares per 1,000 residents of publicly accessible green space; and where new community growing space is required to maintain 0.05 hectares per 1,000 residents of allotment and community garden space.

Local Plan Policy H11 sets out the external communal outdoor space requirements for residential development. Where site allocations are required to deliver publicly accessible green space, this should be in addition to the requirement to deliver external communal amenity space.

Local Plan Policy D2 sets out the public realm requirements for a development. Policy GWS1 and D2 are complementary and must be considered together.

Early consideration of green space

The Green and Water Infrastructure Strategy (2025) should be consulted early in the preparation of an application, ideally before the pre-application stage, so that it can inform the design of the scheme. Applicants are expected to design green infrastructure into the scheme from the earliest possible stage. Green space is integral to the success of a development and should not be seen as an 'add on' at the end of the design process. Consideration of green infrastructure opportunities from the outset requires developments to make green space a central part of masterplanning, in line with Local Plan Policy BFN2. More guidance on ways to incorporate urban greening and deliver green links is provided in the Green and Water Infrastructure Strategy (2025).

Urban greening can include features such as street or balcony planters, roof gardens, podiums and green walls.

GWS1.1

Taking an integrated approach

Major development proposals should demonstrate in a Design and Access Statement how the scheme takes an integrated approach to green infrastructure. Taking an integrated approach to green infrastructure means considering the site in its wider green infrastructure context and considering how the site can optimise existing natural and green assets, through improving their size or functionality or connectivity and address any shortfalls in the types of green infrastructure in the site and wider area.

Schemes which impact existing green space and/or provide new green space should provide to the Council and Greenspace Information for Greater London CIC compatible data on the existing and proposed landscaping elements.

- Space type and the size of each green space provision (based on Greenspace Information for Greater London CIC typologies),
- Details of any access restrictions (unrestricted, limited and restricted) including overnight closures,
- Living building features (including green roofs),
- Water space (see Local Plan Policy GWS2),
- Public realm – hard landscaping,
- Site facilities e.g. play spaces, benches, drinking fountains,
- Site owner and manager.

Information on data standards can be found on the Greenspace Information for Greater London CIC website: https://www.gigl.org.uk/recording-surveying/links-and-resources/survey-data-standards-and-guidance/.

Please also see Natural England's Green Infrastructure Framework (GIF), in particular the Green Infrastructure Planning and Design Guide: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx

GWS1.2

Surplus to current and future needs

An assessment should follow Sport England's latest Playing Pitch Strategy guidance or an alternative methodology acceptable to Sport England. The assessment of need should provide a robust and carefully documented assessment of the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision.

Ancillary facilities

The provision of new or enhanced ancillary facilities is supported and encouraged. They can play an important role in helping people to become and stay active as well as improving the use and viability of the playing field for sport. Facilities should be of an appropriate scale and are encouraged to comply with relevant Sport England and national governing bodies of sport design guidance. They should have no significant detrimental impact on the principal use of the site as a playing field and its ability to accommodate playing pitches.

Affecting land incapable of forming a playing pitch

The development of minor parts of a site unsuitable for playing pitches (e.g. frontage or steep sloping land) can sometimes provide a way to enhance its sporting use. However, the development should only affect only land incapable of forming part of a playing pitch and it should not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any part of a playing field and any of its playing pitches.

GWS1.2	**Replacement playing field** Where a replacement area of playing field and associated facilities can be provided which are equivalent or better than the existing area of playing field and its facilities, it may be beneficial to sport to take this opportunity. The new area of playing field should be: • of equivalent or better quality, and of equivalent or greater quantity, and • in a suitable location, and • subject to equivalent or better accessibility and management arrangements. **Benefit the development of sporting use** There may be occasions when the development of a new or extended indoor or outdoor facility for sport, which is to be fully or partly located on an area of playing field, can be judged to be sufficiently beneficial to the development of sport in the local area as to outweigh the detriment caused by the loss of the area playing field, or the impact on the use of the remaining playing field or pitches. The potential benefit of any new or extended sports facility may include whether the facility: • meets an identified local or strategic need, as set out in the Playing Pitch Strategy (2025) and/or a sports national governing body strategy (rather than duplicating existing provision); • fully secures sport-related benefits for the local community; • helps to meet identified sports development priorities • complies with relevant Sport England and national governing bodies of sport design guidance; • improves the delivery of sport and physical education on school sites; and • is accessible by alternative transport modes to the car.

GWS1.2	Please see Sport England's Playing Fields Policy and Guidance (2018) for further details. A Social Value Health Impact Assessment (see Local Plan Policy BFN3) is needed to support any application for a loss, reduction, replacement, reconfiguration or relocation of a playing pitch.
GWS1.3	For applications on, or impacting Metropolitan Open Land (MOL) or Green Belt please refer to GWS1.1. For applications on, or impacting playing pitches please refer to GWS1.2. It is important that everyone living in Newham has the opportunity to access green space within walking distance from their home. This is a key part of delivering a network of well-connected neighbourhoods. For the purpose of this Local Plan, the scale of a 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

GWS1.3

An application which increases the severity or extends an area of publicly accessible green space deficiency, at any of the above scales, will not be permitted. It is important to realise that it is not acceptable to offset different scales of open space. For example, an application which will see an increase in Pocket Park deficiency, in a location where there is an excess of space at the District Park scale would not be permitted. These two spaces provide different experiences and meet different user needs.

In the first instance replacement green space should be provided on site. If this is not possible, replacement space should be directed to the development's existing well-connected neighbourhood. Only when this is not possible should space be provided in another part of Newham. If replacement space must be provided outside of the development's well-connected neighbourhood it must be directed to an area experiencing green space deficiency. To demonstrate the acceptable location of proposed replacement off-site green space development, proposals must include the submission of up-to-date spatial mapping of the 15 minute green space network. This mapping exercise must identify the development site location in the context of the replacement green space 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 replacement site in relation to the existing green space.

In all cases, proposals must demonstrate that loss of green space has been minimised through a design-led approach, retaining the maximum feasible quantity of green space. Any reduction in area will only be acceptable where there is no reduction in the overall usability, accessibility, recreational or ecological function of the space, and where the replacement provides functionality and quality that is equivalent to or better than the existing provision.

GWS1.3

Many of Newham's housing estates include areas of communal amenity green space with limited function. Maximising the range of benefits this green space provides has the potential to improve the function and overall resilience of the borough's green infrastructure. Key interventions may include, but are not limited to:

- improving habitat for wildlife to improve access to nature,
- transformation of underused areas of hard surface to create new communal green space,
- structural planting to provide a barrier to air and noise pollution,
- planting trees and other vegetation to create cool, quiet spaces,
- rain gardens to store and release storm water run-off,
- community food-growing areas.

Changes to the existing green space on housing estates will need in-depth consultation with residents and should respect the role of the existing landscape to provide privacy and amenity space for residents.

It will only be appropriate to allow a net loss of green space where it can be demonstrated that it will lead to the provision of facilities that will improve the way people can use and enjoy a green space. Suitable enhancements may include, but are not limited to: drinking fountains, cafes, public toilets, art, and interventions to improve nature interpretation or to enhance historical features, outdoor play, and fitness equipment. Importantly, any such additions should not have a negative impact on wildlife and biodiversity.

The development or enhancement of existing outdoor sport and/or recreational facilities on green space must be for green space dependent uses and, should be of an appropriate scale and be developed in accordance with Local Plan Policies SI2 and SI3.
Green space dependant uses can include, but are not limited to sports pitches, outdoor classrooms or cultural uses such as an amphitheatre.

GWS1.3	Please also see Natural England's Green Infrastructure Framework (GIF), in particular the Green Infrastructure Planning and Design Guide.
GWS1.4	We will always seek new publicly accessible local park (2 ha), where space allows. However, the creation of small open spaces (under 2ha), pocket parks (under 0.4 ha) and opportunities for urban greening throughout the borough is of equal importance. These spaces provide a patchwork of green stepping stones to complement our larger green spaces. Examples include, but are not limited to: • the development of new pocket parks to serve the needs of existing well-connected neighbourhoods where there is a lack of local open space and in locations where people do not have access to private gardens, • underutilised spaces, such as surface level car parks and left-over land parcels should, wherever possible, be repurposed to provide open space and/or local community / food growing opportunities, • the creation of new publicly accessible roof gardens, with community/food growing opportunities, where space at ground level is especially limited. Applicants should refer to the priorities and green space needs set out in Newham's Green and Water Infrastructure Strategy (2025). New open space should normally be provided as publicly accessible green space. New or improved hard landscaped public space, such as a public square, may be considered appropriate in certain high footfall areas. This will be assessed on a case-by-case basis. Where green space is not possible, development should maximise urban greening features such as planting and permeable paving.

GWS1.4	Development must consider the following principles when improving existing or delivering new green space: **High quality and welcoming** • be distinctive and welcoming – encouraging people to stay, • be distinctive and designed to create a 'public welcome' and promote access for all, encouraging people to stay, • be designed and managed to meet diverse and changing needs of Newham's population, • address the particular needs of existing and emerging local community, • provide free to-access and accessible places to sit, designed to promote social interaction and informal eating and meeting, • deliver a place that is inclusive of all genders and protected characteristics, • be designed for effective management and maintenance, • have clear entry points with signage, which is attractive, clear, and well located, • be overlooked, • avoid rigid boundaries, where it is safe to do so, by blurring the boundaries between park and built environment, by greening the public realm surrounding parks and creating more seamless transitions between park and street, • provide generous seating and social space for children, young people, and adults, including provision of seating in the shade, • provide shade, shelter, and lighting suitable to the local environment, • meet the GLA Cool Spaces criteria, including but not limited to providing public toilets or clear signage to nearby facilities and access to free drinking water, • be capable of changing and evolving over time;

GWS1.4

Co-designed

- be co-designed with residents from the outset. Designs should be sensitive to any existing function of green spaces,
- co-design should include activities to target population groups who are least often heard by the council, who use green spaces least, or who have specific needs. This may include children and young people, older people, disabled people, or other groups,
- meaningful, inclusive, and diverse co-design can help ensure spaces achieve their intended outcomes, meet the needs of those who use them, and improve equity of access, with subsequent benefits to health inequalities;

Connectivity

- deliver an improved network of green grid links in line with the Green and Water Infrastructure Strategy (2025) to enhance access to key destination points (town centres, community facilities and publicly accessible green spaces) and to and along water spaces,
- create/improve links with other green infrastructure and permeability with the wider area, be located on safe routes and minimise the number of crossings to access them,
- provide ecological corridors for wildlife,
- provide clear wayfinding / signage,
- improve habitat for wildlife,
- cycle and pushchair storage;

Climate emergency

- increase sustainability benefits, including urban cooling, provide shading and sustainable drainage, including the use of permeable surfaces and use of sustainable materials,
- consider the suitability of the planting for the climate – thinking about drought impact, waterlogging and the potential for warmer and wetter winters and hotter summers,
- rising temperatures caused by climate change is leading to longer allergy seasons and worsen air quality. Species selection should take this into account and seek to mitigate this impact;

GWS1.4

Biodiversity (see also Local Plan Policy GWS3)

- maximise biodiversity benefits and access to nature, by incorporating areas of biodiversity that complements, and where possible provides links to, the surrounding habitats,
- increase the structural and species diversity of vegetation;
- provide trees, bushes and other plants which will thrive in the local conditions, will attract wildlife, provide interest, shade and where appropriate species which provide berries for birds,
- maximise the inclusion of plants for pollinators and beneficial insects (with year-round benefits);

Air quality (see also Local Plan Policy CE6)

- mitigate the impact of air pollution by following the guidance in the Greater London Authority publication: Using Green Infrastructure to Protect People from Air Pollution (2019);

Sustainable Urban Drainage Systems (see also Local Plan Policy CE8)

- maximise opportunities to reduce the adverse impacts of traditional surface water systems; remove pollutants from urban run-off at source; and to combine surface water management with green space for amenity, recreation and wildlife benefit;

Play and informal recreation (see also Local Plan Policy GWS5)

- accommodate and encourage physical activity for all, promoting walking, cycling and social interaction,
- provide shade and shelter,
- provide features for socialising (seating, gathering places),
- provide opportunities for the space to be used flexibly for different purposes / events,
- consider informal sports facilities (ball courts, wheeled sports facilities),
- provide free Wi-Fi and spaces for sitting and places to study,
- maximise the range and inclusivity of play, including:
  - fixed play opportunities,
  - non-prescriptive play features (for example: boulders, hillocks, logs, trails, sand, water, loose play material and objects),

GWS1.4	• provide suitable lighting. This is particularly important for the accessibility of outdoor sports facilities. The form of lighting will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding area, and not to cause a demonstrable harm to the local community or biodiversity. The hours of use of lighting should be agreed early in the planning process; **Community /food growing** • maximise opportunities to provide and improve access to community and food growing spaces; **Dogs** • where space allows, the provision of areas for dogs to be off-lead separated from other park users and activities.
GWS1.5	Management Plans and agreed uses should be considered at the early stages of a project and should be informed by an understanding of the site and the awareness of any long-term capital funding required for the governance and maintenance of the proposal. Management should enable lasting flexibility of use and continued access to shared and communal spaces. Where it is agreed that the publicly accessible green space will not be adopted a Maintenance and Management Strategy will be secured to ensure the long-term and suitable maintenance and management of the site and its infrastructure Commitment to Public London Charter will be secured where delivering new publicly accessible green space that is privately owned and managed.

Evidence base

- Green and Water Infrastructure Strategy, Arkwood with London Wildlife Trust (2025)
- Newham Metropolitan Open Land Review (2025)
- Newham Sites of Importance for Nature Conservation Review (2025)
- Newham Playing Pitch Strategy, KKP (2025)
- Greenspace Information for Greater London CIC data records.
- Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2022)
- Air Quality Action Plan 2019 – 2024, Newham (2019)
- Climate Emergency Action Plan, Newham (2020)
- Public London Charter, GLA (2021)
- Cool Spaces Criteria, GLA (2023)
- Using Green Infrastructure to Protect People from Air Pollution, GLA (2019)
- Green Infrastructure Framework – Principles and Standards for England, Natural England (2023)

Policy Links

Local Plan:

- GWS3: Biodiversity, urban greening, and access to nature
- GWS5: Play and informal recreation for all ages
- CE6: Air quality
- CE8: Sustainable drainage
- Section 4: Neighbourhoods

London Plan 2021:

- G1: Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open space
- G5 Urban greening
- G5 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- S5 Sports and recreation facilities
- SI1 Improving air quality
- SI4 Managing heat risk
- SI13 Sustainable urban drainage

Policy GWS2: Water spaces

1. Development should provide or help to deliver a network of improved, high-quality water spaces. This will be achieved through:
    a. protecting and, where possible, enhancing all existing water spaces; and
    b. supporting the aims of the European Union Water Framework Directive, Thames River Basin Management Plan, Thames Estuary 2100 Plan, Thames Vision, Royal Docks and Beckton Riverside Integrated Water Management Strategy and the South East Marine Plan.

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); 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
    d. generally requiring no encroachment or covering of any water space unless it is 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
    e. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and
    f. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and
    g. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and
    h. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and
    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
    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.

Justification

3.219 Newham has a unique set of water infrastructure that includes the Thames and two of its major tributaries (the Lea and Roding) and an extensive area of repurposed dock infrastructure that is now a significant focus for regeneration.

3.220 The borough's waterways provide habitats for wildlife, help mitigate the urban heat island effect as well as offering unique views of water that gives the borough its specific identity. Newham's rivers and docks add significantly to the borough's biodiversity capacity and provide unique habitat opportunities (particularly in the tidal and inter-tidal areas of rivers). Newham's water infrastructure assets all function as wildlife corridors, connecting different parts of the borough and to a broader green and water infrastructure hinterland beyond the borough boundary.

3.221 Newham's waterways also provide significant and unique opportunities for leisure uses and activities both on and around the water. Access to water infrastructure can enhance physical and mental health and wellbeing by providing capacity for active and passive recreation and by providing physical space (contrasting with adjoining densely developed urban areas).

3.222 The different attributes of Newham's water spaces need to be balanced with the intrinsic natural value of the waterways.

3.223 Our rivers and docks present some of the most exciting opportunities to increase access to nature and to deliver improvements to biodiversity. Better connections in the walking environment along the rivers Roding, Lea, Thames and the Royal Docks would be transformative for those living in Newham.

3.224 Restoring, preserving and protecting our water environments can also increase connectivity between habitats and provide avenues for species to alter their distribution in response to climate change. With urban environments set to get hotter water spaces can provide a vital cooling effect and contribute to managing surface water run-off.

3.225 It is therefore important to protect our valuable water spaces and seek to deliver improvements to public access, enhance biodiversity, to promote appropriate water-related and water-dependent recreation and to deliver high quality design to celebrate and recognise better the industrial heritage of our water spaces.

Implementation

ALL	For the purposes of the Local Plan, water space is defined as outdoor environments within an urban area (either natural or man-made) that prominently feature water, either public or private ownership, which can have unrestricted access, partially-restricted access or restricted access. In Newham this can include: • rivers (River Thames, River Roding and River Lea) and streams, • lakes and ponds, • docks (Royal Albert, Royal Victoria and King George V).
GWS2.1	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. 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.

GWS2.1	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 the GLA and the Environment Agency), landowners and the community.
GWS2.2	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. The Green and Water Strategy (2025) identifies opportunities to enhance 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. The delivery of these sites will be shaped through co-designed masterplanning in accordance with Policy BFN2 which may demonstrate that an alternative approaches to improving the functionality, connectivity, quality, and accessibility of existing water spaces could deliver outcomes consistent with the allocation policy and other policies in the Plan. Development must consider the following, to ensure high-quality water spaces are delivered: **Functionality** • 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. **Connectivity** • 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,
GWS2.2	• 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.

GWS2.2

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 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.

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.

Openness

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

GWS2.2

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 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.

GWS2.2	**Safety** • 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. • 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. • 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 Drowning Prevention Strategy (2019) provides practical steps to be taken to improve water safety.
GWS2.3	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. 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. 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.

GWS2.3	The Built Leisure Needs Assessment (2025) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. Water related or water-dependent uses 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.
GWS2.4	We will work in partnership with the Port of London Authority and the Canal and River Trust, RoDMA, the Environment Agency, the GLA and other appropriate authorities and stakeholders, to determine the suitability of residential and visitor moorings. In coming to a decision, we will with consider: • Navigation, • Water quality, • Biodiversity, • Openness and character of the water space and surrounding area, • Surrounding residential amenity, • The adequate provision of supporting uses and facilities, including: - Waste management (for example rubbish and sewage disposal) - Supply of adequate electricity including for heating (see Local Plan Policy CE6) - Supply of fresh water - Provide access which meets the needs of all, with consideration given to children, older people and those with reduced mobility.

Evidence base

- Green and Water Infrastructure Strategy, Arkwood with London Wildlife Trust (2025)
- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Built Leisure Facilities Needs Assessment, Strategic Leisure (2025)
- Newham Sustainable drainage design and evaluation guide (2020)
- TE2100 Plan, Environment Agency
- Emerging Lea Valley Strategic Integrated Water Management Strategy
- Emerging (Sub-regional and Local) Integrated Water Management Strategies (Greater London Authority)
- Emerging Riverside Strategy (Royal Docks Team, Greater London Authority, Environment Agency)
- Drowning Prevention Strategy, Port of London Authority (2019)

Policy Links

Local Plan:

- GWS3: Biodiversity, urban greening, and access to nature
- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage
- Section 4: Neighbourhoods

London Plan 2021:

- S14 Waterways – strategic role
- S16 Waterways – use and enjoyment
- S17 Protecting and enhancing London's waterways
- SI4 Managing heat risk
- SI1 Improving air quality
- SI13 Sustainable urban drainage
- G5 Biodiversity and access to nature
- S5 Sports and recreation facilities



Policy GWS3: Biodiversity, urban greening, and access to nature

1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity (green and water). This will be achieved through:
    a. protecting existing habitats and features of biodiversity value. If this is not possible, replacing lost features within the development site, delivering improved biodiversity value; and
    b. maximising improvements to existing habitats including:
        i. the most valuable habitats within existing Sites of Importance for Nature Conservation; and
        ii. the network of green and water corridors; and
        iii. creating new wildlife habitats in the borough's larger green spaces to supplement those within the existing Sites of Importance for Nature Conservation network; and
    c. maximising opportunities to create new onsite habitats and to deliver missing ecological links (green and water); and
    d. maximising 'living building' elements as a key feature of the site and building design. Appropriate, site considered opportunities should be integral to the design of a development from the outset; and
    e. maximising biodiversity measures within the London City Airport Safeguarded Area, whilst also ensuring that the airport is appropriately safeguarded from bird strikes; and
    f. demonstrating, through a Management Plan, how existing and new areas of biodiversity value will be funded and maintained.

2. Major development irrespective of location, and all development in close proximity to a Site of Importance for Nature Conservation or which is likely to have an impact on protected or a priority species or habitat is required to submit an ecological assessment. Data recorded on the habitat(s) (type and size) and species present currently on site and data on the size and type of green space and 'living building' features proposed should be shared with the Council and Greenspace Information for Greater London Community Interest Company (GiGL).

3. Development in areas deficient in access to nature should deliver new or improved green or water spaces which have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation. Where this is not possible development should deliver:
    a. habitat creation onsite and/or in locations accessible to residents and the wider public; and
    b. environmental interpretation materials to provoke curiosity and provide information on the green and water space on site and in the wider neighbourhood; and
    c. improved walking routes and access to nearby accessible Site of Importance for Nature Conservation.

4. Development must deliver a Biodiversity Net Gain of at least 10 per cent. All opportunities should be explored to deliver Biodiversity Net Gain on-site. Where it can be demonstrated that on-site net gain is not possible, applicants must seek to deliver their off-site Biodiversity Net Gain in Newham. Out of borough registered off site Biodiversity Net Gain will only be accepted where it can be demonstrated there are insufficient sites and credit schemes in Newham to deliver the required net gain.

5. Development should meet the London Plan (2021) Urban Greening Factor.

6. Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
    a. avoid damaging the significant ecological features of the site,
    b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site,
    c. deliver off-site compensation, in Newham, of better biodiversity value,

d. where appropriate compensation is not possible, planning permission will be refused.

7. The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through:
   a. developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and
   b. developments of new net additional residential homes contributing to the delivery of Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy.

Planning obligations

- Funding for delivering or monitoring Biodiversity Net Gain will be secured.
- Contributions towards Epping Forest Mitigation will be secured where required to mitigate the impact of development.

Justification

3.226 As an urban borough, Newham's network of natural spaces act as a green lung; protecting biodiversity by giving much needed space for wildlife (animals, birds, trees, plants, insects and fungi) and as well as reducing air pollution, helping water management and moderating urban temperatures. Having a biodiverse borough means having a rich mix of plants and animals; and this variety and complexity helps nature to thrive.

3.227 As the number of homes increases over the Plan period, it will be of fundamental importance to match this growth by protecting and improving existing natural spaces (both green and water) and increasing the amount of habitat creation and through ecologically sensitive landscape design within the urban environment.

3.228 The provision of urban greening through new developments and on existing streets will provide benefits to wildlife and people living in Newham. Whilst this may not provide space for recreation, such greening can improve people's mental health and well-being, enhance the character of the townscape, and provide opportunities for community and food growing.

3.229 Green corridors (connecting habitat for wildlife) can significantly improve the capacity of existing parks and nature conservation areas by extending their reach beyond their current boundaries. The provision of green corridors to provide access to existing parks and green spaces via safe and less polluted routes will also help people to access the existing network of green spaces.

3.230 Located outside the borough to the north of Manor Park, Epping Forest is the largest green space in London. The Forest is formed of ancient woodland and acid grasslands which cover an area of approximately 2,450 hectares. Two thirds of Epping Forest has been designated as a Site of Special Scientific Interest and a Special Area of Conservation. Epping Forest is a popular visitor destination, including for Newham residents. The rise in visitor numbers to Epping Forest from the surrounding area has led to a need to better balance the ecological needs of Epping Forest. Newham has been working with the City of London and neighbouring authorities in London and Essex to develop a joint governance and delivery approach to the Strategic Access Management and Monitoring Strategy.



Implementation

GWS3.1

The ecological value of existing Sites of Importance for Nature Conservation is maximised when they are connected by areas of complementary or supporting habitats in the form of green corridors or 'stepping-stones'. This is habitat that allows some species to move through the urban environment. This supporting habitat also provides wildlife with a wider range of opportunities for meeting their foraging or breeding requirements. Green corridors can be created and improved by:

- creating pockets of wildlife habitat between existing Sites of Importance for Nature Conservation
- increasing the species and structural diversity of vegetation in parks, amenity green spaces and the public realm to enable a wide variety of species to move between parts of the Sites of Importance for Nature Conservation network.

Living building elements enhance biodiversity, examples of living building elements include, but are not limited to:

- green and brown roofs,
- green walls,
- swift bricks and artificial nest sites,
- roost bricks for bats and designing lighting in a bat friendly way,
- ensuring boundaries allow hedgehogs to move freely,
- nature based Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscape form and vegetation.

Living building features should be specified in accordance with best-practice guidance. This is available from BS 42021:2022 and from Chartered Institute of Ecology and Environmental Management (CIEEM).

GWS3.2

Applicants should carry out proportionate ecological assessments for major developments, and all development in close proximity to a Site of Importance for Nature Conservation, or for any proposed development which is likely to have an impact on a protected or priority species or habitat, as listed in Section 41 of the Natural Environment and Rural Communities Act. Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. It is important to recognise that priority species and habitats may include building-based biodiversity.

Ecological assessments must be developed from the earliest stages of the pre-application process and should demonstrate as a minimum how the natural resource will be retained, enhanced and if necessary restored. The requirement for ecological surveys and assessments to be submitted in this policy also applies to refurbishment works which may impact species using the existing building, such as swifts or bats. The scale and detail of the survey will be dependent on the likely impact on biodiversity.

The ecology assessment should include:

- information assessing the characteristics and situation of the site; and details on how the proposals will protect, replace and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species.

The ecological assessment should provide to the Council and Greenspace Information for Greater London CIC compatible data on the following:

- space type and the size of each provision (based on Greenspace Information for Greater London CIC typologies),

GWS3.2	• details of any access restrictions (unrestricted, limited and restricted) including overnight closures, • water space, • site owner and manager. Information on data standards can be found on the Greenspace Information for Greater London CIC website: https://www.gigl.org.uk/recording-surveying/links-and-resources/survey-data-standards-and-guidance/ Ecological surveys to inform the ecological assessment must identify potential development impacts likely to harm the ecology of the site and recommend mitigation and enhancement measures. Where a survey is required, this must occur early in the design process of a proposal and be undertaken by an appropriately qualified ecologist.
GWS3.3	Newham's Green and Water Infrastructure Strategy (2025) shows those areas of the borough that are currently under-provided with natural and semi-natural greenspace and Sites of Importance for Nature Conservation. This is known as an area in deficiency of access to nature and they are also mapped on the policies map. They are defined as those parts of Newham where residents do not have adequate access to the natural environment as they live more than more than one kilometre from an accessible borough Site of Importance for Nature Conservation. When bringing forward development in these areas of deficiency applicants should consider whether, through on-site habitat creation and/or ecological improvement of an existing green space, areas of natural greenspace can be established which would meet borough Site of Importance for Nature Conservation criteria.

GWS3.3	Where this is not possible development should include green links and routes through to allow residents to access the wider network of Sites of Importance for Nature Conservation and greenspaces. On-site interpretation boards, to show how habitats contribute to and support the wider biodiversity aspirations of the borough, and visible onsite features such as bird boxes and wildflower planting can help engage local communities positively in new developments. Interpretation boards can ensure best use of green and water spaces; and can help to foster a sense of local pride by helping people to visualise the meaning and significance of new habitats within developments. Interpretation boards should be designed to be accessible (e.g. for visual/hearing impairments, considering reading age, language barriers and use of visuals).
GWS3.4	Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Development proposals must secure a net gain in biodiversity value, with a clear priority for on-site measures. Development should use the latest Department for Environment, Food & Rural Affairs metric to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation. The assessment should be undertaken by a suitably qualified and/or experienced egologist and should be submitted together with baseline and proposed habitat mapping in a digital format with the application. Any off-site habitats created should be provided in the borough and be located to maximise opportunities for local nature recovery and to improve access to nature. Biodiversity Net Gain should not be applied to irreplaceable habitats. Any mitigation and/or compensation requirements for designated sites should be dealt with separately to Biodiversity Net Gain provision.

GWS3.4	Applicants should refer to the latest government legislation and guidance and the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to ensure proposed green infrastructure achieves a Biodiversity Net Gain. Please also see Natural England's Green Infrastructure Framework (GIF). The GI Framework provides a number of tool and guides to complement the mandatory mechanisms of Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), which form part of the Environment Act.
GWS3.5	London Plan Policy 2021 G5 requires all major developments to include urban greening as a fundamental element of site and building design. The policy introduces the use of an Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application. Applicants for major development should use the London Plan Guidance Urban Greening Factor (2023), or subsequent updates, to ensure proposals meet the requirements of London Plan 2021 Policy G5. The guide provides information to help applicants to apply the UGF to proposed developments.
GWS3.6	Newham's Green and Water Infrastructure Strategy (2025) shows those areas of the borough that are currently under-provided with natural and semi-natural greenspace and Sites of Importance for Nature Conservation. This is known as an area in deficiency of access to nature. Newham's Sites of Importance for Nature Conservation are also mapped on the policies map and detailed in Newham Sites of Importance for Nature Conservation Review (2025)



GWS3.7

Under the Conservation of Species and Habitats Regulations 2017Newham has duties to ensure that planning decisions do not result in adverse effects on the Special Area of Conservation.

The Habitats Regulations Assessment element of the Local Plan Integrated Impact Assessment has considered the impact of the growth proposed in this plan, along and in combination with other Plans.

The need for Mitigation Strategies adopted by the Council to offset the effects of recreational pressure on Epping Forest Special Area of Conservation have been identified. These strategies will be reviewed and updated as required over the plan period. Currently the Council is working with partners to develop a package of mitigation measures which fall into two categories:

- Strategic Access Monitoring and Management Strategy, which was adopted by Cabinet in July 2022.
- Newham Special Area of Conservation Recreation Mitigation Strategy (2025).

Evidence base

- Green and Water Infrastructure Strategy, Arkwood with London Wildlife Trust (2025)
- Newham Metropolitan Open Land Review (2025)
- Newham Sites of Importance for Nature Conservation Review (2025)
- Greenspace Information for Greater London CIC data records.
- Biodiversity Metric, DEFRA/ Natural England
- Biodiversity Net Gain: Good Practice Principles for Development. A Practical Guide, CIRIA/CIEEM/IEMA (2016)
- Urban Greening Factor London Plan Guidance, Greater London Authority (2023)
- Urban Greening for Biodiversity Net Gain: A Design Guide (2021)
- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Air Quality Action Plan 2019 – 2024, Newham (2019)
- Climate Emergency Action Plan, Newham (2020)
- Nature Conservation in Newham, Ecology Handbook, 17, London Ecology Unit (1998)
- Lee Valley Regional Park, Landscape Character Assessment and Landscape Strategy, LUC (2019)
- All London Green Grid: River Roding and Epping Forest Area Framework, GLA (2012)
- All London Green Grid: Lea Valley and Finchley Ridge Area Framework, GLA (2012)
- Cody Dock Tidal Lea Ecology Report 2021 – 22, Gasworks Dock Partnership (2022)
- Newham's Biodiversity Action Plan, LUC (2010)
- Green Infrastructure Framework – Principles and Standards for England, Natural England (2023)
- Lee Valley Regional Park, Biodiversity Action Plan, 2019 - 2029 (2019)

Policy Links

Local Plan:

- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage

London Plan 2021:

- G5 Urban greening
- G6 Biodiversity and access to nature
- SI1 Improving air quality
- SI4 Managing heat risk
- SI13 Sustainable urban drainage



Policy GWS4: Trees and hedgerows

1. Development should protect and deliver a network of improved tree stock and canopy cover with greater species and age diversity to ensure a healthy, balanced tree population. Over the plan period we will seek to deliver 20 per cent canopy cover in the borough, this will be achieved through:
   a. protecting all trees, including street trees; and
   b. seeking a net increase in trees on all new development sites; and
   c. requiring an arboriculture report at the planning application stage for all new development with trees on or adjacent to the site.

2. In exceptional circumstances, where sufficient evidence is provided to justify their loss, development which requires the removal of trees or hedgerows will only be supported where it:
   a. re-provides an adequate replacement based on the existing value of the tree(s) and/or hedgerow(s) removed on site wherever possible; or
   b. makes appropriate mitigating financial contributions towards local tree and/or hedgerow planting provision.

3. Development should:
   a. safeguard existing trees, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during the demolition and construction phases; and
   b. incorporate additional trees and hedgerows wherever possible, ensuring that any planting in green space and historic landscapes is appropriate and considers the existing character of the space; and
   c. design and plan for appropriate trees and hedgerows from the outset, including consideration of existing and proposed trees, hedgerows and vegetation, bio-security, and appropriate species selection, size, and location; and
   d. provide sufficient space for the crowns and root systems of existing and proposed trees, providing adequate space for their future growth; and
   e. provide suitable growing conditions for new trees; and
   f. ensure that a Tree Management Plan is in place.

Planning Obligations

- Contributions towards off-site tree and/or hedgerow planting may be secured where on-site loss is considered justified.Justification

Justification

3.231 Trees and woodland cover 16 per cent of the borough, this figure is made up of all trees in Newham, which includes those on both private and Council land. The Council's tree stock is made up of 19,697 street trees, 5,548 trees within housing areas and 9,942 trees within parks.

3.232 Trees and woodlands play an important role in Newham. Street trees have long been a feature of urban environments and can help to form green links between the network of parks and green spaces. They add to local amenity, provide a valued connection to nature for people and a habitat for wildlife. The planting of additional trees (especially large canopy trees) will assist in providing shade in hot weather and help to mitigate the impact of climate change. Trees also absorb rainwater and filter noise and air pollution.

3.233 The Mayor of London wants to increase tree canopy cover in London by 10 per cent by 2050. Given the many and varied benefits trees provide, it is important we ensure future development protects the trees we have and wherever possible we take the opportunity to plant more trees. These steps will help

to achieve an increase in Newham's canopy cover and contribute to the extent of London's urban forest (the area of London under the canopy of trees).

3.234 Hedgerows, especially in an urban environment like as Newham, are a simple, space saving, cost-effective green intervention with the potential to alleviate a number of local environmental problems. In urban areas hedgerows contribute to services such as climate regulation, sustainable urban drainage, reducing airborne particulates and atmospheric pollution, whilst providing wildlife habitat. They also improve the aesthetic appearance of the built environment.

Implementation

GWS4.1	We will seek to deliver 20 per cent tree canopy cover over the plan period. To achieve this we will need to ensure that there is a net gain of trees on all Site Allocations, along with undertaking planting projects on Council owned land and where possible private land such as education sites. Major development with trees on or adjacent to the site should undertake an i-Tree study, to be submitted with the planning application.
GWS4.1	An i-Tree study enables the council to understand the existing and ultimate canopy cover. This should then be repeated at the end of the development condition period to show the gains made with the infrastructure planting.
GWS4.2	The development potential of a site should be optimised in a way which does not result in tree or hedgerow loss and loss should only occur when there are no feasible engineering solutions or arboricultural techniques (such as root or canopy pruning) to mitigate any issues. Any application to fell a tree(s) will need to provide suitable evidence to document the reason why the removal of the tree(s) is considered necessary. This should be presented in an arboricultural report which includes: • Images to demonstrate the issue(s), • Decay detection report (where relevant), • Site plan indicating clearly the tree(s) proposed for removal. Major development which proposes to remove a tree(s) must undertake a Capital Asset Value for Amenity Trees (CAVAT) study, to be submitted with the planning application. This is required to understand the financial value of the tree(s). CAVAT is a tool for valuing amenity trees and is used to determine the appropriate level of compensation where trees are damaged or removed and to provide a basis for managing public trees as assets rather than liabilities. In instances where a tree or hedgerow are to be removed there will need to be mitigation for the lost vegetation. This should be through suitable on-site replacement planting. Where we are convinced that replacement trees or hedgerows cannot be incorporated on sites, appropriate financial mitigation will be sought based on the submitted CAVAT study. Should there be an ancient or veteran tree(s) on your site please see the Natural England and the Forestry Commission for additional advice: https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions.
GWS4.3	Careful consideration should be given to the size, species, and location of new trees and hedgerows.

GWS4.3

To ensure best practice is observed, all tree planting should follow BS 8545 (or the latest standard if updated over the course of the Plan period). BS 8545 gives recommendations for transplanting young trees, with a view to achieving their eventual independence in any landscape scheme.

Care should be taken when choosing tree and hedge species to ensure the species chosen best meets the demands of the space (right tree, right place, right reason). When specifying, the Tree Design Action Group publication 'Tree Species Selection for Green Infrastructure: A Guide for Specifiers' should be consulted. Where possible, large canopy trees will be encouraged as they provide a wide range of benefits for biodiversity and urban cooling.

Applications should consider how trees and hedges can be used to improve local air quality (see Local Plan Policy CE6).

Due to the increasing risks posed to the flora and fauna in the UK, planting should be sustainably sourced and where possible grown in the UK. This will reduce carbon emissions from importing plants whilst also reducing the risk of importing pests and diseases into the country. Consideration needs to be given to species diversity when planting to ensure that, should plants be affected by a pest or disease, there will be variation within the species to mitigate the spread and damage caused.

The use of native trees and hedgerow species is supported. However, it is also important to ensure species are suitable for the changing climate and offer resilience to pests and disease through species diversity across the tree inventory of a development site and the borough more broadly.

Where planting can be adequately set back from the road, the use of fruit and nut trees should also be explored to create 'mini' food forests.

GWS4.3

Where possible, utilities should be located within ducts or in a designated area away from planting. This will avoid damage to tree roots if repairs to utilities are required. In addition, it will assist in preventing root damage to the utilities.

Growing space should be considered early on in the design of a scheme to ensure that adequate space is provided to reduce compaction. If possible, cell confinement systems should be used in addition to permeable surfaces. Using cellular confinement systems can be used for ground protection in areas where tree roots might be at risk from soil compaction and where it is unacceptable to dig into the ground to lay a conventional sub-base. Compaction can occur for many reasons but vehicles passing over unreinforced ground are particularly damaging, although repeated foot traffic can also be detrimental to soil structure.

Integration of trees and hedgerow planting early on in landscape plans will achieve the most benefits and it is vital they are given the space to grow above and below the ground.

In instances where trees and hedgerows are planted, a Tree and Hedgerow Management Plan, including maintenance will be secured. This is to ensure that all green infrastructure is established and thriving at the end of the condition period.

Maintenance should include:

- Three years of watering to establish planting (how much will depend on the size of the tree(s) / hedging planted),
- Routine visits to weed,
- Formative pruning,
- Loosening ties/guards,
- Eventual removal stakes/ties.

Evidence base

- Green and Water Spaces Infrastructure Strategy, Arkwood with London Wildlife Trust (2025)
- Characterisation Study, Maccreanor Lavington with New Practice, Avison Young and GHPA (2024)
- Air Quality Action Plan 2019 – 2024, Newham (2019)
- Climate Emergency Action Plan, Newham (2020)
- Natural Green Infrastructure Framework (2023)
- COP15 Global Biodiversity Framework
- GLA GIS database
- Natural England database

Policy Links

Local Plan:

- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage

London Plan 2021:

- G7 Trees and woodlands
- G5 Biodiversity and access to nature
- SI1 Improving air quality
- SI4 Managing heat risk
- SI13 Sustainable urban drainage



Policy GWS5: Play and informal recreation for all ages

1. Development should provide or help to deliver play and informal recreation facilities. This will be achieved through:
    a. protecting existing play and informal recreation facilities. The loss of play and informal recreation facilities will be resisted unless replacement space of equivalent size and functionality is provided either onsite or in the local well-connected neighbourhood, with unrestricted public access.
    b. maximising opportunities to deliver new and improved play and informal recreation facilities, with a particular focus on the locations which will experience the highest level of need over the plan period as set out in the Green and Water Infrastructure Strategy (2025); including delivering the requirements in the site allocations and Local Plan Policies H11 and D2.

2. New play and informal recreation facilities should be designed to meet the needs of Newham's population, be inclusive, accessible and safe, through:
    a. co-production with local adults, children and young people, parents, and carers on the design of new provision early on in the development of an application; and
    b. designing play and informal recreation facilities which are exciting and engaging for all abilities and ages. Facilities should be well-designed, secure, and free to use. It should provide for a range of interests and address barriers to play by tackling issues of inclusion and equity; and
    c. reducing the harm caused by poor air quality through the favourable location of play and informal recreation facilities away from busy roads or other high pollution areas. Where this is not possible, it must be demonstrated, to the Council's satisfaction, that the provision of appropriate mitigation (such as careful layout and choice of soft landscaping) will minimise exposure to pollutants.



Justification

3.235 London is a city with a youthful population and with 0-25 year olds making up 37% of the population, Newham has the highest number of young people anywhere in the country. Having access to stimulating and safe spaces for play and informal recreation is of huge value to the children and young people living in Newham. Providing places in the borough for children and young people, which are not their home or school environment, gives the opportunity for younger people to meet in a space in which they can be independent, feel comfortable, make important social connections, and feel connected to the neighbourhood in which they live. For children and young people, the right to play, to gather and to participate in decisions that influence them, are enshrined in the United Nations' Convention on the Rights of the Child.

3.236 Children have a right to be present and visible in public, shared and communal spaces, and their movement and play should always be regarded as a legitimate activity. Spaces which encourage independent and self-directed play have many benefits. Physical activity through play is closely linked to improving children's physical and mental health.[42]

3.237 Despite our young population, Newham currently has a low level of play and informal recreation space. The borough has 83 publicly accessible playgrounds, with a total area of nine hectares. The Fields in Trust recommends a standard of 0.25 hectares per 1,000 residents for playgrounds. Newham currently falls short of this, with just 0.025 hectares per 1,000 residents, this

[42] Bornat, D. Between Edges and Hedges. Essay: Designing for Play, 2018a

represents a shortfall of 82.34 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard over the plan period will require the creation of 105 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space. These spaces must not be exclusively for those living in new developments but must provide much needed play space to our existing neighbourhoods.

3.238 Well-designed, environmentally friendly, and visually pleasing playground equipment should be an available resource for everyone's benefit at all ages and stages of life. Play and informal recreation spaces can and should also be designed to encourage activity and provide a space for social interaction for adults – who also have a right to play. Playground equipment and informal recreation spaces offer physical, intellectual, emotional and behavioural benefits which transcend age.

3.239 Older adults (over 65), children under 12 and those with certain pre-existing health conditions (e.g. asthma, chronic obstructive pulmonary disease) are most vulnerable to air pollution. Extra care should be taken to separate people and pollution in places such as play and informal recreation facilities, which are used by these vulnerable groups.

Implementation

GWS5.1	In the first instance replacement play space should be provided on site. If this is not possible, replacement space should be directed to the development's 15 minute neighbourhood. To demonstrate the acceptable location of proposed replacement off-site play space development proposals must include the submission of up-to-date spatial mapping of the 15 minute play space network. This mapping exercise must identify the development site location in the context of the replacement play space 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 replacement site in relation to the existing play space. **Delivery of new and improved play space** Areas experiencing play space deficiency are set out in the Green and Water Infrastructure Strategy (2025). The Plan's site allocations give further detail of where new plays space should be delivered to meet local deficiencies. Site allocations should meet the requirement for the quantity and type of play space identified. 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. Local Plan Policy H11 requires play space for residential development to be delivered in accordance with the London Plan 2021. Where a site allocation is required to deliver publicaly accessible play space, this should be in addition to the requirement in Local Plan Policy H11 to deliver external communal play space.

GWS5.1

Local Plan Policy D2 sets out the public realm requirements for development. Local Plan policies H11, GWS5 and D2 are complementary and must be considered together. Policy D2 requires development to deliver improvements to public realm, this could include the delivery of publicly accessible play and it could include making any play space which it is required to be delivered under Local Plan Policy H11 publicly accessible and not just accessible to residents.

Applicants should refer to the mapping and audits of play and informal recreation facilities in the Green and Water Spaces Infrastructure Strategy (2024) to understand if their proposal falls in an area of deficit. This is so that the design of new play space can be best tailored to compliment any existing play space in the surrounding area and to seek to deliver a more complete mix of play space typologies in the neighbourhood. The Strategy has categorised play provision using the Fields in Trust standards which are as follows:

- LAP (Local Area for Play): A small area of open space specifically designated and primarily laid out for very young children to play close to where they live i.e. within one minute's walking time. LAPs are designed to allow for ease of informal observation and supervision and primarily function to encourage informal play and social interaction for toddlers. The LAP requires no play equipment as such, relying more on demonstrative features indicating that play is positively encouraged.
- LEAP (Locally Equipped Area for Play): An area of open space specifically designed and laid out with features including equipment for children who are beginning to play independently. The number and nature of equipment and structures is a matter for local decision, though provision for a minimum number of six play experiences is recommended. Play features including equipment are an integral part of the LEAP and the attractiveness of such spaces, though it is also important that the space can be used for physical activity and games. LEAPs can also include landscaped areas of play; containing little formal equipment but imaginatively designed and contoured, using as far as is possible natural materials such as logs or boulders which create an attractive setting for play.
- NEAP (Neighbourhood Equipped Area of Play): This is an area of open space specifically designated, laid out and equipped mainly for older children but potentially with play opportunities for younger children as well. It can provide play equipment and a hard surface area for ball games or wheeled activities such as roller skating or cycling. It may provide other facilities such as a ramp for skateboarding, a rebound wall, and a shelter for meeting and socialising. NEAPs can often be combined with LEAP provision.

GWS5.2

Play and informal recreation facilities are an important element of a successful 15 minute neighbourhood. It is important such spaces are accessible, be inclusive, accessible and safe. To determine this, when assessing schemes the following questions will be considered:[43]

- Can a child/young person walk or cycle to and from the provision alone?
- Will children and young people feel welcome and able to play in public and communal spaces?
- What proportion of outside space is car-free, well overlooked and directly accessible from residential developments?
- Do children and young people have a high level of input into decision making regarding the built environment?
- Does the environment create conditions for children and young people to be outside after dark?

[43] Adapted from: Greater London Authority, 2020 , Making London Child Friendly

GWS5.2

Co-production should be meaningful – weight and status should be given to feelings, opinions and experiences of children and young people, which should enable them to have an impact on policy, design, and development. Engagement should use creative methods to ensure children and young people are stimulated, including online and digital tools. Participation needs to be understood as a long-term process; ensuring post-intervention feedback and analysis means co-creation is not limited to the design of a space, but also its management and iterative changes. The testing of ideas through meanwhile use programmes for spaces to gather early-stage feedback from residents and young people should be considered.

Play and informal recreation facilities should be designed to allow for creative and challenging activities that help all, irrespective of age, to stay in shape mentally and physically. Play space should meet the needs and expectations of the people living or due to be living in the neighbourhood. This means being mindful of different cultural requirements, abilities, ages and gender. Play England, Design for Play should be used to ensure the creation of successful play spaces: https://www.playengland.org.uk/designforplay. In addition, the following design features, which are often overlooked should be considered:

For under 3s

- Provide activities and facilities to enable standing, crawling, climbing, jumping and balancing,
- Give access to sand, water, sound, loose parts/open-ended play, small spaces, and plants.

GWS5.2

For teen-friendly (12+) spaces

- Provide lighting and safety features, art, play spaces for children and adults, study space, places to meet and spaces to relax with friends, and the ability to host music events,
- Access to free Wi-Fi, a place to get food and drink, trees, flowers, nature, and water features.

For adults

- Provide fitness areas, outdoor gym equipment, climbing walls, swings large enough to accommodate adults, parkour and obstacle courses.

Gender differences in how spaces are used and experienced should be considered. In addition to skate parks, BMX tracks, football pitches and MUGAs the design of spaces should consider incorporating more diverse elements such as those listed below:[44]

- Provision of gym bars for hanging on, leaning against, sitting on.
- Gym equipment designed to encourage social interaction.
- Robust hammock swings for older teenagers to meet and spend time with friends.
- Dividing up MUGA space so there is not just a pitch but also less prescriptive space, to give more chance for different types of play. Seating should be designed into the perimeter of the MUGA. Such spaces allow people to choose how to use the space.
- Social Seating – allowing people to speak, circular designs achieve this well.
- Consider innovative ways to provide shelter from rain and/or heat.
- Stages can provide space for performances both formal and informal.
- Spaces for older children to hang out.

[44] Adapted from: Make Space for Girls, What does better look like? https://makespaceforgirls.co.uk/what-does-better-look-like/

GWS5.2 The following indicators demonstrate a play space has been designed to embrace diversity, equality, and inclusion.[45]

- The space should provide freedom to move and allow for a choice of activities. This can include places to retreat to when things are too busy,green spaces and equipment which provides different levels of height and difficulty.
- The space considers independence and access, with provision of accessible facilities, suitable equipment for children with additional support needs. Schemes should think about the accessibility of paths and surfaces, seating and tables.
- The sensory qualities of play spaces have been considered, for example including: things that spin and you can touch, contrasting light and colour and the use of natural materials in place spaces (e.g. sand, planting, long grasses).
- Good play spaces avoid segregating children on the basis of age or ability, and are laid out so that equipment and features can be used by a wide range of children, even allowing different patterns of usage throughout the day or week.

New play and informal recreation facilities should not be 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 for part of any application that includes play or informal recreation facilities. Understanding the air quality constraints of a site as early as possible can benefit the design of a development. The GLA guidance, Using Green Infrastructure to Protect People from Air Pollution (2019), provides best practice on how green infrastructure can reduce exposure to air pollution in an urban environment. Consultation with Newham's Environmental Health Officers is essential.

Evidence base

- Green and Water Spaces Infrastructure Strategy, Jon Sheaff and Associates with London Wildlife Trust (2024)
- Characterisation Study, Maccreanor Lavington with New Practice, Avis and Young, GHPA (2024)
- Built Leisure Facilities Needs Assessment, Strategic Leisure (2025)
- Making London Child-Friendly, Greater London Authority (2020)
- Urban Design Playground. How child-friendly planning and design can save cities, Tim Gill (2021)
- Air Quality Action Plan 2019 – 2024, Newham (2019)
- Using Green Infrastructure to Protect People from Air Pollution, GLA (2019)
- Climate Emergency Action Plan, Newham (2020)

Policy Links

Local Plan:

- CE6: Air quality
- D2: Public realm net gain
- H11: Housing design quality
- Section 4: Neighbourhoods

London Plan 2021:

- S4 Play and informal recreation

[45] Adapted from: Tim Gill, 2021, Urban Design Playground. How child-friendly planning and design can save cities

CLIMATE EMERGENCY

3.240 Ensuring that development can occur in Newham without adversely affecting, and indeed while improving, the health of residents in the borough, the local environment, and the climate itself, is a crucial element of planning. This includes considering how to improve the borough's environment and air quality, reduce emissions which contribute to the climate emergency, mitigate and adapt to impacts of climate change, and minimise and manage the risks of all sources of flooding.

3.241 Historically, Newham's environment has been polluted by heavy industry, leading to contaminated land and groundwater across the borough. Over the past 40 years, development has meant that many sites have been remediated or capped. However, the legacy of historical industrial use remains in many parts of the borough. These historic industrial uses, as well as major roads passing through the area, has led to a poor quality environment in many parts of the borough.

3.242 One in seven of Newham's population are exposed to levels of Nitrogen dioxide (NOx) that is above the UK limit value for human health. On average, Newham residents are also exposed to a level of airborne particulate matter (PM2.5) that is 35 per cent greater than the World Health Organisation guidelines. According to Public Health England, poor air quality in the borough kills an estimated 96 residents every year. Policies to improve air quality in the borough – in conjunction with transport policies – are key in improving the quality of life and the health of residents.

3.243 There is overwhelming scientific consensus that significant climate change is happening. The UK, London and Newham are increasingly affected by extreme weather events including flash flooding and heatwaves, demonstrating the reality of human driven climate change. These policies consider ways to mitigate and adapt to extreme weather events.

3.244 The Climate Change Act 2008 legislates that the UK carbon account for 2050 must be 100 per cent lower than 1990 levels – i.e. the UK must be net zero carbon by 2050. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045. In 2023, Newham Council became the first local authority in the UK to publish a Just Transition Plan. Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.

This section contains the following policies:

- **CE1: Environmental design and delivery**
- **CE2: Zero Carbon development**
- **CE3: Embodied carbon and the circular economy**
- **CE4: Overheating**
- **CE5: Retrofit and the circular economy**
- **CE6: Air quality**
- **CE7: Managing flood risk**
- **CE8: Sustainable drainage**



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Policy CE1: Environmental design and delivery

1. All development must address the climate emergency throughout its design, construction, operation and lifetime of a building, including considering the likelihood of consequential extreme weather events, increased water scarcity and warmer temperatures.

2. Development should be resource-efficient, minimising consumption and waste throughout the lifecycle of a building.

3. Development should remediate contaminated land and address groundwater pollution.

4. Development should help to improve environment degradation in the borough (such as poor water quality and habitat loss).

5. All development will incorporate water efficiency measures to achieve a consumption target of 105 litres or less per head per day for residential or 'excellent' Wat 01 rating for non-residential development.

Justification

3.245 This policy sets out key principles to support Newham's mitigation of and adaption to the Climate Crisis, in light of Newham's declaration of a Climate Emergency, as well as future extreme weather events that will affect Newham.

3.246 In future, it is anticipated that London will experience hotter summers, milder winters, increased periods without rain, increased intensity in rainfall and other extreme weather events. Newham is especially vulnerable to extreme weather events, such as flash flooding and heatwaves due to our geography – including the urban heat island, a lack of green spaces compared to other London boroughs, and its location surrounded by three rivers. When designing schemes, developments must consider these extreme weather events in line with relevant design policies and other policies in this chapter.

3.247 Over the last century, heavy industry in the form of gasworks, chemical works, tanneries, dye works, paint works, distilleries, railways, and docks, combined with domestic refuse tipping, has left Newham with a legacy of land and water pollution. Most of this affected land, and associated groundwater, is located adjacent to the Lower Lea Valley and south of the A13 in the Royal Docks and Beckton.

3.248 Over the last 40 years, as development has occurred across Newham, many sites have been remediated or capped. However, the legacy of historical industrial use remains in many parts of the borough, notably in the Lower Lea Valley, Beckton Riverside and the Royal Docks. This includes contaminated land and the remnants of industrial use such as gasholders. Without land remediation and amelioration of environmental degradation prior to development, a site may not be viable or may even be harmful to future residents or occupiers.

3.249 This policy therefore ensures that contaminated land is remediated, environmental degradation is improved and that groundwater pollution is protected against.

3.250 Development should consider resource efficiency in the design, construction, operation and lifetime of a building, as part of addressing the Climate Emergency. The Environment Agency has designated the Thames Water region (of which Newham is part) to be an area of "serious water stress" – where demand exceeds the available supply of water. The warming climate and increased population will put further pressure on the supply of water. Water efficiency across London has improved over the last decade, however the London Plan target of 105 litres or less per head per day is not being achieved. In light of the water stress, this policy therefore seeks to ensure that new development will meet the target of 105 litres or less per head per day, with installation of water efficiency devices.

Implementation

CE1.1	Development should demonstrate how the climate emergency is addressed in the design, construction, and operation of the scheme, including in a Design and Access Statement, Flood Risk Assessment and Overheating Assessment. It is expected that all measures to improve resilience should be passive and not rely on energy intensive solutions, such as air conditioning. Examples of ways that developments can respond to the climate emergency include addressing the risk of overheating in design, through orientation, inclusion of cool spaces, use of materials, overhangs and planting (expanded on in Policy CE4: Overheating); using drought resistant planting and designing a building and its surrounding landscape and townscape for flooding (expanded on in policies CE7 and CE8) Development should also consider the latest available Drainage and Wastewater Management Plan (DWMP), which ensures that drainage infrastructure can cope with the increased intensity of storms.
CE1.2	Development should demonstrate consideration of resource efficiency throughout the life of a building, including in the construction, operation, use, and decommissioning of a building. Examples of ways that developments can consider resource efficiency throughout the life of a building include design choices and choice of materials (expanded on in policies CE3, CE5 and D1), construction (expanded on in Policy CE3), operation (expanded on in Policy CE2) and waste and recycling (expanded on in Policy W2).
CE1.3	Given Newham's complex industrial past, developments are strongly recommended to engage with the Council's Environmental Health team at the earliest possible opportunity, to gain an understanding of any potential land contamination or environmental degradation on site. Where land contamination or environmental degradation is known or suspected, proposals should include adequate investigation of the contamination/degradation. Remedial works should be agreed with the Council prior to the start of development. The protection of controlled waters – such as regulated groundwater and surface water – fall under the remit of the Environment Agency. Proposals on sites situated in a vulnerable groundwater area within Source Protection Zones (SPZs) or on an aquifer must protect the underlying groundwater. This is especially important where the previous land use at the site suggests the potential presence of contamination, or if the proposed land use is potentially contaminative. Groundwater SPZs are mapped on MagicMap. Developments within SPZs must follow the Environment Agency guidance and position statement and should engage with the Environment Agency and any abstraction licence holders at the earliest opportunity to ensure development proposals and construction management plans do not impact groundwater quality. For sites where piled foundations are proposed in a SPZ, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised.

	A desk study and site investigation verification report by a competent person will be required in order to provide confirmation that work has been undertaken in line with best practice. These include (but are not limited to): • London Borough of Newham: Contaminated Land Strategy (2023) • London Borough of Newham: Developing Contaminated Land • LQM/CIEH: Suitable 4 Use Levels • DEFRA: Environmental Protection Act 1990: Part IIa Contaminated Land Statutory Guidance, 2012 • DEFRA and EA: Land Contamination: Risk Management • DEFRA and EA: Land contamination: technical guidance • British Standards: BS 10175:2011+A2:2017: Investigation of potentially contaminated sites – Code of practice • EA: The Environment Agency's approach to groundwater protection, 2018
CE1.4	Development should help to improve environmental degradation in the borough. Examples of how this could be achieved include: • new green space or expanding/improving existing green spaces (expanded in policies GWS1 and GWS3), • improving biodiversity and urban greening (expanded on in Policy GWS3), consideration of design and amenity impacts (expanded on in policies D1 and D7), • improving air quality (expanded on in Policy CE6), and • improving the water quality of rivers and docks (expanded on in Policy GWS2).
CE1.5	Development should be designed to be water efficient and reduce water consumption. Development should demonstrate that water efficiency targets can be met using the Part G Water Efficiency Calculator (Water Research Centre Limited).

CE1.5	Ways to achieve these water efficiency targets include the installation of water efficient fittings, installation of modern appliances (that will also use ultra-low amounts of energy in operation as per Policy CE2), as well as the capture and reuse of water on site. Major developments, and developments that have a high water usage (such as hotels, hostels or student accommodation) should include a grey water and rainwater harvesting system. Where such a system is not feasible, it should be demonstrated why this is the case. Developments that have a high water use should also use management practices to mitigate this high water use, such as reducing the demand for laundry. This could be demonstrated through a hospitality sustainability certification such as Green Key. Thames Water offers financial incentives to developers that achieve evidenced water efficiency targets, with the aim of achieving water neutrality (where the total demand for water is the same after the new development was built, as it was before) for new developments. Applicants should engage with Thames Water at the earliest opportunity regarding water and wastewater, as per Policy W3.



Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- London Borough of Newham: Contaminated Land Strategy (2023)
- Climate Resilience Report for London, Greater London Authority (2023)

Policy Links

Local Plan:

- CE2: Zero Carbon development
- CE3: Embodied carbon and circular economy
- CE4: Overheating
- CE5: Retrofit and circular economy
- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage
- D1: Design standards
- D7: Neighbourliness
- W2: Waste management in developments
- GWS1: Green spaces
- GWS2: Water spaces
- GWS3: Biodiversity, urban greening and access to nature

London Plan 2021:

- GG6: Increasing efficiency and resilience
- SI 2: Minimising greenhouse gas emissions
- SI 5: Water infrastructure



Policy CE2: Zero Carbon development

1. New development should be designed and constructed to be Net Zero Carbon in operation, using as little energy as possible to heat a building over a year, and meeting the following standards:
   a. All new residential units should achieve a space heating demand of less than 20 kWh/m^2 GIA/yr.
   b. All new non-domestic buildings except industrial buildings should achieve a space heating demand of less than 20 kWh/m^2 GIA/yr.
   c. All new industrial buildings should achieve a space heating demand of less than 15 kWh/m^2 GIA/yr.
   d. All other development is encouraged to use as little energy as possible to heat the building.

2. New development should not use fossil fuels for heat or energy, and should meet the following standards:
   a. No new developments should be connected to the gas grid.
   b. Heat should be provided through low carbon sources.
   c. Future heating technologies will be supported if it can be demonstrated that they are low carbon and sustainable.

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^2 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 – 55 kWh/m^2 GIA/yr.
      ii. Offices, Retail, Higher Education Teaching facilities, GP surgeries, Hotels - 55 kWh/m^2 GIA/yr.
      iii. Schools – 65 kWh/m^2 GIA/yr.
      iv. Leisure, warehouses, and light industrial units – 100 kWh/m^2 GIA/yr.
      An additional 20 kWh/m^2 GIA/yr budget is available for warehouses/industrial units that operate for 24 hours a day.
   c. In all cases, a building should use as little as energy as possible.

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 120 kWh/m^2 per building footprint per annum for industrial buildings; and
      ii. at least 80 kWh/m2 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^2 per building footprint per annum for all building types except industrial buildings that are over 21 metres in height
   b. Where it can be sufficiently evidenced that it is not technically possible for the amount of energy generated in a year through onsite renewable energy production to match or exceed the predicted annual energy demand of the building, the applicant should fund renewable energy generation (equivalent to the shortfall) elsewhere in the borough through a cash-in-lieu contribution.

5. New development must demonstrate they are delivering the intended performance approved, and that the 'performance gap' between design and actual in-use energy has been minimised, by:
   a. Demonstrating and committing to the use of an assured performance method (e.g. Passivhaus or AECB) to ensure that the building's operational energy performance will meet the design intentions.
   b. Major developments should monitor their total energy use and renewable energy generation and submit the annual figures to the London Borough of Newham for the first 5 years of operation.

6. Development of sites occupied by existing energy intensive industries subject to the UK Emissions Trading scheme will not be subject to the other policy requirements of Policy CE2 provided that:
    a. New development results in an substantially lower carbon intensity per m^2 GIA/yr over the site; and
    b. at the point of application, a long term decarbonisation strategy, which the Council considers to be suitably ambitious, is in place for the site; and
    c. the proposed development demonstrates consistency with the agreed decarbonisation strategy.

Planning Obligation

- Development should pay an energy monitoring fee, allowing for monitoring of the energy performance of a scheme by the Council.
- Developments will be required to pay an offset payment to fund renewable energy generation if policy requirements cannot be met onsite.

Justification

3.251 In order to meet national, regional, and local climate commitments, we need to be delivering net zero buildings today. We should not be permitting homes that will need to be retrofitted in future. This is in line with the recommendations of the Climate Change Committee, the Low Energy Transformation Initiative (LETI) and the Royal Institute of British Architects (RIBA).

3.252 Operational carbon emissions associated with new buildings that meet current planning policy requirements are still very significant. Newham also has the highest rate of fuel poverty in England, with nearly a fifth of households affected.

3.253 This policy therefore ensures that all new buildings should be designed and built to be net zero carbon in operation. The benefits of net zero buildings are substantial and wide ranging – whether global and national impacts from the reduced use of fossil fuels, regional and local impacts from improved local air quality and individual impacts for residents such as lower energy bills and an improved living environment. It will also allow the Council to meet its Climate Emergency and Air Quality commitments.

3.254 The Climate Change Committee recommends a space heating demand of less than 15-20 kWh/m^2/yr for new homes. This recommendation is also in line with the recommendations of the Royal Institute of British Architects (RIBA), the Low Energy Transformation Initiative (LETI) and the UK Green Building Council. As a dwelling with a low space heating demand loses heat very slowly, it will make it easier for the wider energy system to deliver energy in a flexible way, helping to maximise the contribution from renewable energy and reduce energy costs for residents.

3.255 New buildings cannot continue to burn fossil fuels for heating if the London Borough of Newham is to stay within carbon budgets. Low carbon heat sources are therefore an essential component of a net zero carbon building. Low carbon heat can be produced with electricity or using waste heat sources – several viable technologies are already available, including heat pumps (including air, ground and water source) and direct electric radiators). Electricity can be provided through on-site renewables and through grid electricity, which is becoming increasingly decarbonised. The use of electricity for heating also benefits air quality, as there are no local emissions.

3.256 The Council understands that several fossil fuel heat networks are present in the borough, and they must be decarbonised if we are to achieve our climate change targets. Therefore, connections to existing heat networks will only be permitted where a fully funded decarbonisation plan that will be implemented within the lifetime of the plan has been agreed.

3.257 For new buildings to be compliant with our climate change targets, they need to reduce the amount of energy they use over a year. A building that uses ultra-low amounts of energy will directly reduce energy costs for residents and building occupiers. Energy use can also be measured post-construction, therefore helping to drive down the 'performance gap' which is a significant issue in the construction industry.

3.258 New buildings should contribute to the significant increase in renewable energy generation required between now and 2050. The most robust way to deliver the overall objective to balance total energy use and total renewable energy generation

is for new developments to seek to achieve this balance at the site level. This also has the advantage of generating 'free' electricity close to its point of use, helping to deliver significant energy cost savings for residents and building occupiers, helping with Newham's Just Transition.

3.259 The Climate Change Evidence Base indicates that solar PVs are one of the most effective means of generating onsite renewable energy. We acknowledge there are alternative uses for roof spaces in a dense urban environment, but we are prioritising this use due to the importance of reaching net zero and the ability to deliver better useable greenspace at ground level for use by residents and the public. It is noted that roof space can have multi-functional benefits, with solar PVs installed in combination with smaller elements of green or brown roofs, as well as wildlife habitats (insect hotel, bird boxes etc.) Evidence also shows how the installation of solar PVs can reduce the urban heat island effect, by reducing the build-up of heat in the built environment. When combined with battery energy storage systems, solar PVs can also reduce peak demand on the electricity grid, by allowing energy to be stored and released when demand is highest.

3.260 As outlined by the Climate Change Committee, offsetting must have a very limited and defined role if we are to achieve net zero by 2050. The Climate Change Evidence Base details that mid to high-rise residential blocks compliant with the recommended net zero carbon policies may be unable to fully generate sufficient on-site renewable energy to meet operational annual net zero. Therefore, this policy therefore proposes that the development should pay into the Council's offset fund a sum of money equivalent to funding a PV renewable energy system elsewhere in the borough able to generate the shortfall amount of energy. The Climate Change Evidence Base outlines that this is technically and financially feasible.

3.261 The Council considers that the use of land for solely for renewable energy generation or battery energy storage systems is unlikely to be appropriate, in light of the limited land available in the borough.

3.262 In order for the net zero carbon buildings policy to be effective, it is important that new buildings deliver their intended performance. Unfortunately, the actual energy performance of buildings often fails to meet the design standard. This difference is commonly referred to as 'the performance gap.' The Zero Carbon Hub concluded in their 2014 Evidence Review Report that a compliance process focused on design, rather than as built performance is a key contributor to the 'performance gap'. Excellent design and detailing need to be matched by high quality construction and commissioning for the 'performance gap' between the design and actual in-use energy to be reduced.

3.263 This policy therefore proposes use of an energy performance construction quality assurance scheme to demonstrate compliance with the CE2 policies, as well as driving down this 'performance gap'. The policy does not prescribe use of a particular scheme, noting that there are several well regarded and accredited schemes (such as Passivhaus or Association for Environment Conscious Building (AECB)) currently being used in the UK. Buildings assured with these schemes are superior in build quality, have improved occupant comfort and wellbeing, reduced energy bills, lower carbon emissions and reduced maintenance costs.

3.264 The requirements to monitor and report operational energy in use is already incorporated in the London Plan "Be Seen" policy. It requires major development to report on energy performance for at least five years following completion, with online guidance and a data reporting spreadsheet available.

3.265 Part L energy assessment methodologies (e.g. Standard Assessment Procedure (SAP) for domestic buildings and National Calculation Methodology (NCM) for non-domestic buildings) are currently used to evidence the energy and carbon efforts for all planning applications and demonstrate their compliance with current policy requirements. However, it is important to note that these were developed only to check compliance with Building Regulations, not whether buildings comply with net zero carbon buildings policies, and or the prediction of future energy use.

3.266 Use of Passive House Planning Package (PHPP) for new build residential schemes is therefore recommended, as it has been shown to predict energy use much more accurately than SAP.

Comparative SAP/PHPP modelling undertaken on different typologies suggest that SAP underestimates space heating demand by more than 50 per cent.

3.267 For new non-residential schemes, this policy encourages the use of Chartered Institution of Building Services Engineers (CIBSE) Technical Memorandum 54 (TM54) predictive energy modelling. IESVE, TAS and PHPP are three energy modelling packages that can be used to carry out TM54 assessments. Predictive energy modelling using CIBSE Technical Memorandum 54 (TM54) allows to estimate the operational energy for all end uses of a building (regulated and unregulated) much more accurately. With TM54, more realistic operational scenarios such as the length of hours the building is used can be taken into account.

3.268 Given our climate emergency commitments, the Council wishes to incentivise industries to use less fossil fuels, improve local air quality and reduce greenhouse gas emissions, as part of meeting the targets set. However, it is recognised that existing energy intensive industries subject to the UK Emissions Trading scheme will take time to decarbonise. In the interim, the Council does not wish to prevent development that will substantially reduce carbon emissions and improve air quality. This policy therefore encourages steps to substantially reduce the carbon intensity of energy intensive industries, while also ensuring that a decarbonisation strategy will be delivered over the long term.

Implementation

CE2.ALL	All new buildings should be designed and constructed to be net zero carbon in operation. These net zero buildings should use ultra-low amounts of energy, use low carbon heat (systems that release little or no carbon into the atmosphere), and contribute to the generation of renewable energy on-site. They should also have been constructed with low levels of embodied carbon.
CE2.1	The space heating demand is the amount of heat energy needed to heat a home over a year and is expressed in kWh/m^2/yr. It is a measure of the thermal efficiency of the building elements. Various design and specification decisions affect space heating demand including building form and orientation, insulation, air-tightness, windows and doors and the type of ventilation system. For new build residential schemes (CE2.1.a), this policy recommends use of Passive House Planning Package (PHPP) to demonstrate compliance with policy requirements. For new non-residential schemes (CE2.1.b and CE2.1.c), this policy encourages the use of CIBSE Technical Memorandum 54 (TM54) predictive energy modelling. IESVE, TAS and PHPP are three energy modelling packages that can be used to carry out TM54 assessments. For all other development (CE2.1.d), space heating demand should be considered in the design of the building, so that as little as energy as possible is used to heat the building.

CE2.2	Development should demonstrate they will not use fossil fuels in operation – whether for heat or energy. Development should use low carbon heat sources for heating. This should be demonstrated through the submission of an energy statement and in the design of a scheme. Heat pumps (including air, ground and water source) are currently the most viable technology to achieve widespread electrification of heat at scale while limiting overall demand on the electricity network. The Climate Change Evidence Base also considered 'direct electric' heating, however these have high operating costs for occupants. Other options, such as a heat network using nearby waste heat sources, or a hybrid approach of using direct electric radiators with domestic hot water from a heat pump system is also possible. 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. 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. At the present time, technology such as green hydrogen (i.e. hydrogen produced without using fossil fuels) is unavailable or not commercially viable. We also cannot foresee what technology will emerge as we move away from gas and other fossil fuels. Given this context, future heating technologies will be supported if demonstrated that they are low carbon and sustainable – e.g. 'brown' or 'grey' hydrogen made from fossil fuels would not be supported.

CE2.2	Waste heat can be a potential source of low carbon heat, however any facility producing waste heat must: • follow the waste hierarchy by reducing the amount of waste produced to the greatest extent possible • ensure that energy efficiency is maximised, using as little as energy as possible before producing waste heat, as set out in Policy CE2.1 • Consider air quality impacts, as set out in Policy CE6 Waste heat would not considered a benefit of a scheme, unless a development pays for the heat network infrastructure that would allow the waste heat to be delivered – i.e. passive provision is not considered a public benefit.
CE2.3	Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a building over a year (per square metre). It is a measure of the total energy consumption of the building (kWh/m^2/yr). The EUI of a building covers all energy uses: space heating, domestic hot water, ventilation, lighting, cooking, and appliances. For new residential units (CE2.3.a), this policy recommends use of Passive House Planning Package (PHPP) to demonstrate compliance with policy requirements. For new non-domestic buildings (CE2.3.b), this policy encourages the use of CIBSE Technical Memorandum 54 (TM54) predictive energy modelling. IESVE, TAS and PHPP are three energy modelling packages that can be used to carry out TM54 assessments. Where a non-domestic development does not have an applicable category of use outlined in the policy (e.g. data centres), the development should discuss with the Council what the EUI target should be as early as possible.

CE2.3	For all other development (CE2.2.c), the development should demonstrate efficiency, with a building that uses as little energy as possible – in both regulated and unregulated energy.
CE2.4	The amount of energy generated per year should be measured in kWh per square metre of building footprint. Solar PV panels should be high quality, monocrystalline panels, with efficiency of at least 380 Watt Peak. For developments that are unable to achieve the quantity of renewable energy generation on site as outlined in CE2.4, an offset payment to fund renewable energy generation in the borough is to be sought. This offset payment would cover the purchasing and installation of a PV renewable energy system elsewhere in the borough, which is able to generate the amount of energy equivalent to the gap in onsite provision. Offsetting will only be accepted as a means to achieving planning policy compliance if the building is compliant with all other Net Zero Carbon buildings policies, namely: • The proposed building must not use fossil fuels on-site, as set out in Policy CE2.2 • It must have a level of space heating demand and energy use intensity (EUI) compliant with levels set in the Local Plan in CE2.1 and CE2.3. • On-site renewable energy generation (e.g. through PVs) has been maximised and achieves at least levels set in the Local Plan in CE2.4. • Detailed energy assessment provided as part of an energy statement demonstrating compliance with Policy CE2. The applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh.

CE2.4	As set out in the Climate Change Evidence Base, a floor price of £1.25/kWh has been set, with a 20 per cent project management fee added. This leads to an offset price of £1.5/kWh. These figures are based on the current average price and performance of a PV system, and the cost may vary over time reflecting the costs of delivering the required offset projects. Proposals that include battery energy storage systems in conjunction with on-site renewable energy generation are encouraged to discuss proposals with London Fire Brigade.
CE2.5	Developments should demonstrate that the 'performance gap' has been minimised in an energy statement, and through the use of an energy performance construction and quality assurance scheme. An energy performance and construction quality assurance scheme should demonstrate compliance with the targets in CE2 as well as other design and technical criteria in the individual quality assurance scheme. The energy performance and construction quality assurance scheme used must be recognised by an accredited industry body. Examples of schemes include the Passivhaus standard, and the Association for Environment Conscious Building (AECB) standard. Major development should report on energy performance for at least five years following completion, with online guidance and a data reporting spreadsheet available – as per the London Plan "Be Seen" guidance.

CE2.6

This policy considers existing energy intensive industries to be those that are subject to the UK Emissions Trading scheme. Evidence of this should be submitted as part of any planning application.

It should be demonstrated that the carbon intensity of the industrial site overall will drop substantially, and as low as possible, as a result of the new development. The Council will not support development that results in a greater use of fossil fuels overall by the industrial site. The carbon intensity of the development should be reduced in line with the latest technological ability.

Where the carbon intensity of the development does not meet the levels possible by the latest technological ability, the Council will seek a one-off carbon offset payment for the difference in carbon emissions. In order for the Council to assess a development proposal, funds will be sought from the applicant for an independent energy assessor.

The decarbonisation strategy should be suitably ambitious, considering modern and up-to-date technology, and reflect national, regional and local policies regarding decarbonisation. The plan should also demonstrate the timescales within which decarbonisation will be delivered.

The decarbonisation strategy should be published and formally endorsed by the company's governance structure, prior to submission of the planning application. Development proposals should demonstrate consistency with the decarbonisation strategy. The Council will not support development if the decarbonisation strategy is not considered to be suitably ambitious, does not reflect policies regarding decarbonisation or omits timescales within which decarbonisation will be delivered.

Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- Hydrogen: A decarbonisation route for heat in buildings?, LETI (2021)
- Delivering Net Zero – An evidence study to support planning policies which deliver Net Zero developments, Etude (2023)
- GLA Roofs Designed to Cool, A Review of Reflective and Solar PV Roofs for London, Greater London Authority (2023)

Policy Links

Local Plan:

- CE1: Environmental design and delivery
- CE6: Air quality
- W3: Utilities and Digital Connectivity Infrastructure
- D1: Design standards
- J4: Delivering Community Wealth Building and Inclusive Growth

London Plan 2021:

- GG6: Increasing efficiency and resilience
- SI 2: Minimising greenhouse gas emissions
- SI 3 Energy infrastructure

Policy CE3: Embodied Carbon and the circular economy

1. Embodied Carbon should be considered as early as possible in the planning process, as upfront embodied carbon contributes the largest proportion of embodied carbon across a building's life cycle.

2. The planning of a building should apply circular economy principles and reduce embodied carbon by considering:
    a. how a building is to be built; and
    b. how energy and waste can be minimised throughout the construction process; and
    c. how a building could be deconstructed in future; and
    d. how a building could facilitate future modification, adaption or retrofitting work.

3. Major developments should submit a Circular Economy Statement in accordance with the requirements outlined in London Plan (2021) Policy SI 7 or any additional requirements in the East London Joint Waste Plan.

4. Modern Methods of Construction (MMC) should be used carefully and, where appropriate, the use of MMC must comply with other energy policies.

5. Major developments should undertake a Whole Life Carbon assessment in accordance with the requirements outlined in London Plan (2021) Policy SI 2.

6. Major developments are expected to meet embodied carbon limits of less than 700kg $CO2/m^2$.



Justification

3.269 Both operational and embodied carbon must be reduced to address the climate crisis. Operational carbon has historically been more closely monitored in current legislation and policy, and Policy CE2 strengthens our policies on operational carbon. To achieve our climate targets, embodied carbon must also be drastically curtailed throughout the building life cycle. Embodied carbon refers to the greenhouse gas emissions associated with the manufacture, transport, construction, repair, maintenance, replacement, and deconstruction of all building elements.

3.270 The concept of whole life carbon brings together embodied carbon, operational carbon, as well as any benefits associated with recovery, reuse, or recycle beyond the system boundary. By considering embodied carbon, operational carbon and other benefits together at the earliest stage, ways to reduce carbon can be comprehensively considered, resulting in larger carbon savings.

3.271 Consideration of whole life carbon reductions at the earliest stages of design can reduce embodied carbon by minimising the quantity used and waste created in both in the construction process and methods. It can also 'future proof' the development, by allowing deconstruction of a building for a new use; or allowing for modification, adaption or retrofitting of a building in future.

3.272 The built environment industry uses a large quantity of materials when buildings are constructed, maintained and retrofitted. Materials are often disposed of when they are no longer required in a particular use or building, leading to resource scarcity and environmental degradation. A circular economy is as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.

3.273 The policy encourages applicants to consider how circular economy principles can be applied to the design, construction, use and deconstruction of new developments – helping the built environment industry to move away from using an unnecessarily large amount of materials, reducing the quantity of material thrown away at their end of use in a building and allowing for future adaption, reuse and retrofit of buildings. The London Plan (2021) Policy SI 7 sets out a requirement for developments to promote circular economy outcomes and aim to be net zero-waste, currently this is only for projects referred to the Mayor of London. This policy expands that requirement to all major developments.

3.274 Modern Methods of Construction (MMC) are increasingly being used in the construction industry, with parts or components of a building manufactured offsite. MMC does not directly reduce embodied carbon, as it is the materials of components that attribute the most to the Whole Life Carbon calculations. There are some benefits to MMC that can be used to address embodied carbon in a building's concept design, procurement and end of life considerations – such as efficient control, reuse, recycling and proper disposal of waste. However, MMC can also result in higher levels of embodied carbon – due to over engineering of components and transport of components over a large distance (i.e. avoid overseas manufacture).

3.275 A life cycle assessment (LCA) is the process by which Whole Life Carbon is calculated. The London Plan (2021) Policy SI 2 sets out a requirement for developments to calculate and reduce Whole Life Carbon Emissions, currently this is only for projects referred to the Mayor of London. This policy expands that requirement to all major developments. By requiring design teams to calculate embodied carbon, this policy helps developers and Newham Council start to quantify and then reduce embodied carbon. It is important that buildings meet both the upfront embodied carbon and the life cycle embodied carbon targets. An upfront embodied carbon target is important, as it is in the direct control of the developer and contractor. The calculations should be confirmed post completion, to ensure compliance with the policy.

3.276 At present, there are no universal standard targets for embodied carbon due to a limited evidence base across multiple typologies; however the Low Energy Transformation Initiative (LETI) and Royal Institution of British Architects (RIBA) have set baseline targets for embodied carbon. LETI research indicates that current "average design" achieves an E (around 800kg CO_2/m^2), with 'good designs' achieving a C score (around 500kg CO_2/m^2). Evidence base from other authorities indicates that embodied carbon targets of C can be achieved with a "zero cost uplift" (West of England Combined Authority) and "on cost parity with current building practices" (City of Westminster).

3.277 This policy therefore has embodied carbon limits of less than 700kg CO_2/m^2, as research indicates this is currently deliverable using industry best practice.



Implementation

CE3.1	Major development proposals should show how they have considered embodied carbon as early as possible, including, where applicable, in the pre application process. All development is encouraged to consider embodied carbon. Major development should reference the "Whole Life Carbon" principles in the Whole Life-Cycle Carbon Assessments London Plan Guidance, noting the interventions and measures proposed as a consequence of these principles. This could be demonstrated in a Design and Access Statement, as well as in an embodied carbon report at the time of submission. The embodied carbon report should be aligned with the energy strategy of the site.
CE3.2	Compliance with these requirements should be demonstrated in an embodied carbon report at the time of application submission. Examples of ways this could be demonstrated include: • Demonstration that options for retaining and reusing existing buildings and structures have been fully explored before considering substantial demolition (including incorporating the fabric of existing buildings into the new development); • designing the building for a long life, or allowing for future deconstruction/reuse; • assessment of the carbon emissions associated with pre-construction demolition; • an estimate of the percentage of the new build development which will be made up of existing façades, structures, buildings; • demonstration that the potential for future deconstruction, modification, adaption, renovation and retrofitting has been considered in the design of the scheme; • details of how the Whole Life Carbon principles have informed the development of the site; and
CE3.2	• use of high quality, durable and long life materials that allow for easy maintenance and renovation in the future. More information regarding the circular economy can be found in the LETI Circular Economy 1-pager. The emerging East London Joint Waste Plan should also be considered.
CE3.3	Major developments should submit a Circular Economy Statement in line with the Circular Economy Statement London Plan Guidance that was published by the Greater London Authority in March 2022 (or subsequent updates), and any additional emerging requirements set out in the emerging East London Joint Waste Plan. This should be submitted to the Council for assessment.
CE3.4	A development proposing Modern Methods of Construction (MMC) should demonstrate: • That an MMC design will meet space heating target and airtightness requirements, as per Policy CE2. • That an MMC design will meet net zero targets (i.e. space heating target), and that thermal bridging and connection have been considered. • That overseas manufacture of MMC elements has been avoided. • A quantification of amount of wastage – a typical figure is five per cent. • That an MMC design will meet embodied carbon net zero targets through an embodied carbon assessment, and target figures in line with LETI guidance.

CE3.5	Major developments should undertake a Whole Life Carbon assessment in line with the Whole Life-Cycle Carbon Assessments London Plan Guidance that was published by the Greater London Authority in March 2022, or subsequent updates. This should be submitted to the Council for assessment.
CE3.6	Major developments should demonstrate as part of the Whole Life Carbon assessment that the embodied carbon limits of less than 700kg CO_2/m^2 can be met. This should also demonstrate options assessed in order to optimise reduction of embodied carbon, as well providing details of the calculation of the expected upfront embodied carbon of buildings. At the outline planning stage this can be based on default figures from the RICS professional statement. At the detailed planning stage this should be based on bespoke building assumptions. These embodied carbon calculations should be reconfirmed post completion. More information regarding embodied carbon is available from LETI ("Embodied Carbon target alignment" paper) and the GLA (London Plan Guidance – Circular Economy Statements). Developers are also encouraged to offset the remaining embodied carbon of new buildings, delivering developments that are zero carbon in both construction and operation. As part of the London Borough of Newham Just Transition Plan, the Council is setting up a Just Transition Fund, which will fund and administer projects that help the borough to achieve a just transition to net zero by 2045. Developers are encouraged to use this fund to offset their remaining embodied carbon, rather than offsetting this embodied carbon elsewhere in the UK or the world.

Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- Climate Change Evidence Base – Embodied carbon topic paper, Etude (2022)
- LETI Circular Economy 1-Pager, LETI (2022)
- LETI Embodied Carbon target alignment, LETI (2021)
- Circular Economy Statement London Plan Guidance, Greater London Authority (2022)
- Whole Life-Cycle Carbon Assessments London Plan Guidance, Greater London Authority (2022)
- Housing Design Standards London Plan Guidance, Greater London Authority (2023)
- Evidence Base for West of England Net Zero Building Policy: Embodied Carbon, West of England Combined Authority (2021)
- Embodied Carbon Evidence Base, Westminster City Council (2024)

Policy Links

Local Plan:

- CE1: Environmental design and delivery
- CE5: Retrofit and circular economy
- D1: Design standards

London Plan 2021:

- SI 2: Minimising greenhouse gas emissions
- SI 7: Reducing waste and supporting the circular economy

Policy CE4: Overheating

1. All new development must consider the potential of overheating, in the light of the changing climate and increased likelihood of heatwaves, and seek to reduce overheating risk. This must be demonstrated through:
    a. All proposals for new residential units must submit the Good Homes Alliance 'Early Stage Overheating Risk Tool'. If a medium or high risk score (>8) is indicated, applicants should undertake overheating modelling; and
    b. For major residential applications, a Dynamic Thermal modelling overheating risk assessment should be undertaken.
    c. All major non-residential development is expected to demonstrate how overheating potential has been minimised, reflecting the end use of the building.
    d. All development should consider the potential of overheating, and how overheating potential can be minimised.

2. Developments should mitigate overheating by using 'passive design' principles, rather than relying on 'active cooling' such as air conditioning.

3. All development where Building Regulations Part O applies should submit proof of ability to meet Part O provided as part of the planning application.

Justification

3.278 In an increasingly warming climate, overheating is becoming extremely critical. High temperatures can lead to premature deaths, especially older people or those with underlying health conditions such as respiratory illness. The Greater London Authority's Climate Risk map shows that the majority of the borough has a high level of heat risk, with homes in London particularly at risk to overheating due to the urban heat island effect and the dense population. The Climate Resilience Report for London states that London could experience multiple 45°C days in the foreseeable future. The Climate Change Committee reported that – if not addressed – overheating in buildings is expected to cause some 4,500 premature deaths per year by 2050 in the UK.

3.279 In light of the above, all development should consider overheating, within new homes and their wider environment, being designed to mitigate overheating effectively.

3.280 The Climate Change Evidence Base that supports Policy CE2 sets out how heat gain can be beneficial for buildings, as less heating is required. However, the design of new development should strike the right balance between helpful heat gain in winter and unhelpful heat gain in summer. All development can suffer from overheating, such as new homes, commercial development and industrial warehouses. Some buildings – such as health or educational facilities – may also have vulnerable users at risk from overheating.

3.281 This policy promotes clear and simple, design based solutions to mitigate overheating potential at the very earliest stage of design, while acknowledging that Building Regulations and detailed overheating modelling can also play an important role in reducing overheating in new homes. The Building Regulations Part Document O released in December 2021 requires a relevant project to demonstrate that unwanted solar gains are limited, and that heat can be adequately removed from the indoor environment.

3.282 However, overheating needs to be considered at the earliest possible stages of design, so that 'passive design' principles can be incorporated. Design elements that can mitigate overheating risk include the orientation of buildings, reducing glazing, increasing the openable area of windows, ensuring dual aspect and cross ventilation and external shading. A poor quality design may require 'active cooling' such as air conditioning to meet building regulations – which would also hamper a development's ability to meet Policy CE2 given the substantial amount of energy required to run a system.

Implementation

CE4.1	For new residential units, applicants are recommended to submit the 'Early Stage Overheating Risk tool' as early as possible – such as at the pre application stage. This allows for overheating to be comprehensively considered during the early stages of design. Guidance on the tool is available on the Good Homes Alliance website. Good Homes Alliance website. If a medium or high risk score (>8) on the tool is indicated, an Overheating Report should be submitted – including overheating modelling using the Dynamic Thermal Modelling method in accordance with CIBSE TM59 but with the additional limitations stipulated in Approved Document O. Major residential schemes should provide initial results of the Dynamic Thermal Modelling overheating risk assessment during the pre-application process and a further iteration of the assessment should be provided at the time of the planning application. All development should consider overheating, with non-residential development demonstrating this in a Design and Access Statement, noting the available guidance and design considerations to mitigate overheating. Overheating modelling should take into account the effects of climate change, consider the outputs of the 'Early State Overheating Risk tool' and align with relevant Greater London Authority and Chartered Institution of Building Services Engineers guidance. Consideration should be given to the future use of the building and the people who will use it (such as identified vulnerable users), noting health and equity considerations.
CE4.2	All new development should demonstrate use of 'passive design' principles to mitigate overheating in the Design and Access Statement. Where overheating potential is identified by the Early Stage Overheating Risk Tool as outlined in Policy CE4.1, consideration of 'passive design' principles to mitigate overheating should be shown. Examples of 'passive design' principles include: 1. optimising solar gains (such as building orientation, overshadowing from buildings, external/internal glazing, the g-value of glazing, shutters and external shading); 2. reducing or minimising internal heat gains (using ultra-low energy appliances as per Policy CE2); 3. maximising passive cooling potential (such as window size and location, window openable areas, mechanical ventilation, cross ventilation and dual aspect); 4. consideration of materials; 5. local microclimate (such as avoiding large areas of unshaded concrete/tarmac, using watercourses for urban cooling). Consideration should also be given to reducing the urban heat island effect, installing cool roofs (reflective and solar PV), minimising areas of unshaded concrete/tarmac, using watercourses for urban cooling and urban greening – in line with Policy D2 and Policy GWS1. This policy does not support the use of 'active cooling' such as air conditioning to mitigate overheating risk, unless a high levels of external noise, significant local pollution, or 'agent of change' issues must be mitigated against. Specialist older persons housing can have 'active cooling' in communal areas, to safeguard vulnerable residents during extreme hot weather events.

CE4.3	Developments should provide proof of ability to meet Building Regulations Part O in an overheating statement at the time of the planning application. Meeting Building Regulations Part O should also be considered alongside other standards in the Local Plan including noise standards. Applicants in noisier areas must consider ways to reduce overheating which do not rely on opening windows, where this would expose occupants to uncomfortable or unacceptable noise levels. As noted in CE4.2, there may be circumstances where 'active cooling' is required to mitigate a significant noise, pollution or 'agent of change' issue, or for specialist older persons housing. Policy H11 should also be considered, which requires the provision of alternative building aspects where poor external conditions including noise and visual amenity exist.

Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- Climate Change Evidence Base – Overheating guidance and topic paper, Etude (2022)
- Research into overheating in new homes, MHCLG (2019)
- Overheating in New Homes – Tool and guidance for identifying and mitigating early stage overheating risks in new homes, Good Homes Alliance (2019)
- Housing Design Standards London Plan Guidance, Greater London Authority (2023)
- Climate Resilience Report for London, Greater London Authority (2023)
- GLA Roofs Designed to Cool, A Review of Reflective and Solar PV Roofs for London, Greater London Authority (2023)

Policy Links

Local Plan:

- CE1: Environmental Design and delivery
- CE2: Zero Carbon development
- D1: Design Standards
- D2: Public realm net gain
- D7: Neighbourliness
- GWS1: Green spaces
- H11: Housing design quality

London Plan 2021:

- D6: Housing quality and standards
- SI 4: Managing heat risk



Policy CE5: Retrofit and the circular economy

1. Retrofit measures that improve energy efficiency, reduce carbon emissions and extend the lifespan of a building are strongly encouraged. Any retrofit measures should use best practice improvements to the building fabric.

2. Applicants are strongly encouraged to undertake positive retrofit action when other development is occurring, even when the retrofitting would not require planning permission. The submission of a comprehensive energy improvement strategy is also encouraged.

3. Where planning permission is required for retrofit work:
    a. a retrofit plan should be submitted.
    b. use of quality assurance processes such as EnerPHit or Energiesprong is recommended.

4. Applicants should consider the circular economy when undertaking retrofit measures, using high quality materials and considering the future flexibility and adaptability of a building.

Justification

3.283 New buildings will only make-up a small percentage of Newham's buildings. While the energy performance of existing buildings in Newham is improving, it remains poor. It is estimated that 80 per cent of the buildings in the UK will still be present in 2050, and energy consumption of existing buildings is around 34 per cent of the UK's annual carbon emissions. Therefore, existing buildings will have to be retrofitted if Newham is to achieve its climate objectives and achieve a Just Transition.

3.284 Retrofitting involves upgrading or replacing parts of a building to improve energy efficiency, reduce carbon emissions and extend the lifespan of an existing building. High quality retrofit measures can deliver reduced fuel bills and reduced fuel poverty, reduce carbon emissions, improve air quality, reduce demand for renewable energy, improve health outcomes and increase the value and functionality of a building.

3.285 Retrofitting, rather than demolition and rebuild, is generally a lower embodied carbon strategy – if the retrofit measures are high quality and comprehensive.

3.286 For many residential buildings, most common retrofit measures do not require planning permission. Therefore, this policy seeks to enable suitable retrofit schemes which do require planning permission and encourage the inclusion of further retrofit measures which reduce the carbon associated with a building and the submission of a comprehensive energy improvement strategy, alongside any works requiring permission. The costs of undertaking retrofit measures are significantly reduced when undertaken alongside other works to a building.

3.287 'Best practice' fabric improvements – i.e. high quality, comprehensive retrofit measures – are encouraged to ensure that a building does not need to be retrofitted twice. The Climate Change Evidence Base explains that 'shallow' retrofits of a building will only lead to a limited reduction in energy use, leading to neutral or even adverse effects. For example, replacing a gas boiler with a heat pump may result in higher costs if the building has very high levels of space heating demand – the fabric of the building must be retrofitted at the same time. Another example – building a well insulated roof extension without insulating the rest of the house can lead to overheating in the new room(s) as heat is trapped.

3.288 This policy also supports the installation of solar PVs on existing buildings, noting heritage and design considerations.

3.289 A retrofit plan demonstrates how retrofitting has been considered comprehensively across the building, including various retrofit measures that could be undertaken and specific technologies that could be used. The retrofit plan therefore allows an understanding of the best retrofit works for a building, as well as the cost, impact and disruption of various options.

3.290 Quality assurances processes such as EnerPHit or Energiesprong include targets for heating demand, energy consumption and renewable energy generation. Taken together, these allow for an understanding of the quality of a proposed retrofit project, and the improvements that will be made to the building.

3.291 A circular economy is as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. This policy encourages applicants to consider the circular economy principles while undergoing retrofit – helping the built environment industry to move away from using an unnecessarily large amount of materials, reducing the quantity of material thrown away at their end of use in a building and allowing for future adaption, reuse and retrofit of buildings.

Implementation

CE5.1	Best practice fabric improvements to the building could include improvements to building insulation (wall, roof, floor), new windows, new external doors, heat pumps, PV solar panels and mechanical ventilation with heat recovery (MVHR). Overarching principles of retrofitting include: • Reducing energy consumption • Prioritising the health of occupants • Considering the integrity and functionality of the building • Considering retrofitting of the whole building • Measuring performance of retrofit interventions • Considering impact on embodied carbon Proposed retrofit works for listed buildings or non-designated heritage assets should have regard to relevant guidance from Historic England, and are recommended to engage with the Council's pre application advice service at the earliest opportunity. Substantial guidance on retrofit is available from bodies such as LETI (Climate Emergency Retrofit Guide) and the UK Green Building Council (Key Considerations for Commercial Retrofit).
CE5.2	Applicants are encouraged to submit a retrofit plan, including an energy improvement strategy – to ensure that the retrofit actions they are undertaking will deliver substantial benefits to the building. Examples of positive retrofit actions that may not require planning permission include replacing windows (double or triple glazing), replacement of insulation, replacing heating systems (with low carbon heat such as heat pumps or direct electric), installing a battery energy storage system, installing wastewater heat recovery, installing PV solar panels and replacing older appliances with ultra-low energy ones. Applicants are encouraged to discuss retrofit measures going beyond those that do require planning permission with the Council through the pre-application process.

CE5.2 Substantial guidance on retrofit is available from bodies such as LETI (Climate Emergency Retrofit Guide) and the UK Green Building Council (Key Considerations for Commercial Retrofit).

CE5.3 Where planning permission is required for retrofit work, development should submit a retrofit plan, including an energy improvement strategy. Development is encouraged to use quality assurance processes such as EnerPHit or Energiesprong.

A retrofit plan should:

- Consider all aspects of Policy CE2, including energy targets. For example, a heating energy demand target (which is an indicator for comfort and health and enables a larger range of heating technologies to be used), a total energy consumption target, and a total renewable energy generation target. Some example targets are given by initiatives such as the LETI Climate Emergency Retrofit Guide, the Passivhaus EnerPHit standard or Energiesprong.
- Set out key building information, constraints, risks, and opportunities.
- Ensure that the most appropriate combination of technologies and measures are used for the building.
- Use the whole house approach, maximising energy savings while minimising unintended consequences to health and the building structure.
- Be appropriate in the level of detail and intervention for the project
- Include a plan for monitoring and reporting energy consumption following retrofit works.

For large scale developments, a retrofit plan should be developed with the support of a Retrofit Co-Ordinator, an individual who project manages a retrofit project. They oversee identification, specification and evaluation of retrofit measures for installation and their subsequent monitoring and evaluation.

CE5.4 Where planning permission is required for retrofit works, applicants should demonstrate consideration of the circular economy in a retrofit plan.

Existing buildings undergoing retrofit measures should aim (where possible) to:

- Restore or refinish existing parts of a building
- Repurpose or reuse structures, systems, components and materials
- Make use of recycled or repurposed materials
- Remanufacture, reprocess or recycle materials at the end of their use in the building

In all instances, high quality, long life materials should be used that allow for easy maintenance and renovation of the building in the future.

More information regarding the circular economy can be found in the LETI Circular Economy 1-pager. The emerging East London Joint Waste Plan should also be considered.

Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- Climate Change Evidence Base – Retrofit topic paper, Etude (2022)
- Delivering Net Zero: Key Considerations for Commercial Retrofit, UKGBC (2022)
- LETI Climate Emergency Retrofit Guide, LETI (2021)
- LETI Circular Economy 1-Pager, LETI (2022)
- Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency, Historic England (2018)

Policy Links

Local Plan:

- CE1: Environmental design and delivery
- CE2: Zero Carbon development
- CE3: Embodied carbon and circular economy
- D1: Design standards
- H11: Housing design quality
- D8: Conservation Areas and Areas of Townscape Value
- D10: Designated and non-designated buildings, ancient monuments and historic parks and gardens

London Plan 2021:

- GG6: Increasing efficiency and resilience
- SI 2: Minimising greenhouse gas emissions
- SI 7: Reducing waste and supporting the circular economy



Policy CE6: Air quality

1. All development should mitigate and improve Newham's poor air quality. Development will not be supported where it will create an increase in local pollutant emissions, and/or residents will be negatively impacted.

2. Development along major roads or in other locations that experience poor air quality that cannot be mitigated through local measures should improve the dispersal of identified pollutants and reduce exposure to poor air quality.

3. Measures to improve local air quality should be delivered on site, especially in cases where emissions need to be reduced to meet Air Quality Neutral requirements – or to reduce the impact of the development on local air quality. Where it is not possible to fully mitigate the air quality impacts of a new development on site, contributions will be sought to contribute to off-site measures.

4. Development should show regard to the Non-Road Mobile Machinery (NRMM) requirements and other elements of The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, Mayor of London, 2014.

5. New moorings on waterways must include an electrical hook-up at each mooring point.

6. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment must consider how local air quality can be improved across the area of the proposal as part of an Air Quality Positive approach.



Planning obligation

- Development may be required to make a financial contribution to pay for off-site measures to improve air quality elsewhere in the borough, when a development is unable to mitigate levels of poor air quality on site, or where a large scale development causes a large number of vehicle trips.

Justification

3.292 Newham has very poor air quality, with one in seven of Newham's population exposed to levels of Nitrogen dioxide (NO2) that is above the UK limit value for human health. Newham residents are also exposed to an average level of airborne particulate matter (PM2.5) that is greater than the World Health Organisation guideline value of 5µg/m3. Poor air quality increases the risk of life-changing illnesses such as cancer, asthma, lung disease and dementia in older people. The poor quality of air has resulted in Newham having the highest rate of deaths from pollution in England – amounting to an estimated 96 people dying prematurely each year.

3.293 Newham has several major roads that run through the borough (A13, Barking Road and Romford Road) and major roads that run adjacent to the borough boundary (A406 (North Circular) and A12). This leads to poor levels of air quality adjacent to these routes.

3.294 Transport for London have implemented the Ultra Low Emission Zone (ULEZ) across Greater London, with 97 per cent of vehicles in inner London compliant to the emission standards as of October 2023. However, ULEZ limits NO2 emissions but does not directly seek to reduce CO2 emissions or particulate matter, and further efforts to improve air quality are required.

3.295 Newham's industrial past means there are substantial polluting uses located across the borough, especially in the Royal Docks. Industry that supports construction is also a major contributing factor to poor air quality.

3.296 Given the above, the whole borough was designated an Air Quality Management Area in 2018, and the Newham Air Quality Action Plan (AQAP) sets out measures to reduce emissions from key sources of air pollution in the borough. As with most areas in London, Newham is also a Smoke Control Area, which allows the borough to enforce the use of smokeless fuels in chimneys or fireplaces. It is noted that smokeless fuels still produce PM2.5.

3.297 This policy is therefore crucial in ensuring that development does not worsen levels of poor air quality, and improves air quality for residents in the borough. Other Local Plan policies such as the transport, neighbourliness and economy policies will also help to deliver better levels of air quality in the borough.

3.298 This policy sets out specific design interventions and considerations for development, ensuring that air quality levels in the borough are improved, and that health of residents is prioritised in the design of new residential developments.

3.299 Since 2010, the number of houseboats in London has doubled. Over 50 per cent of boats do not have a permanent mooring. Heating systems on houseboats are typically fuelled by oil, natural gas or solid fuel such as wood and coal. All these heating sources contribute to poor air quality, however solid fuel sources are particularly inefficient – leading to high levels of nitrogen dioxide and airborne particulate matter. This policy therefore sets out to encourage a move towards greener and less polluting houseboats, by ensuring that new moorings on waterways have electrical hook-ups, and encouraging the installation of electrical hook-ups at existing moorings.

3.300 The Greater London Authority's Air Quality Positive approach aims to maximise benefits to local air quality in and around a large-scale development sites and masterplan area while also minimising exposure to existing sources of poor air quality.

3.301 Physical and green buffers can improve local air quality locally. This is especially important along major routes and sensitive uses, where a physical buffer can reduce air pollution and improves views and aspects.

3.302 Extending the distance between pollution sources and a facility allows for air pollution to disperse (mix into clean air), and can reduce exposure. Nature based solutions can also be introduced to act as a green screen buffer around play and informal recreation facilities policies GWS1 and GWS3. The use of nature based solutions can also help with other of climate impacts, such as flooding, drought and overheating.

3.303 However, it should be noted that green infrastructure in itself is not the solution to air pollution. The amount of pollution removed or deposited on tree or shrub leaves is very low when compared to urban pollution concentrations. As a component of good urban design, green infrastructure also can help to[46] reduce emissions.[46]



[46] Ferranti, EJS., Acton, WJF., Lindop, A., Wolstencroft, M., Han, U.P., Levine, J.G., MacKenzie, AR., Grayson, N. 2021. Urban Design for Air Quality. A Design Charter produced by the WM-Air Project, University of Birmingham. Funding provided by NERC Innovation grant NE/S003487/1. https://doi.org/10.25500/epapers.bham.00003493

Implementation

CE6.1	Development should demonstrate how Newham's poor air quality will be improved, with development meeting Greater London Authority thresholds submitting an air quality assessment showing regard to GLA guidance. The Council will have regard to the national Air Quality standards and the World Health Organisation Air Quality Guidelines when assessing air quality. Our current guidance on air quality assessments requires all development to be Air Quality Neutral (as does the London Plan (2021)). Where the development involves a significant increase in deliveries to or from the development, the air quality assessment should also consider the impact of vehicle trips. Air quality assessments should show how the development will not create unacceptable risk of high levels of exposure to poor air quality. In mixed-use developments, less sensitive uses should be used as a buffer to residential uses and outdoor amenity spaces. Considered placement of uses should respond to the existing environmental quality of sites. Masterplans and larger developments have the opportunity to locate more sensitive uses strategically away from sources of noise and air pollution. This is expanded on further in Policy D7. Where back up generators are required as part of a development (such as at a hospital or data centre), these should be high quality, of the highest environmental standards. Battery energy and zero carbon alternatives to fossil fuel powered generators are strongly encouraged, in light of the Council's Climate Emergency commitments.
CE6.2	Development should demonstrate how poor air quality from major roads (or other polluting uses) will be mitigated, as part of an air quality assessment having regard to Greater London Authority guidance, as well as in the design of the scheme (such as in a Design and Access Statement). The Newham Characterisation Study provides specific guidance and recommendations on how local measures can improve the dispersal of identified pollutants and reduce exposure to poor air quality. Along highly trafficked vehicular routes, building orientation and massing should maximise the environmental quality of external private amenity spaces, play space and internal spaces within apartments. In locations where residential uses are directly facing onto busy roads, internal layouts should be carefully considered to maximise the environmental quality in all habitable rooms and outdoor amenity spaces. This is expanded on further in Policy H11. Extending the distance between pollution sources and a facility allows for air pollution to disperse (mix into clean air), and can reduce exposure. Nature based solutions can also be introduced to act as a green screen buffer around play and informal recreation facilities (see policies GWS1 and GWS3). Species mix, density height and leaf shape should be selected to reduce the most harmful airborne pollutants. Ways that green infrastructure can help to reduce emissions includes encouraging usage of cycleway and footpaths; extend the distance between pollution sources and individuals via mixed planting to create heterogeneous surfaces, or grass verges between roads and footpaths and; protect vulnerable people (e.g. green barriers).

CE6.3	As part of an air quality assessment having regard to Greater London Authority guidance, development should demonstrate how measures to improve air quality will be delivered on site, and how emissions will be reduced to meet Air Quality Neutral requirements. Measures to improve air quality should take place on site, by minimising combustion and reducing the quantity of fossil fuels used. In situations where it is not possible to fully mitigate levels of poor air quality from new development, developers will contribute to off-site measures to improve air quality elsewhere in the borough. Major developments that cause a large increase in vehicles trips will also have to contribute to mitigating levels of air quality in the borough, linking to the objectives of the Transport policies to reduce vehicles trips and improve air quality.
CE6.4	Development should show regard to the Non-Road Mobile Machinery (NRMM) requirements set out in Greater London Authority Control of Dust and Emissions During Construction and Demolition SPG. The use of battery energy and zero carbon alternatives to power NRMM and other construction equipment on site is strongly encouraged, in light of the Council's Climate Emergency commitments. Major development should also demonstrate compliance with the Code of Construction Practice endorsed by the Mayor of London, with all development having regard to it when undertaking construction or demolition work. Development should also register Non-Road Mobile Machinery on the Greater London Authority website.
CE6.5	Development should demonstrate that all new houseboat moorings will provide suitable infrastructure to enable houseboats that use the new moorings to use electricity for heating when moored, rather than using fossil fuels. Existing houseboat moorings are also encouraged to install suitable infrastructure to enable houseboats to use electricity for heating when moored, rather than using fossil fuels. Applicants are recommended to discuss their proposal with the Canal and River Trust at the earliest possible opportunity.
CE6.6	Developments required to meet Air Quality Positive standards should demonstrate how they have done so within an Air Quality Assessment containing an Air Quality Positive statement having regard to with Greater London Authority guidance, as well as in the Design and Access Statement. This should demonstrate how proposals have considered ways to maximise improvements to local air quality and what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this. The Greater London Authority's Air Quality Positive approach aims to maximise benefits to local air quality in and around large-scale development sites and masterplan areas while also minimising exposure to existing sources of poor air quality. It requires planners, designers, architects, and air quality experts to demonstrate what measures have been taken during the design stages to achieve the best possible outcomes for air quality.

Evidence base

- Climate Change Evidence Base – Operational energy and carbon, Etude (2022)
- Newham Characterisation Study, Maccreanor Lavington (2024)
- Future of Freight: a long-term plan, Department for Transport (2022)
- Transitioning to zero emission cars and vans: 2035 delivery plan, Department for Transport (2021)
- Air Quality Action Plan 2019 – 2024, London Borough of Newham (2019)
- Air Quality Positive London Plan Guidance, Greater London Authority (2023)
- Air Quality Neutral London Plan Guidance, Greater London Authority (2023)
- Control of Dust and Emissions during Construction and Demolition SPG, Greater London Authority (2014)

Policy Links

Local Plan:

- D4: Tall Buildings
- D7: Neighbourliness
- H11: Housing design quality
- CE1: Environmental design and delivery
- CE2: Zero Carbon development
- T1: Strategic transport
- T2: Local transport
- T3: Transport behaviour change
- T4: Servicing a development
- T5: London City Airport

London Plan 2021:

- GG3: Creating a healthy city
- D3: Optimising site capacity through the design-led approach
- SI 1: Improving air quality
- SI 3: Energy infrastructure



Policy CE7: Managing flood risk

1. All new development must avoid placing people or essential infrastructure at increased risk of flooding for the lifetime of the development through considering flood risk at the earliest design stage and, where required, by liaising with the Environment Agency, infrastructure providers and the Council (including the Lead Local Flood Authority) to deliver climate resilient development. To meet this requirement, all new development must:
    a. assess the risk of flooding from all sources as informed by the Strategic Flood Risk Assessment (SFRA) or subsequent updates of the evidence and best available data; and
    b. be located in areas with the lowest risk of flooding, as informed by passing the sequential test and if necessary the exception test. The sequential approach applies across the borough and within sites, so that areas with the lowest risk are identified and prioritised for development, according to the vulnerability of the proposed use; and
    c. avoid and reduce the risk of flooding from all sources both on site and elsewhere on any location; and
    d. provide a Flood Risk Assessment, when required by, and in in accordance with, national requirements, the SFRA and Environment Agency advice.
2. Developments within Flood Zones 2 (medium probability of flooding) and 3 (high probability), or within the tidal breach flood extent or where detailed more up to date modelling shows it will be at increased risk of flooding due to the impacts of the climate emergency, should:
    a. create space for water; and
    b. be designed and constructed to be flood resistant and resilient; and
    c. locate vulnerable uses above ground floor level, while still delivering active, welcoming and functional street level design; and
    d. ensure all basement locations provide internal access and egress via floors no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency, or above the 2100 tidal breach flood level where the site is within the Thames tidal breach flood extent; and
    e. ensure all 'less vulnerable', 'more vulnerable', 'highly vulnerable' and 'essential infrastructure' uses have finished floor levels no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency; and
    f. provide safe access/egress, such that occupants can reach Flood Zone 1 via public rights of way or, if not possible, safe havens on higher floors.
3. Developments (including redevelopment of existing buildings and sites) must be set back a minimum of 16 metres from the landward side of tidal flood defences and eight metres from the landward side of fluvial river defences to future proof against increased risks of flooding.

    Developers would need to take into account the requirements set out in the Thames Estuary 2100 Plan when proposing development within 16 metres of the landward side of tidal flood defence. Where no formal defences are present, development must be set back eight metres from the top of the river bank.

4. Development adjacent to flood defences must confirm through liaison with the Environment Agency, that defence structures are in good condition and will provide protection for the lifetime of the development including taking into consideration the latest Climate Change Allowance modelling, and, where applicable, meet the provisions set out in the Thames Estuary 2100 Plan.

    If any improvements are required, these should be completed prior to development (factoring in impacts on scheme phasing and the end users of schemes) and should consider the need to design for extreme climate change scenarios.

5. Proposals within N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North N4 Canning Town, N5 Custom House, N6 Manor Road and N17 Gallions Reach neighbourhoods must have regard to the infrastructure requirements and recommendations set out in the Royal Docks and Beckton Local Integrated Water Management Strategy, particularly in relation to alleviating localised surface water drainage problems, ensuring sufficient infrastructure capacity and surface water and fluvial flood risk measures.

Planning obligation

- Contributions towards flood and water management infrastructure upgrades where required.

Justification

3.304 Newham has declared a climate emergency, which requires urgent action to be taken to counter the impacts of climate change. Recent climate change projections suggest that London will experience changing rainfall patterns. This will mean more intense rainfall episodes for longer periods of time and sea level rise with potential for increased storm surges, including within the tidal Thames.

3.305 Newham's watercourses are at the Thames, Roding and Lea Rivers with some major growth areas falling within Zones 2 and 3. Flood risk, both the likelihood and severity of occurrences, is therefore likely to increase from a range of sources: tidal, fluvial (rivers), rain (surface water), groundwater, sewer overflow and reservoir failure. As such, it is vital that development minimises flood risk, and in particular reduces the risk to people and essential infrastructure.

3.306 Tools to reduce this risk include the sequential test and exception test which, as outlined in the NPPF and Planning Policy Guidance (PPG), must be followed; sustainable drainage solutions; and delivery of well-designed and integrated flood defences, which should be designed to be sufficiently resilient as weather patterns change.

3.307 The Greater London Authority has published a Sub-Regional and a Local Integrated Water Management Strategy (to cover the Royal Docks and Beckton Opportunity Area) to identify options for sustainably managing water to meet the needs of growth. These strategies will supplement this policy as guidance to reduce the risks of flooding across the development areas and wider drainage network, whilst minimising the demand on stressed water resources, factoring in climate change.

Implementation

CE7.1	Applicants will be required to demonstrate their proposals have taken account of flood risk from all sources (tidal, fluvial (rivers), rain (surface water), groundwater, sewer overflow and reservoir failure) and in the context of predicted climate change. If a site is not currently shown to be within Flood Zone 2 or 3, but more detailed and up to date modelling shows it is expected to be impacted when climate change is assessed, then the same design considerations should be applied as if it was within a higher risk Flood Zone. The SFRA has identified catchments in the borough which are more sensitive to flood risk from the cumulative impact of development and where more stringent policy regarding flood risk is recommended. Any development in these areas should seek to contribute to work that reduces wider flood risk in those catchments. The locations of these catchments and relevant recommendations can be found in the SFRA.

CE7.1

Major proposals must use the SFRA as the primary document to inform site assessments and provide responses to this, in relation to mapping, flood defences and the use of Sustainable Urban Drainage System. In line with the NPPF this information should be used for Flood Risk Assessments (FRAs) where required. The SFRA also outlines when site-specific Flood Risk Assessments are required. However, this should be supplemented with the latest and most relevant information from the Environment Agency, which may include models more up-to-date than those used in production of the SFRA.

The assessment must set out the known flood risk potential from all sources of flooding to the development site, the potential off-site flood risk issues and set out how this will be managed, with due consideration to the impacts of the climate emergency.

An exceptions test is required for sites not allocated in the Plan and where it includes development which is classed as;

- More vulnerable in Flood Zone 3a.
- Highly vulnerable in Flood Zone 2 (this is not permitted in Flood Zone 3a or 3b).
- Essential infrastructure in Flood Zone 3a or 3b.
- Any development with significant risk in the surface water 1 per cent AEP event plus 40 per cent climate change allowance flood extent.
- Any development with significant risk in the Risk of Flooding from Reservoirs mapping 'Wet Day' flood extent.

Investigation on flood risk issues should be commenced sufficiently early in the design and planning process so that all opportunities to reduce flood risk can be identified and maximised.

CE7.2

Applicants must have regard to areas at risk from all sources of flooding to ensure that vulnerable uses (as defined by the NPPF) are not located in areas at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

Design measures to reduce and mitigate flood risk must be in conformity with the design policies and other relevant policies of the plan, including the spatial strategy for the location of different land uses.

Applications for proposals in areas at risk of flooding must refer to the SFRA and PPG and design in measures from the outset. The design measures must reflect the vulnerability classifications of the proposed land uses. This should be considered at the earliest possible stage.

The full list of vulnerability classifications are set out in the PPG and are categorised as;

- 'Essential Infrastructure' – including transport and utilities infrastructure.
- 'Highly Vulnerable' – including emergency services stations, basement dwellings and emergency dispersal points.
- 'More Vulnerable' – including hospitals, residential institutions, dwelling houses, drinking establishments, non-residential uses for health services, nurseries and education establishments.
- 'Less Vulnerable' – including emergency services stations not required to be operational during flooding, buildings for shops, professional services, waste treatment, sewage treatment works if flood management control is in place, car parks.
- 'Water Compatible' –including flood control infrastructure, docks, marinas and wharves, navigation facilities, ship building, amenity open space, outdoor sports and recreation.

CE7.2	In addition to the above vulnerability considerations, sleeping accommodation will not be permitted below the tidal breach flood level, in line with national planning policy. This is not limited to basements, and can apply to ground and higher floors, where sleeping accommodation is proposed below the breach flood level.
CE7.3	Flood defences covered by this policy can include underground components such as tie rods and ground anchors which may protrude into the site. The Thames Estuary 2100 Plan Flood defence (set-back) buffering line is indicative only and applicants are responsible for investigating the status and nature of flood defences, in consultation with the Environment Agency, at the earliest stage. If any improvements are required, these should be completed prior to development. All changes should result in improved access to existing defences. This process should be undertaken in liaison with the Environment Agency and the Local Authority.
CE7.4	The future raising requirements of the flood defences levels in Newham are as follows: • Raising of all defences along the Thames upstream of the Thames Barrier by up to 0.5m by 2050, and by an additional 0.5m by 2100. • Raising of defences on the River Lea (from Three Mills to the Thames) in 2050 and 2100 by up to 1m in total. • Raising of defences on the River Roding (from Ilford Bridge to Barking Barrier) in 2050 and 2100, by up to 1m in total. • The Thames Estuary 2100 Plan contains a number of high-level options to manage flood risk in London and the Estuary to the end of the century and beyond. This may require modification to the existing Thames Barrier, and so any proposed developments or land uses, within the vicinity of the Thames Barrier site, must ensure it does not prevent this modification from occurring.

CE7.4	• If the decision is made to modify / improve the Thames Barrier rather than build a new barrier further downstream, it will be required to raise all defences downstream of the Thames Barrier by up to 1.1m by 2070, and by an additional 0.5m by 2100. The flood control gate on the King George V Dock would also require replacement, and may do irrespective of a decision regarding the Thames Barrier. Development around the George V Flood Gate must ensure that it will not impact on the ability for this upgrade to take place when required. Further detail is set out in the Thames Estuary 2100 Plan regarding the need for existing flood defences improvements and requirements to be considered in designing proposals adjacent to the river. For the purposes of this policy, the lifetime of a development is considered to be at least 100 years for residential developments and 75 years for commercial developments. The safeguarding, and future proofing, of flood defences is critical to achieving climate resilient development. Proposals are expected to plan for the most extreme weather events with due consideration to the phasing of major development proposals. If any improvements are required, these should be completed prior to development. The Environment Agency and the Local Authority can advise on delivering these requirements.
CE7.5	Developments within the neighbourhoods which form the Royal Docks and Beckton Opportunity Area should deliver the relevant site specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.

Evidence base

- London Borough of Newham Strategic Flood Risk Assessment, Parts 1 and 2, JBA Consulting (2025)
- London Borough of Newham Sequential and Exception Tests (2025)
- Climate Change Risks for London: A review of evidence under 1.5c and different warming scenarios, JCSC (2019)
- Royal Docks and Beckton Integrated Water Management Strategy, Greater London Authority (2023)
- Local Flood Risk Management Strategy, London Borough of Newham (2015) and Draft Local Flood Risk Management Strategy, London Borough of Newham (2022)
- Sub-regional Integrated Water Management Strategies, Greater London Authority (2023)
- Thames Estuary 2100 Plan, Environment Agency

Policy Links

Local Plan:

- BFN2: Co-designed masterplanning
- GWS1: Green spaces
- GWS2: Water spaces
- CE1: Environmental design and delivery
- D2: Public realm net gain
- W3: Utilities and digital connectivity infrastructure
- Section 4: Neighbourhoods

London Plan 2021:

- SI 12: Flood risk management
- SI 14: Waterways – strategic role



Policy CE8: Sustainable drainage

1. All development is required to reduce the risk of surface water flooding, through separating foul and surface water flows and incorporating Sustainable Urban Drainage Systems that reduce surface water run-off.

2. All development must promote an integrated approach to water management through greening and incorporating rainwater storage for reuse and irrigation. In addition:
    a. major development must maximise the multifunctional benefits of Sustainable Urban Drainage Systems including improving biodiversity, amenity, cooling and water quality and/or
    b. site allocations within the N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North N4 Canning Town, N5 Custom House, N6 Manor Road and N17 Gallions Reach Neighbourhoods must implement blue-green infrastructure runoff reduction interventions or Sustainable Urban Drainage systems on 50 per cent or more of their site area.

3. There is a presumption against impermeable hard-standing on domestic gardens and public open space.

4. All major development and any new development falling within a Critical Drainage Area must reduce surface water run-off to greenfield run-off rates through the application of Sustainable Urban Drainage Systems and other design considerations, which:
    a. maximises the use of Sustainable Urban Drainage Systems and follows the Drainage Hierarchy of the London Plan (2021); and
    b. has regard to the recommendations of the latest Newham's Surface Water Management Plan and Local Flood Risk Management Strategy; and
    c. delivers a water sensitive design, having regard to the guidance set out in Newham's Sustainable Drainage Design and Evaluation Guidance (and any subsequent updates); and
    d. where culverted watercourses are present, investigates opportunities for de-culverting.

5. All major development and any new development falling within a Critical Drainage Area must be accompanied by a Surface Water Drainage Strategy that includes:
    a. the pre and post development run-off rates and water quality impacts, ensuring run-off is clean and safe; and
    b. the ownership, management and maintenance arrangements of any Sustainable Urban Drainage System features; and
    c. in the limited circumstances where it can be demonstrated that site conditions prohibit the achievement of greenfield run-off, that a rate as close as feasible to greenfield will be achieved within the constraints, while maximising additional Sustainable Urban Drainage Systems benefits of the proposal.

Planning obligation

- Appropriate contributions may be required from development towards on site-specific mitigation including sustainable drainage systems and/or de-culverting. For major development, and where there is a need, more direct delivery of water infrastructure improvements may be required. It is expected that applicants must work collaboratively with Newham, service providers, stakeholders and the Local Authority as the Lead Local Flood Authority to undertake this process.

Justification

3.308 The Council policy recognises the environmental and cost benefits which can be achieved from an integrated approach to water management. Sustainable Urban Drainage Systems (SuDS) are an effective flood and water management approach within the built environment, helping to protect existing and new communities from the harmful effects of surface water flooding. SuDS function by managing surface water run-off by treating it as near to the source as possible and by slowing down the rate of discharge. To deliver sustainable growth in urbanised areas like Newham, all new developments will be required to incorporate greening and drainage measures, which have many benefits including managing flood risk and disruption, water quality improvements, biodiversity, increased natural cooling, and improved amenity.

3.309 Localised flooding is already occurring on a regular basis in parts of Newham and is being raised as a key issue by local residents. With increased and heavier rainfall predicted because of climate change, the possibility of flood risk in urbanised areas from both surface water build up and subsequent sewer overflow is likely to increase even further. All new development can impact water management and quality in many ways, including creating pressure on capacity within the sewer network as well as design measures that can reduce surface water run-off and improve drainage solutions. The policy actively promotes an integrated approach to water management from small-scale design considerations, such as greening and water reuse, to larger options around SuDS.

3.310 In urban areas like Newham, it is important that all opportunities for permeable ground surface are secured. Factoring in the cumulative impacts of development, the loss of permeable ground surfaces increases surface water flood risk in the borough. Newham has experienced loss in the quantity of grassed areas as people pave over gardens or seek alternative hardstanding on ground surfaces. Given the surface water risks this presents to people, properties and public spaces across the borough there is an expectation that permeable surfaces will be used as far as possible to reduce this risk.

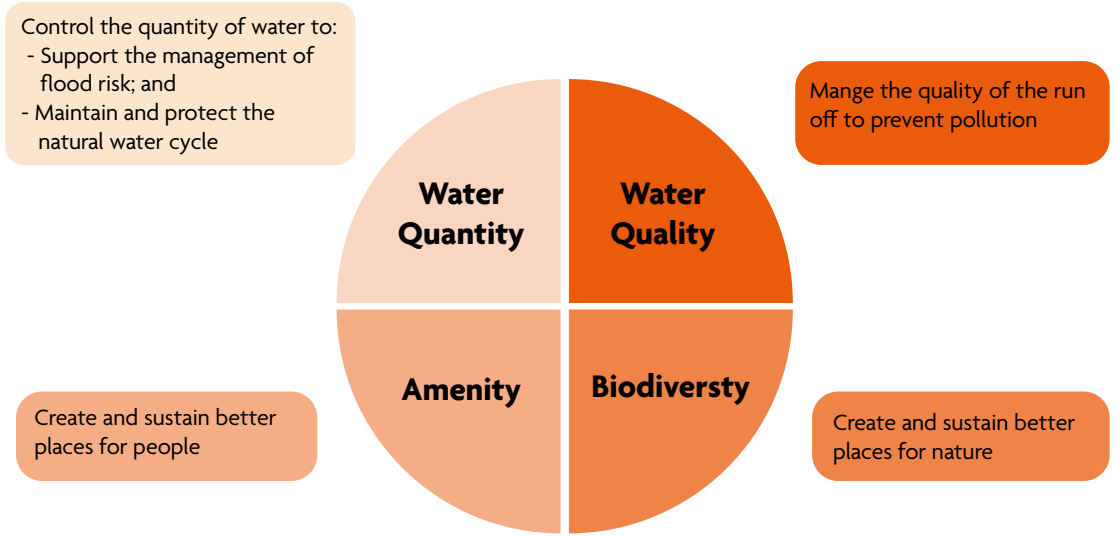
Implementation

CE8.1 and CE8.2

All new development must demonstrate the management of the risk of surface water flooding by reducing rainwater run-off and the implementation of sustainable drainage solutions. SuDS deal with excess water from the site and return it to the water system in a controlled manner, to alleviate flood risk and reduce discharge from other pollutants.

As a principal the policy expects all proposals to adopt a more integrated water management approach. This includes due consideration in the design (factoring in the land uses proposed) of the overall water management including wastewater disposal, quality, supply and flood management as well as wider biodiversity, amenity and other benefits. The Construction Industry Research and Information (CIRIA) describe the four main categories of benefits that can be achieved by Sustainable Urban Drainage Systems as shown below:

Four Pillars of Sustainable Urban Drainage System design: The SuDS Manual C753



CE8.1 and CE8.2

The selection of SuDS measures must be appropriate to the site, scale and nature of the proposed development/or operations. As set out in the Sustainable Urban Drainage Systems Hierarchy below the more natural the solution the better the benefits. Given these multi-functional benefits (including environmental and amenity) of Sustainable Urban Drainage features, design solutions should be considered and chosen according to the Sustainable Urban Drainage System Hierarchy (Table 15)

Table 15: Sustainable Urban Drainage Systems Hierarchy

	SuDS Technique	Flood reduction	Pollution reduction	Landscape and wildlife benefit
Most Sustainable	Living Roofs	✓	✓	✓
	Basins and Ponds • Constructed Wetland • Balancing Ponds • Detention Basins • Retention Ponds	✓	✓	✓
	Filter Strips and Swales	✓	✓	✓
	Infiltration Devices • Soakaways • Infiltration trenches and basins	✓	✓	✓
	Permeable surfaces and filter drains • Gravelled areas • Solid paving blocks • Porous barriers	✓	✓	
Least Sustainable	Tanked systems • Over-sized pipes and tanks • Storm cells.	✓		

Source: Environment Agency 'SuDS A Practical Guide'

CE8.1 and CE8.2

It is also important that the selection of SuDS measures considers the previous uses on the site and any potential risk of contamination resulting from surface water infiltration, which could pollute controlled waters. Particular care must be taken at locations within Source Protection Zones or upon principle or secondary aquifers, where groundwater is vulnerable. The use of infiltration SuDS must therefore be demonstrated to be appropriate in a location to manage potential adverse impacts on groundwater and avoid unacceptable levels of water pollution. In these circumstances, an Environmental Permit for discharges of surface water run-off may be required and early engagement with the Environment Agency is recommended.

Flooding from foul and combined sewers occurs when rainfall exceeds the capacity of the networks or when there is an infrastructure failure. Separating foul water and run off is vital to reduce pressure on the sewer network. All new development should be designed holistically in line with the drainage hierarchy to deliver mitigating measures to overcome constraints on capacity and the separation of foul and surface water flows must be made if possible. Where only combined sewers are present, developments must incorporate the means to separate flows as sewer upgrades are made over time.

CE8.1 and CE8.2	Early discussions on SuDS can ensure that the implementation of high quality drainage solutions maximise their benefits for the wider design of the scheme. For major development, drainage solutions and mitigation should be a consideration in any site masterplan and for smaller scale development these should be set out in design and access statements. Further guidance on opportunities to deliver blue-green infrastructure runoff reduction interventions and SuDS on each site allocation in the Royal Docks and Beckton Opportunity Area is included in the Royal Docks and Beckton Opportunity Area Integrated Water Management Strategy (2023). Arrangements for the long term maintenance of any such interventions and systems must be suitably secured.
CE8.3	Further detail on measures to implement permeable surfaces for front gardens is set out in government guidance: Guidance on the permeable surfacing of front gardens and within the Newham Sustainable Drainage Design and Evaluation Guide.
CE8.4	For major development and proposals within Critical Drainage Areas, a Sustainable Water Drainage Strategy is required, demonstrating how greenfield run-off rates have been achieved through the application of SuDS and other design considerations. Greenfield run-off rates are the run off that would occur from a site in an undeveloped natural state. It is recognised that in limited circumstances greenfield rates cannot be achieved due to site conditions. All available design options must have been explored for this conclusion to be supported.

CE8.4	Achieving greenfield run-off rates must be delivered in line with the requirement to discharge surface water run-off as high up the drainage hierarchy as possible. The drainage hierarchy is as follows: 1. Re-use on site 2. Infiltration into the ground 3. A natural watercourse 4. Surface water sewer 5. Combined sewer It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the main contributor to sewer flooding. Developers should refer to recognised best practice guidance set out in the CIRIA (The SuDS Manual C753) and Newham's Sustainable Drainage Design and Evaluation Guidance in designing ;,SuDS into the scheme. This provides further detail and advice on design, greenfield run-off rates and practical solutions to maximise sustainable drainage options within new development. In circumstances where opportunities for de-culverting are present but not possible within the realities of a site, contributions to de-culverting elsewhere in the borough may be sought.
CE8.5	A Surface Water Drainage Strategy is a report detailing how surface water can affect a site and its surroundings. Proposals must establish how water will behave on a site, estimating surface water run-off rates, viable flow pathways and likely sub-surface infiltration. This will also include consideration of SuDS and measures to reduce run-off. The strategy should follow this broad structure: • Summary of proposal within surface water volumes and flows. • Plans, drawings and specification of SuDS proposed, integrated with landscaping and materials requirements.

CE8.5

- Demonstration of SuDS considerations within the drainage hierarchy.
- Methods of water quality control provided (including management and maintenance of SuDS).

For sites where it can be demonstrated that site conditions prohibit the achievement of greenfield run-off, the Surface Water Drainage Strategy must demonstrate how the following additional SuDS benefits have been achieved: water quality and reuse, amenity and biodiversity value.

The above details may also be required for smaller scale development where development is proposed within an area at risk of flooding from all sources and for proposals likely to increase flooding locally. Identifying such sites and the provision of this detail will be undertaken in consultation with the Council as the Lead Local Flood Authority and Environment Agency, if required.

Evidence base

- London Borough of Newham Strategic Flood Risk Assessment, Parts 1 and 2, JBA Consulting (2025)
- London Borough of Newham Sequential and Exception Tests, London Borough of Newham (2025)
- Royal Docks and Beckton Integrated Water Management Strategy, Greater London Authority (2025)
- Sub-regional Integrated Water Management Strategies, Greater London Authority (2023)
- Local Flood Risk Management Strategy, London Borough of Newham (2015) and Draft Local Flood Risk Management Strategy, London Borough of Newham (2025)
- Newham Sustainable Drainage Design and Evaluation Guide, McCloy Associates and Robert Bray Associates (2020)
- The Sustainable Urban Drainage Systems Manual C753, CIRIA (2015)
- Guidance on the permeable surfacing of front gardens, Communities and Local Government, Environment Agency (2009)

Policy Links

Local Plan:

- GWS1: Green spaces
- GW2: Water spaces
- D2: Public realm net gain
- CE1: Environmental design and delivery
- W3: Utilities and digital infrastructure
- Section 4: Neighbourhoods

London Plan 2021:

- SI 12: Flood risk management
- SI 13: Sustainable drainage
- SI 14: Waterways – strategic role



TRANSPORT

3.311 High quality, sustainable transport is key to delivering many of Newham's objectives – ensuring economic growth, allowing mobility for all, improving the health and wellbeing of residents and assisting in tackling the Climate Emergency and achieving a Just Transition. To achieve these aims, we need to move away from a car dominated borough towards active and sustainable transportation. These policies cover all forms of transportation in Newham – walking, cycling, public transport, cars, vans, heavy goods vehicles, boats and planes.

3.312 As outlined in the Sustainable Transport Strategy (2024), Newham has enjoyed substantial investment in public transport (DLR, Jubilee line, High Speed 1, Elizabeth line) over the last 40 years. The borough also has a very high number of accessible stations, with only four stations without step free access. Due to this investment, the borough has a very high public transport mode share at around 40 per cent, almost six per cent higher than the inner London average.

3.313 Newham has a target of 83 per cent of all trips to be made on foot, by cycle or using public transport by 2041, set in the Mayor of London's Transport Strategy. The borough also has a low car ownership rate, with over half of residents not owning a car. However, cycling mode share in Newham is low (around two to three per cent) and the reduction in car use has plateaued in recent years.

3.314 There are also multiple barriers to connectivity across the borough, with major roads, rivers and historic urban grain limiting the movement of residents. A significant number of Newham residents are regularly exposed to poor air quality which is harmful to their health. Poor air quality is a major contributor to asthma, heart disease and other health conditions. Air quality monitoring data also clearly shows that poor air quality is concentrated along major roads in the borough.

3.315 By increasing the number of residents who use active travel modes to get around, we can improve health (obesity levels, mental health, inactivity, sedentary lifestyles), safety (road deaths) and equality (making the most of opportunities that Newham and London offers residents). Delivery of strategic transport infrastructure can speed up journey times for residents, improve connectivity and unlock large development sites for housing. Better quality public transport can also deliver substantial benefits – connecting jobs, schools and community facilities to where people live – in a fast, cost effective and convenient way. By reducing vehicle use, these benefits are amplified further, as air quality in the borough is improved, road safety is improved and public transport journeys become more reliable.

3.316 Although these policies aim to encourage active travel and public transport, it is acknowledged that electric vehicles can play a key role in delivering Newham's Climate Emergency targets – these are therefore encouraged for residents and businesses that do require vehicles.

This section contains the following policies:

- **T1: Strategic transport**
- **T2: Local transport**
- **T3: Transport behaviour change**
- **T4: Servicing a development**
- **T5: London City Airport**



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Policy T1: Strategic transport

1. Development will be required to protect and enhance the strategic transport network through:
    a. Ensuring that it will not adversely impact on the safety, functionality, reliability and viability of existing transport networks.
    b. Protecting the ongoing function and provision of strategic transport infrastructure unless formally released or agreed to be surplus or released by the relevant infrastructure provider. These include:
        i. Radar stations and sightline
        ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots/garages
        iii. Buses – priority measures, stands (including drivers' facilities), stations and depots
        iv. Protected mooring points, public river access points and piers
        v. Bridges and tunnels
        vi. Safeguarded wharves and their access requirements
        vii. London Cable Car
        viii. Rail heads and their access requirements
        ix. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements)
    c. Where appropriate, supporting the delivery of, and safeguarding land required for, future strategic transport schemes. Development that would prevent the delivery of future strategic transport schemes will not be supported.

2. Proposals for new strategic transport schemes must:
    a. unlock growth, increase public transport mode share and active travel, improve safety, accessibility and connectivity, support the delivery of a network of well-connected neighbourhoods, improve air quality and reduce carbon emissions
    b. minimise social, economic and environmental impacts, while balancing the cost and technical feasibility of a project.



Planning Obligations

- Development may be required to deliver specific infrastructure that unlocks the development site, provide funds to deliver strategic transport investment and improvements, or safeguard land for future strategic transport schemes.

Justification

3.317 Policy T1 considers strategic transport infrastructure delivered by infrastructure providers, and how developers can support (and not hinder) the delivery of this strategic transport infrastructure. Policy T2 considers infrastructure that developers could deliver and link onto their site, part of a wider transport network. Policy T3 considers how development can deliver behaviour change through onsite measures.

3.318 This policy will protect transport networks from impacts, such as a development decreasing safety on the road network, a building impacting radio coverage for transport staff, or a development overcrowding a transport network to an unsafe level. It also aims to protect the current and future Strategic Transport network, as well as related ancillary facilities from development – unless they are declared surplus. This is to ensure the ongoing successful function of the transport network. This policy also helps to protect existing Safeguarded Wharves and strategic railheads, following the safeguarding directions issued by the Secretary of State in 2021, and the policy set out in the London Plan (2021).

3.319 Newham strongly supports future strategic transport investments in the borough – such as the DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford Station. Newham will proactively protect land and access points to ensure the delivery of these projects in the future. These projects are required in order to increase public transport accessibility and capacity, support growth, improve air quality, increase residents' access to services and facilities and reduce carbon emissions from transport.

3.320 The Mayor of London, Transport for London and Newham Council and neighbouring boroughs are working collaboratively to deliver these strategic transport improvements. Long delivery timeframes mean that safeguarding projects and the land required to deliver them is crucial to ensure that strategic transport projects can be delivered at a future date.



Implementation

T1.1	Development should engage with relevant infrastructure providers such as Transport for London and London Borough of Newham Highways team at the earliest opportunity and demonstrate that the development will minimise impacts on existing transport networks. Any development that may impact strategic transport infrastructure – whether due to proximity, scale or nature of the development – should demonstrate that negative impacts on the strategic transport infrastructure are minimised to an acceptable level. This should be discussed with the relevant consultees, as outlined below, at the earliest possible stage. Applicants should refer to the London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling which provides guidance on protecting transport infrastructure. • Radar stations and sightline – **Port of London Authority and London City Airport** • Rail (National Rail and High Speed 1) lines, stations and depots – **Network Rail and High Speed 1** • Rail (Elizabeth line, Tube and DLR) lines, stations and depots – **Transport for London** • Buses – priority measures, stands (including drivers' facilities), stations and depots/garages – **London Borough of Newham Highways and Transport for London** • Protected mooring points, public river access points and piers – **Port of London Authority and Royal Docks Management Authority (RoDMA)** • Bridges and tunnels **– relevant landowners and Port of London Authority** • Safeguarded wharves and their access requirements – **Port of London Authority** • Rail heads and their access requirements – **Network Rail** • London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements), as well as height limitations – **London City Airport** • London Cable Car **– Transport for London** Mapping of transport infrastructure is available on the Council's website and on the Policies Map, however this should not be the sole resource used to understand the safeguarding requirements of consultees given the complex and technical nature of these matters.

T1.1	If a piece of strategic transport infrastructure is proposed to be formally released or agreed to be surplus by the relevant infrastructure provider, agreement for this should be provided, as well as demonstration that the development will not impact other operational transport infrastructure. Development should demonstrate that any proposal in close proximity to a future strategic transport project would not impact the delivery or function of the future project. A temporary development will still need to demonstrate that it would not impact the delivery or function of the future project. Developments should support, deliver and contribute to Strategic Transport projects where required. Specific strategic transport projects are set out in Newham Sustainable Transport Strategy, the latest Newham Infrastructure Delivery Plan, Transport for London and Mayor of London publications such as the Mayor's Transport Strategy, as well as in the Local Plan Neighbourhood policies and site allocations, where relevant.
T1.2	Applications for new Strategic Transport Projects are expected to discuss the proposals with the Council's planning and transport departments at the earliest possible opportunity. A detailed assessment should be provided and should be available for the scrutiny by the Council, local residents and other stakeholders. A wide range of delivery options should be considered and presented, alongside their assessments. At application stage, the discussions with the Council should be demonstrated in the business case or options scoping of a strategic transport project. Infrastructure providers (or others delivering new Strategic Transport projects) should work in partnership with Transport for London and neighbouring boroughs, as required.

Evidence base

- Newham Sustainable Transport Strategy, SYSTRA (2024)
- Infrastructure Delivery Plan (IDP), London Borough of Newham (2022)
- Local Implementation Plan 2022–2024 (LIP), London Borough of Newham (2022)

Policy Links

Local Plan:

- T2: Local transport
- T3: Transport behaviour change
- T5: London City Airport
- GWS2: Water spaces
- HS1: Newham's Town Centres Network

London Plan 2021:

- GG2: Making the best use of land
- GG5: Growing a good economy
- SI 14: Waterways – strategic role
- SI 15: Water transport
- T1: Strategic approach to transport
- T3: Transport capacity, connectivity and safeguarding
- T7: Deliveries, servicing and construction

Policy T2: Local transport

1. Development should support a network of well-connected neighbourhoods, improve air quality, maximise health benefits, improve accessibility, reduce carbon emissions and deliver sustainable growth. This will be achieved through:
    a. Prioritising walking, cycling and public transport and discouraging vehicle use in the design and management of developments.
    b. Supporting the delivery of the Sustainable Transport Strategy, including walking and cycling improvements.
    c. Improving accessibility and mobility for all residents.
    d. Enhancing the reliability, accessibility, attractiveness and ease of interchange of public transport services.
    e. Supporting existing or delivering new Low Traffic Neighbourhoods and School Streets, subject to consultation with local residents.
    f. Delivering Healthy Streets principles.
2. Major development should provide or contribute towards:
    a. Wayfinding in the local area, including through contributions towards Legible London. Large scale development, as well as sites delivering their own streets or multiple blocks of housing should also deliver high quality wayfinding on site.
    b. Publicly accessible cycle hire provision. This could include the provision of a cycle hire dock on the development site.
    c. Car clubs, providing an appropriate number of car club parking bays, taking into account the scale of development, existing local car club bays and local parking demand.
3. Development that supports the introduction of new transportation technology will be supported, where this new technology does not cause amenity impacts for residents or impact the wider transport network.



Planning Obligation

- Contributions may be sought for major developments for:
    - Funding for Legible London wayfinding – as per Transport for London's request.
    - Local cycle hire – as per the Sustainable Transport Strategy. This may involve monies for a docking station nearby, and/or land for a docking station to be located on site.
    - Car club parking bays and support for residents/occupiers – as per London Borough of Newham's and Transport for London's request.
    - Funding for local transport improvements – as outlined in Transport for London's and London Borough of Newham's request.
- Contributions may be sought from all developments (where required) for improvements to the public highway through agreement with London Borough of Newham Highways team (Section 278 agreement) – such as dropped kerbs or improvements to pavements.

Justification

3.321 Policy T2 considers infrastructure that developers could deliver and link onto their site as part of a wider transport network. It will deliver and increase sustainable transport, support the delivery of a network of well-connected neighbourhoods and deliver multi-functional benefits for the borough and residents. These benefits include improved air quality, health and climate, as well as sustainable growth and will help to achieve Newham's air quality and public health objectives, as well as achieve a Just Transition.

3.322 This policy supports the delivery of the Council's network of walking and cycling infrastructure, as well as pieces of local infrastructure including Low Traffic Neighbourhoods (LTNs), School Streets and local connections. The borough has plans to roll out LTNs to the entirety of the borough and School Streets to as many schools as possible. By supporting existing interventions, and helping to deliver new interventions, development will facilitate improved street environments, better connections to local facilities and improved local neighbourhoods for walking and cycling thanks to reduced traffic volumes.

3.323 The policy also supports improvements to public transport, enhancing the reliability, accessibility, attractiveness and ease of interchange of public transport services. The Sustainable Transport Strategy outlines several potential improvements across the borough, including upgrades and refurbishments of stations, the provision of step-free access and the delivery of bus priority measures.

3.324 Newham has several major barriers to movement, such as road and railway infrastructure, natural features like rivers and canals, as well the urban environment with disconnected street patterns and fence lines. For some residents, barriers to movement are worsened by other factors such as disability, age or safety fears. By delivering specific interventions outlined in the Sustainable Transport Strategy, a development will assist in overcoming these barriers, improving connections, delivering well-connected neighbourhoods and further encourage walking and cycling in the borough. Access to the three rivers that surround Newham will also be delivered, with routes along the Thames, Lea and Roding.

3.325 Through financial contributions or direct delivery, development will support local transport improvements such as bus stops, pedestrian crossings or improved highway works. The level of improvement will vary depending on the nature of the development and the nature of the necessary intervention. Development should be accessible to all residents, with work to improve access and mobility across the borough including the provision of dropped kerbs at junctions, removal of pavement parking and by ensuring that pavements are free of trip hazards/ obstructions.

3.326 This policy also seeks to deliver regional transport initiatives including the Healthy Streets approach, cycle hire provision and wayfinding, all of which are designed to help Londoners use cars less and walk, cycle and use public transport more. Embedding these approaches in Newham ensures residents benefit from access to a wider network of connectivity and the delivery of best practice design approaches.

3.327 Car clubs are an excellent way to allow occasional vehicle use by residents without encouraging car ownership or continuous car use. This policy therefore supports and encourages car clubs, providing them at a level appropriate to the scale of development, existing local car club bays and local parking demand.

3.328 The policy also seeks to enable future transportation technology that may arrive over the Plan period. Technology such as light freight by river, drones or electric vehicles are starting to be more commonplace, whereas delivery robots or fully autonomous vehicles are not yet available. The policy supports development that supports new technologies – where these do not cause amenity impacts for residents (such as noise, privacy, safety or air quality) or impact the smooth function of the transport network.



Implementation

T2.1	Development should show that the design of the scheme prioritises walking, cycling and public transport, and discourages vehicle use. Measures that improve the local public transport network or enhance existing journeys are also supported. Developments should seek to reduce barriers to movement, benefiting pedestrians and cyclists in particular. Large buildings and development sites can also act as barriers, so masterplanning should consider optimal routes to, from and around sites. Developments should demonstrate that sites are accessible for all residents, with pavements free of trip hazards/obstructions. Immediate access to a site should also be considered, with the provision of dropped kerbs at junctions or removal of pavement parking. Development should consider the recommendations of the Sustainable Transport Strategy, and support delivery of the strategy by: • supporting improved and quicker connections to employment locations, high streets, community facilities and green space; and • supporting and/or improving existing or delivering new Strategic Cycle Corridors as shown in the Sustainable Transport Strategy; and • supporting and/or improving existing or delivering new strategic walking routes identified in the Sustainable Transport Strategy such as the Greenway, Leaway, River Roding Way and Thames Path. The Neighbourhoods policies (Local Plan Section 4) provide further detail on transport improvements and projects in neighbourhoods in Newham. Development should enhance the reliability, accessibility, attractiveness and ease of interchange of public transport services.

T2.1	Applicants are expected to discuss improvements to public transport and other interventions with the Council's planning and transport departments, as well as with infrastructure providers such as Transport for London. These improvements should be discussed at the earliest possible stage. Applicants should demonstrate relevant delivery of improvements to public transport and other interventions in a Design and Access Statement, as well as in a Transport Assessment (see Policy T3). Ongoing management should be demonstrated in a Servicing and Management Strategy. A Low Traffic Neighbourhood is a predominantly residential area that is bounded by main roads, in which a set of modal filters has been installed to prevent motor vehicles from using the residential area as a shortcut. School Streets are interventions outside of schools to improve air quality, and encourage more families to make journeys to school on foot or cycle. Applicants should demonstrate that they have considered Low Traffic Neighbourhoods and School Streets in the design of their scheme, liaising with the Council's transport department and consulting on new schemes as appropriate. Developments adjacent to existing Low Traffic Neighbourhoods or School Streets should support these existing installations, delivering improved public realm, cycle parking and implementing a development that discourages vehicle trips. Where a new school is proposed, the development should embed School Street principles from the outset of design – minimising vehicle trips to/from the school. Applications for new schools are expected to discuss the proposals with the Council's planning and transport departments at the earliest possible opportunity.

T2.1	Applicants should show that the Healthy Streets principles have been considered throughout the design of the development. This should be demonstrated in a Transport Assessment (see Policy T3), and in a Design and Assess Statement.
T2.2	Applicants should demonstrate in the Design and Access Statement that wayfinding signage has been considered, with the placement of Legible London signage as appropriate. Applicants should work in partnership with Transport for London regarding the installation and ongoing maintenance of Legible London signage. For large scale development sites, a wayfinding statement or a signage strategy should be submitted for approval. Applicants should demonstrate consideration of publicly accessible local cycle hire, following the recommendations in the Sustainable Transport Strategy. Cycle hire should be available to the public, not restricted to certain occupiers or residents of a development. Applicants should work in partnership with operators as appropriate – Transport for London regarding Santander Cycle Hire, London Borough of Newham regarding Brompton Bike Hire and other operators as relevant. The Council's emerging Car Club Strategy and the Sustainable Transport Strategy outlines the preferred approach towards car clubs. Applicants should work in partnership with London Borough of Newham, Transport for London and car club providers to understand the proposed level of car club bays and level of contributions required. This should take into account the scale of development, existing local car club bays and local parking demand. Car club parking bays should be accessible to members of the public, not restricted to certain occupiers or residents of a development.
T2.3	Applications that enable or support new transportation technologies are expected to discuss the proposals with the Council's planning and transport departments at the earliest possible opportunity. It should be demonstrated that new transportation technologies and development that supports or enables new transportation technology does not negatively impact residents or the transport network. Depending on the size, scale and nature of development, this may include submission of air quality impact assessments, Transport Assessments and Travel Plans.

Evidence base

- Newham Sustainable Transport Strategy, SYSTRA (2024)
- Infrastructure Delivery Plan (IDP), London Borough of Newham (2022)
- Local Implementation Plan 2022–2024 (LIP), London Borough of Newham (2022)
- Cycle Infrastructure Design Local Transport Note 1/20, Department for Transport (2020)

Policy Links

Local Plan:

- T1: Strategic transport
- T3: Transport behaviour change
- D1: Design standards
- D2: Public realm net gain
- HS1: Newham's Town Centres Network
- Section 4: Neighbourhoods

London Plan 2021:

- T2: Healthy streets
- T3: Transport capacity, connectivity and safeguarding
- T5: Cycling

Policy T3: Transport behaviour change

1. All new development will be car free, apart from limited provision in line with the following requirements:
    a. Residential car parking (outside of blue badge spaces) will not be supported.
    b. Car parking for employment uses and town centre uses (outside of blue badge spaces) must be kept to the lowest justified quantity, within the maximum standards set by the London Plan.
    c. For residential developments, mobility scooter parking may be considered appropriate instead of additional blue badge spaces in areas of the borough with high levels of public transport accessibility and close to accessible stations.
    d. Short term operational bays allocated for specific uses – such as deliveries, servicing, pick up/drop off, taxi ranks and short term visitor parking – will be supported only where need for the bays is evidenced.

2. Development that proposes a drive-through will not be supported. Development which results in the loss of existing car parking or excess road space would be supported.

3. The limited provision of parking within the site should form part of the wider urban design strategy so that it:
    a. Is integrated with other street infrastructure including planting, Sustainable Urban Drainage Systems, Electric Vehicle Charging Points, cycle parking, public transport, and wayfinding.
    b. Considers the requirements of Electric Vehicle Charging Points, locating them out of the footway to not obstruct pedestrian movement.
    c. Where car parking is consolidated into podium structures, entrances should be located away from primary frontages and minimise inactive blank façades.
    d. Surface level parking ancillary to commercial buildings or public spaces should be designed to minimise the visual dominance of parking through use of landscaping and pedestrian public realm.

4. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant:
    a. Storage should be safe, secure, well lit, clean and prominent.
    b. Storage should be accessible to all, allowing parking of a wide variety of mobility options – including bicycles, foldable bikes, e-bikes, tandems, cargo bikes, buggies and mobility scooters.
    c. For homes with three or more bedrooms with standalone bike parking, the provision of at least one more cycling parking space than number of bedrooms is encouraged.
    d. Provision for larger 'non-standard' cycle parking (such as for cargo bikes) should comprise a minimum of five per cent of spaces, or one space where the total level of parking provision is below twenty spaces.
    e. Larger 'non-standard' cycle parking should provide enough space to park and manoeuvre a non-standard cycle, be step-free, provide a range of stand types, and be clearly labelled to avoid misuse.
    f. Major employment development should include facilities for changing and washing for cyclists.

5. Major developments should make provisions for safe and convenient charging of E-bikes and mobility scooters.

6. Electric Vehicle Charging Points will be supported where the following requirements must be met:
    a. Any new development that does provide parking (including blue badge spaces) must provide Electric Vehicle Charging Points – with 100 per cent of spaces at residential development, and 20 per cent of spaces for other types of development providing them. Remaining space should be future proofed to allow for future installation of Electric Vehicle Charging Points.

b. 20 per cent of any short term visitor or delivery parking bays should have Electric Vehicle Charging Points provided.
c. Major developments with zero car parking on site must provide contributions towards Electric Vehicle Charging Points in other parts of the borough.
d. No works that enable parking of an electric vehicle in a front garden (removal of boundary treatments, paving of front gardens, installation of dropped kerbs) will be supported.

7. All major developments and/or proposals that meet the thresholds outlined in table 16 below are required to submit a Transport Assessment.

Table 16: Transport Assessment Thresholds

Use Class	Threshold
E(a) shop (other than for sale of hot food)	1,000 sqm or greater
E(b) Food and drink	750 sqm or greater
E(g) office, research and development, non-detrimental industrial processes	2,500sqm or greater
B2 General industrial	
B8 Storage or distribution	
C1 Hotels	50 beds or above
C3 Dwellinghouses	30 units or above
E(e) Medical services	50 staff or above
F1(a) Education	2,500 sqm or above
F1(f) Place of Worship	200 or greater members / attendees
E(d) Indoor sport or recreation	1,000sqm or greater
F2(c-d) library, museum	1000 sqm or greater
Sui Generis	Case by case basis

8. Developments that meet the thresholds outlined in part 7 are also required to submit a Travel Plan. Travel Plan Statements will also be required for residential developments providing 10–30 units. Travel Plan Statements may also be required for other developments falling below these thresholds for site specific reasons.

Planning Obligation

- Contributions may be sought from developments for Electric Vehicle Charging Points to be located elsewhere in the borough – as appropriate to the scale of development.
- Occupants of new developments will not be able to apply for residential or business parking permits.



Justification

3.329 To achieve its modal share target, Newham needs a substantial shift in behaviour towards public transport and active travel. Other policies are helping to improve the infrastructure in the borough –this policy is designed to discourage vehicle use, encourage zero emission mobility and increase active travel.

3.330 The policy follows the approach laid out in the London Plan (2021), with car free development as the starting point for all new development in inner London. Residential car parking (outside of blue badge spaces) is not supported, noting that the charging of electric vehicles is not considered a valid reason to provide car parking at a residential development. A quantity of car parking could be justified for employment use and town centre uses – depending on the hours of operation, shift patterns, employment density and PTAL of the site, with the Council seeking the lowest possible quantity of parking.

3.331 This policy does not support drive-throughs in light of their specific impacts including idling vehicles, littering and health impacts from takeaway food and reduced mobility. This policy also encourages efforts to remove car parks, reduce the quantity of car parking and remove excessive use of road space, making effective use of land and kerbside space, as well as delivering Public Realm Net Gain (Policy D2).

3.332 Newham's poor air quality is exacerbated by the quantity of vehicle trips in the borough and to/from other boroughs. National policy is that all new cars and vans will be zero emission at the tailpipe by 2035, and by 2040 all new heavy goods vehicles will be zero emission at the tailpipe. This policy aims to increase the percentage of vehicles on Newham's roads that are electric, given the public health, climate emergency and air quality benefits of zero-emission vehicles.

3.333 However, this policy maintains restrictions on new car use in the borough, given the need to reduce car dependency, encourage active travel and reduce ongoing particulate emissions from vehicles. This policy encourages the uptake of zero-emission vehicles only in cases where residents and businesses require a vehicle, as outlined in the Sustainable Transport Strategy.

3.334 This policy acknowledges that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars. This policy therefore seeks to increase the number of available Electric Vehicle Charging Points, installing them where parking is proposed, and seeking contributions from car free developments.

3.335 This policy also supports the provision of short term parking bays for specific uses (such as deliveries or visitors) where the need for this can be justified and evidenced. This will ensure that a sustainable network of charging points is available across the borough, allowing the servicing and transport needs of all residents, including in car free developments, to be met by electric vehicles.

3.336 London Borough of Newham does not support new dropped kerbs, as they remove front gardens (worsening biodiversity and increasing rainwater runoff), cause accessibility issues for pedestrians and reduce the quantity of available on-street parking. Given the above, and the increasing availability of Electric Vehicle Charging Points, the desire to charge an electric vehicle is not considered a reason to deviate from this long standing position.

3.337 Over the last 20 years, large quantities of cycle parking have been provided as part of new development. As the number of people cycling in London continues to grow, the supply of cycle parking is extremely important.

3.338 The policy outlines criteria for high quality cycle parking, ensuring that they have space for, and can be used by, an increasing variety of mobility options – becoming sustainable transport storage. This could include parking for bicycles, foldable bikes, e-bikes, tandems, cargo bikes, buggies and mobility scooters. According to research by Transport for London, 76 per cent of disabled people are able to ride a cycle, but may rely on adapted cycles such as handcycles, tricycles or recumbent cycles. These types of cycles will not always be able to use standard cycle parking.

3.339 Cargo bike parking is also important to encourage greater cargo bike use – for both businesses and households – to move shopping, bulky items and children and pets around the borough, enabling these trips to be made without the use of a motor vehicle. By 2030, two thirds of cycle purchases in the EU and UK are expected to be of electric-assist models. The policy sets design specifications for non-standard cycle parking stands, in the absence of London-wide standards.

3.340 This policy also encourages greater provision of cycle parking for homes with three or more bedrooms that have standalone cycle parking. This follows feedback from residents that the space available to park bikes was not large enough, especially when families often have prams/buggies, bikes for small children as well as other mobility devices such as scooters.

3.341 This policy also plans to cement changes through the successful use of Travel Plans – long-term management strategies that aim to facilitate change in travel behaviours in favour of active, efficient and sustainable transport modes. By working to implement, monitor and report on their Travel Plan, developments will deliver on the intended outcomes.

Implementation

T3.1	All new development will be car free, apart from limited provision in line with policy. Developments should provide a quantity of blue badge spaces, (in line with London Plan (2021) standards), proportionate to the scale and nature of the development and the quantity of existing blue badge spaces in the local area. Although individual spaces are not allocated to individual residents, blue badge parking should be located as close as possible to the access point of the building they are associated to. They should be clearly marked as designated for disabled persons. The parking spaces should be on firm, level ground, as should the route to the building entry, or where this is not possible, a step-free gently sloping route is acceptable. Where developments wish to provide mobility scooter parking alongside a smaller quantity of blue badge spaces, applicants should demonstrate that the approach is suitable. The route to/from accessible public transport should be high quality, with accessible pavements and dropped kerbs. There must be a range of local services and facilities available within easy, accessible reach. Mobility scooter provision would not be appropriate in areas of poor public transport accessibility, or in areas without accessible stations. Applicants should demonstrate the blue badge provision in a Transport Assessment containing a parking stress survey, as well as through discussions with the Council's transport and occupational therapy teams. For employment uses and town centre uses, a small quantity of parking may be considered acceptable where these uses have 24-7 hours of operation, multiple shift patterns, low employment density and a very low PTAL (level 2 or below). Where parking can be justified, the Council will seek the lowest possible quantity, within the maximum standards set by the London Plan (2021). Applicants should demonstrate this in a Transport Assessment. Developments that propose short term operational bays – such as for deliveries, servicing, pick up/ drop off, taxi ranks and short term visitor parking – should evidence the need for their installation, as well as providing details on how the bays will be managed. Applicants that wish to propose on-street short term bays should discuss the acceptability of this with the Council's transport department.

T3.2	Applications containing drive-throughs will not be supported. Consideration of the proposed use will be considered under the high street policies – a suitable use would not mean that the drive-through element would be supported. Removal of car parking or car parks would not justify otherwise unacceptable uses or development. Applications that seek to remove car parking should consider parking thresholds outlined in T3.1, noting the individual requirements of each development.
T3.3	Developments should demonstrate that parking has been considered cohesively as part of the design of the urban realm and building. Where including parking as part of the design of the urban realm, good design principles are that they: • Be capable of changing and evolving over time, • Maximise biodiversity benefits, providing street trees, bushes and other plants, • Be provided in short rows of up to three car spaces, or one larger servicing parking space, interspersed with trees; and preferably on only one side of the street, • Protect trees with sturdy tree guards, • Consider sustainable drainage, including the use of permeable surfaces and rain gardens/bioswales, • Place Electric Vehicle Charging Points out of the footway, • Use street design elements such as kerb extensions, gateway treatments and pinchpoints, • Follow the Healthy Streets approach. Or where including parking inside podium structures, in a basement or otherwise inside a building, it should: • Be capable of changing and evolving over time, • Ensure that car parking cannot block or hinder access to sustainable transport storage, • Ensure that access to/from parking is easy and clear, • In larger parking structures, consider use of supergraphics and other wayfinding signage elements, • Use high quality lighting and consider of blind spots, • Provide CCTV for security. In all cases, it should have: • A broader public realm material palette, to increase the perceived footway width and reinforce pedestrian priority in any space. • Consideration of all, including older persons and disabled people • Clear, easy to understand signage Applicants should demonstrate this in a Parking Design and Management Plan, as well as in a landscaping statement.
T3.3	Applicants should demonstrate the quantity of sustainable transport storage proposed (including cycle parking in line with, or higher than London Plan (2021) standards) in a Transport Assessment. Cycle parking should meet London Cycle Design Standards. The Sustainable Transport Strategy outlines that a minimum of five per cent of cycle parking should be dedicated to larger non-standard cycle parking. This larger non-standard cycle parking should preferably be provided in the same location as standard cycle parking. It should accommodate a range of non-standard cycles, through provision of sufficient space to park and manoeuvre and step-free access. Where standard parking is provided in the form of Sheffield Stands, the end stands can be dedicated to non-standard cycles if there is sufficient space at either side. Other stand options could include ground anchors or lower and extended Sheffield Stands. All larger non-standard cycle parking should be clearly labelled to state that it is dedicated to larger non-standard cycles only.

T3.4	Applicants should demonstrate in a Design and Access Statement that they have considered the following to ensure delivery of high quality sustainable transport storage: • Who will use the storage – residents, shoppers, employees, children etc, • Security of the storage, and how it's accessed, • Consideration of routes to and from the storage– to the street, interior of the building and other facilities, • Avoiding sharp corners that a larger non-standard bike would be unable to use, • Consideration of ease of use for all, including older people, children and disabled people, • High quality lighting and consideration of blind spots, • Clear, obvious signage, • In larger parking structures, consideration of supergraphics and other wayfinding signage elements, • Potential provision of ancillary equipment – such as a manual air pump, stand and basic tools, • Provision of CCTV for security, • Accessibility for all mobility options, • Where applicable, location and access to sufficient supporting facilities including lockers and showers, with this located close by.
T3.5	Applicants should demonstrate consideration of how E-bikes and mobility scooters can be charged safely and conveniently. Applicants should demonstrate what chargers are to be provided, and how they are to be maintained and managed. Applicants should liaise with Building Control and the London Fire Brigade to understand the current recommendations and requirements.
T3.6	The Sustainable Transport Strategy sets out appropriate levels and standards for Electric Vehicle Charging Points. All parking at residential developments should include Electric Vehicle Charging Points. At non-residential developments it is expected that 20 per cent of long-term parking spaces have active Electric Vehicle Charging Point provision, with the remaining spaces being equipped with necessary infrastructure such that charging could subsequently be installed (this is also known as passive provision). For visitor parking, 20 per cent of spaces should have active Electric Vehicle Charging Points installed. For short term parking spaces (i.e. loading or deliveries) or taxi ranks, fast chargers are strongly recommended. Developments that propose Electric Vehicle Charging Points should ensure that they also meet the requirements of Policy T3.3, noting the requirements for high quality realm, and Policy T2.1c noting the requirements for accessibility. Electric Vehicle Charging Points that introduce 'trip hazards' or other obstructions to the public realm will not be supported. Signage and road markings should make clear that spaces are dedicated to Electric Vehicle Charging Points. Details regarding the charging point operator should also be clearly signed, with contact information to report faults or damage.
T3.7	Applicants should undertake a Transport Assessment following Transport for London's Healthy Streets Transport Assessment format, or the latest version if updated over the course of the Plan period. The Transport Assessment should illustrate accessibility to the site by all modes, the likely modal split of journeys to and from the site, impacts to the transport network, proposed measures to improve access or mitigate transport impacts using public transport, walking and cycling, as well as

T3.7	demonstrate compliance with other transport policies, including the London Plan (2021) Healthy Streets Approach. A Transport Assessment should be proportionate to the scale of the development. Applicants are recommended to discuss the potential transport implications of the development with the Council's planning and transport teams, as well with relevant infrastructure providers such as Transport for London. The thresholds are suggested as a guide and the Council reserves the right to vary the requirement for site specific reasons. For social infrastructure (see Local Plan Policy SI2) or smaller scale development such as in dense town centres or on a busy road, Transport Statements may be required setting out the transport impacts of development.
T3.8	Travel Plans are a long term strategy that facilitates changes in travel behaviours in light of Newham's modal share objectives. These should be drafted and submitted in line with the Council's Travel Plan guidance. Developments should implement, monitor and report on their Travel Plan, in line with the Travel Plan guidance. Where outcomes fall short of the intended outcomes in the Travel Plan, changes should be made to ensure that these outcomes are delivered. For social infrastructure (see Local Plan Policy SI2) or smaller scale development such as development in dense town centres or on a busy road, Travel Plan Statements may be required setting out measures to promote sustainable travel

Evidence base

- Newham Sustainable Transport Strategy, SYSTRA (2024)
- Infrastructure Delivery Plan (IDP), London Borough of Newham (2022)
- Local Implementation Plan 2022–2024 (LIP), London Borough of Newham (2022)
- Cycle Infrastructure Design Local Transport Note 1/20, Department for Transport (2020)

Policy Links

Local Plan:

- T1: Strategic transport
- T2: Local transport
- T4: Servicing a development
- D1: Design standards
- D2: Public realm net gain
- CE8: Sustainable drainage

London Plan 2021:

- T2: Healthy streets
- T3: Transport capacity, connectivity and safeguarding
- T5: Cycling
- T6: Car parking
- T7: Deliveries, servicing and construction



Policy T4: Servicing a development

1. Development should consider servicing and deliveries to and from their site from the outset of design.

2. Development should consider how construction deliveries to the site will be facilitated.

3. Developments should ensure that servicing, deliveries and construction traffic to and from a site can take place safely, without causing highways impacts or endangering vulnerable road users.

4. Developments are required to design schemes that enable and encourage servicing using sustainable means, such as using zero emission vehicles and/or cargo bikes.

5. Developments that service and/or deliver to other locations should:
    a. Ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for 'last mile' journeys.
    b. Provide a servicing and deliveries management plan to ensure compliance with this policy.

Justification

3.342 Department for Transport data shows that over the last 25 years, light goods vehicle use in London has increased by 54 per cent, while heavy goods vehicles use in London has decreased by six per cent over the same period. Registrations of light goods vehicles in the UK grew by 30 per cent from 2010 to 2020, compared to 13 per cent for all vehicles. One of the reasons for this rise is that over the past 20 years, there has been substantial growth in online shopping and deliveries – as shown in the Retail and Leisure Study.

3.343 As the population of Newham grows, and the quantity of deliveries and servicing increases, there will be increased demand for the limited road space in the borough – noting the requirements and considerations in the other transport policies (cycle lanes, bus priority, Electric Vehicle Charging Points). Consequently, servicing and deliveries need to be considered from the outset of design. Poor quality design could lead to impacts on the highways network, as well as decreased safety for vulnerable road users.

3.344 Construction of a development can also have impacts on the road network as well as on local residents. Servicing and deliveries to/from a construction site often use heavy goods vehicles and large vans and therefore safety must be considered. Development should also consider how a development can be constructed and how construction deliveries to the site can be managed.

3.345 Newham's poor air quality is exacerbated by the quantity of servicing and deliveries to developments in the borough and other boroughs. This policy should be read alongside Policy HS7, which directs delivery led businesses to specific locations in the borough.

3.346 National policy is that all new vans will be zero emission at the tailpipe by 2035, and by 2040 all new heavy goods vehicles will be zero emission at the tailpipe. The Sustainable Transport Strategy outlines how servicing by sustainable means can be encouraged through the use of zero-emission vehicles or e-cargo bikes, increased numbers of parcel lockers as well as freight consolidation between businesses.

3.347 Consequently, this policy encourages servicing and deliveries to take place using more sustainable means – such as zero emission vehicles and cargo bikes. Development should support and encourage the transition to zero emission servicing and deliveries, through the provision of appropriate infrastructure – following policy HS7: Delivery-led businesses.

Implementation

T4.1	Where possible, servicing and deliveries should take place off street, within the curtilage of the development. Developments located in close proximity to navigable waterways should demonstrate consideration of the use of waterways for ongoing servicing and deliveries. Development should show how servicing and deliveries have been considered in the design of the development in a Design and Access Statement, with major development demonstrating how servicing and deliveries will be managed in a Servicing and Deliveries Management Plan. Applicants are recommended to discuss servicing and deliveries in the pre application process, liaising with London Borough of Newham Highways team as appropriate.
T4.2	Development should also consider how construction deliveries will be managed. Developments located in close proximity to navigable waterways should also demonstrate consideration of the use of waterways for construction deliveries. This should be demonstrated in a Demolition and Construction Logistics Plan. Applicants are recommended to discuss servicing and deliveries in the pre application process, liaising with the London Borough of Newham Highways team as appropriate.
T4.3	Development should consider the safety implications of servicing, deliveries and construction traffic. This should be demonstrated in a Demolition and Construction Logistics Plan (D/CLP), Transport Assessment and a Servicing and Deliveries Management Plan.
T4.3	An outline D/CLP should be submitted as part of the planning application, with a detailed D/CLP submitted and implemented during the pre-construction/demolition and construction stage. The D/CLP Guidance provides further information on this. Accreditation such as Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) are recommended. Heavy Goods Vehicles are also recommended to comply with the current Direct Vision Standard. Applicants are recommended to discuss highways safety matters in the pre application process, liaising with the London Borough of Newham Highways team as appropriate.
T4.4	The Sustainable Transport Strategy outlines how servicing by sustainable means can be encouraged through the use of e-cargo bikes or zero-emission vehicles, increases in the number of parcel lockers as well as freight consolidation between businesses. Development should support these measures through the provision of appropriate infrastructure such as Electric Vehicle Charging Points, cargo bike parking and delivery lockers.
T4.5	Development should demonstrate how deliveries and servicing to other sites will occur using sustainable or zero emission means. This could include details of vehicles, Electric Vehicle Charging Points and cargo bikes within a Servicing and Deliveries Management Plan.

Evidence base

- Newham Sustainable Transport Strategy, SYSTRA (2024)
- Infrastructure Delivery Plan (IDP), London Borough of Newham (2022)
- Local Implementation Plan 2022–2024 (LIP), London Borough of Newham (2022)
- Demolition and Construction Logistics Plan (D/CLP) Guidance, London Borough of Newham (2024)
- Cycle Infrastructure Design Local Transport Note 1/20, Department for Transport (2020)

Policy Links

Local Plan:

- T1: Strategic transport
- T2: Local transport
- T3: Transport behaviour change
- J1: Employment and growth
- HS7: Delivery-led businesses

London Plan 2021:

- T7: Deliveries, servicing and construction



Policy T5: London City Airport

1. Development at London City Airport that consolidates ancillary airport infrastructure will be supported, where this makes the most efficient use of land and creates land availability for other employment generating uses that are suitable for close proximity to the airport.

2. Development proposals at London City Airport must mitigate negative impacts on local residents. Development which would result in an increase in unacceptable negative impacts to existing local residents and to development proposals for new homes and their future residents, will not be supported.

3. Development that facilitates the development or use of zero carbon technologies at the airport will be supported, where this does not adversely impact local residents.

4. Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike.
   This could include:
   a. Development that reduces the level of car parking on site.
   b. Development that makes improvements to public transport and active travel access to the airport.

5. Development proposals at London City Airport should work to support local residents into airport and aviation related jobs.

6. Development in proximity to the airport needs to consider a range of factors, including the Agent of Change principle, noise and height limitations.



Planning obligation

- Contributions may be sought to mitigate negative impacts from airport development where appropriate.
- Contributions may be sought from airport developments for Our Newham Work.
- Contributions may be sought from airport developments for improved public transport and active travel access to the airport.

Justification

3.348 London City Airport is one of London's major airports. Destinations include Europe and other parts of the UK, with a mixture of business and leisure travel. Between 2000 and 2019, the number of passengers using the airport grew from around 1.5 million a year to 5 million a year. Two thirds of passengers access the airport using public transport, the highest proportion of any airport in the UK. However, 53 percent of staff in 2023 used private cars to travel to the airport.

3.349 Since opening in 1987, the airport has been expanded several times. The current planning permission for the airport was granted in 2016 by the Secretaries of State for Transport and Communities and Local Government.

3.350 The airport is one of the largest private sector employers in the borough and a catalyst for investment in East London. National policy states

that the best use should be made of existing airport capacity, as well as the need to support long term economic growth. National policy also notes that a priority is making best use of existing runway capacity at all UK airports.

3.351 Residents have told us they do not support an increase in the number of flights (actual aircraft movements) or a reduction in the extant respite period – especially in light of Newham's declaration of a Climate Emergency and Air Quality commitments.

3.352 In addition, the area around London City Airport is transforming rapidly from a predominantly industrial area to an increasingly residential and mixed use part of the borough, providing new homes and jobs at a scale of significance to the whole of London. The location of a major airport in a rapidly densifying part of central London is unique and careful land use management has ensured that current scale and nature of the airport – as secured in the City Airport Development Programme (CADP) Permission (13/01228/FUL) and associated conditions – is able to operate within this emerging context.

3.353 As the planning authority, the Council has limited powers regarding the airport and the use of the site. Our approach in exercising these powers is to balance these different objectives by working with the airport to enable its current aviation role to continue on a consolidated and more efficient site. This includes ensuring greater community benefits are secured from changes, including access to stable, well paid jobs in the aviation industry and adjacent industries.

3.354 We also support improvements to surface access to the airport by sustainable means, and would support development that facilitates this – such as Electric Vehicle Charging Points and carpooling. The policy also encourages a reduction in the quantity of parking at the airport site alongside efforts to increase public transport and active travel mode share.

3.355 We also support efforts by London City Airport to achieve net zero, and would support development that facilitates this – such as solar panels and removal of fossil fuels from the airport site. The Council acknowledges that zero or low emission technology for commercial air travel is in a very early stage and that airlines, the airport and the Council are unaware of the requirements for such technologies. As we are unaware of what zero or low emission commercial aviation will look like, this policy requires that residents will not be adversely impacted by new technology.

3.356 By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported.

3.357 London City Airport has historically been a passenger focused site, with very small freight volumes. In light of this – the Council would not support dedicated freight planes using the airport or a large increase in freight volumes on passenger aircraft, especially given the consequential rise in goods vehicle trips that would result from these flights. Nor are proposals to introduce helicopters and other noisy aerial uses such as commercial sized drones supported, in light of the adverse impacts to local residents and housing sites in close proximity to the airport.

Implementation

T5.1	Development should show how it will make the best use of the limited airport site, enabling land to be unlocked for other employment uses that are suitable for close proximity to the airport, subject to other policies. This could include uses that support or complement the airport. This should be demonstrated in a Design and Access Statement.
T5.2	The City Airport Development Programme (CADP) Permission (13/01228/FUL) was granted in 2016. This permission replaced all of the previous planning permissions at the airport. The planning conditions and planning obligation on the CADP Permission are therefore the only ones that regulate the airports operations.

T5.2

It includes conditions which:

- Allows for 111,000 actual aircraft movements per calendar year.
- Restricts flight numbers on specified days (Saturdays, Sundays and bank holidays).
- Manages the hours that aircraft can take off and land, with exemptions when delays have occurred.
- Restricts any non-fixed wing aircraft including helicopters, tilt rotors or gyrocopters.

The Council considers that any changes to the size, function, operating hours and frequency of the airport activity will have impacts on existing and future residents.

Development should therefore demonstrate how negative impacts on existing and future residents will be mitigated. Examples of impacts that would need to be mitigated include noise, vibration, smell and air quality. Mitigation should be demonstrated in documentation submitted as part of a planning application. Works to mitigate impacts may be secured.

Where negative impacts would be unacceptable even following mitigation, development would not be supported.

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.

T5.3

The Council is supportive of ongoing research and development to increase the use of zero carbon technologies in the airport's operations. This is on the condition that any new technology does not lead to unacceptable impacts on existing residents and future housing developments and their occupants. Examples of impacts that would need to be mitigated include noise, vibration, smell and air quality.

Under the Aircraft Noise Categorisation Scheme we are required to check that a new aircraft meets the established noise limits. The airport also need to demonstrate that new aircraft won't cause a wake turbulence impact within one year of being introduced.

T5.4

Improvements to surface access which would be supported are those that would improve sustainable access for local residents and staff to get to/from the airport. Examples could include reduction of car trips in the early morning and late at night, improvements to active travel around the Royal Docks and improved connections to ExCeL and local hotels.

The Sustainable Transport Strategy indicates that the Council does not require an Elizabeth line station at the airport to facilitate the levels of growth in the Royal Docks.

Development that improves sustainable access to the airport site should demonstrate the modal shift that will result. A Transport Assessment and Travel Plan should be submitted as appropriate to the scale of development, as per Policy T3.

T5.5

Development at the airport should liaise with the Council's economic regeneration and Our Newham Work teams at the earliest opportunity to support local residents into airport and aviation adjacent jobs.

This should be demonstrated at the time of submission, with the quantity of local residents supported into airport and aviation adjacent jobs secured.

T5.6	Development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission. Neighbourhoods subject to airport height constraints are the following: N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach. This could include noise, air quality, safety, bird risk, wider Agent of Change principles, and height limitations (including construction cranes). Development in proximity to the airport has the potential to impact on airport safeguarding. Applicants should discuss the potential implications of the development with London City Airport and the Council's planning team as early as possible. Details regarding height limitations, noise contours and the Public Safety Zone can be found on the Council's website. The outcomes of discussions with London City Airport should be shared with the Council as part of any application.

Evidence base

- Newham Sustainable Transport Strategy, SYSTRA (2024)
- Infrastructure Delivery Plan (IDP), London Borough of Newham (2022)
- Local Implementation Plan 2022–2024 (LIP), London Borough of Newham (2022)

Policy Links

Local Plan:

- T1: Strategic transport
- T2: Local transport
- T4: Servicing a development
- D7: Neighbourliness

London Plan 2021:

- GG2: Making the best use of land
- GG5: Growing a good economy
- E4: Land for industry, logistics and services to support London's economic function
- E7: Industrial intensification, co-location and substitution
- E11: Skills and opportunities for all
- T8: Aviation
- D13: Agent of Change



WASTE AND UTILITIES

3.358 Sustainable waste disposal, collection and management are the foundations of a healthy city. As a member of the East London Waste Authority, it is important that Newham works with its east London neighbours (the London Boroughs of Redbridge, Barking and Dagenham and Havering) to manage waste capacity across East London. The London Plan 2021 sets a target for Newham to manage an apportioned quantity of London's household, commercial and industrial waste: 383,000 tonnes by 2021 and 407,000 tonnes by 2041. The Joint East London Waste Plan (2012), which is being updated, will set out in detail which existing waste sites in Newham will be safeguarded to meet this target.

3.359 Alongside the updated Joint Waste Plan, the Local Plan's waste and recycling policies will guide the management of waste in new developments and the operation of waste sites. These policies can help ensure that waste is managed in a sustainable manner, reducing the amount of waste generated and minimising the environmental and amenity impacts of processing waste. Working in tandem with the Joint Waste Plan update, the policies encourage the improvement of waste site operations. The policies also seek to enhance the quality of waste and recycling stores within housing and commercial developments (town centre, office and employment uses). Historically, Newham has had some of the lowest recycling rates in the country as a result of the high density developments delivered in the borough. As such, it is important that new developments support the delivery of the circular economy and help improve the Authority's reuse and recycling rates.

3.360 Utility infrastructure relates to the provision of facilities to deliver a range of critical functions such as providing heat, power, digital connectivity and communications, drainage, water supply and wastewater removal. These are necessary for quality of life and a functioning economy. The NPPF requires Local Plans to align growth needs with infrastructure delivery as a component of sustainable development. This includes undertaking assessments of the quality and capacity of infrastructure, including utilities, to meet demand.

This section contains the following policies:

- **W1: New or improved waste sites**
- **W2: Waste management in developments**
- **W3: Utilities and digital connectivity infrastructure**



Policy W1: New or improved waste sites

1. Developments that propose waste sites should include an appropriately detailed and resourced waste operator management plan demonstrating details of:
    a. vehicle movements within the site, demonstrating there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other vehicles; and
    b. how dust, mud or debris build up will be minimised on hard surfaces outside designated waste storage or processing areas; and
    c. site surfacing, ensuring the integrity of this surface can support frequent movement of heavy goods vehicles around the site; and
    d. where and how waste is stored, how material drop heights from tipping will be minimised and stockpile height limits; and
    e. any water or odour neutralising misting system to prevent the escape of dust or odour from the site, and its maintenance; and
    f. wheel washing facilities to ensure vehicles do not track mud or debris around the site or onto the highway; and
    g. how vehicles will be sheeted and securely covered where carrying materials likely to generate dust or odour onto the public highway; and
    h. how any build-up of dust or mud will be monitored and reduced where it would inhibit the safe and efficient operation of the site; and
    i. site maintenance and record keeping.



Justification

3.361 The policy sets out requirements for waste sites to provide waste operator management plans, to avoid amenity impacts associated with waste uses. While quality standards will be partly addressed through Environment Agency permits, the policy seeks to secure best practice through site layouts, design and regular maintenance checks. These requirements will help to ensure that sites do not produce significant amounts of dust emissions or track mud or dirt onto the highway.

Implementation

W1.1	Waste facility management plans should be submitted as a standalone document for waste sites (see glossary for definition). They should specify the throughput of the site and make reference to Environment Agency permit requirements where relevant. For the purposes of W1 part 1.c, details of how the surfacing will be cleaned, monitored and maintained should be provided to support the safe and efficient operation of the site and prevent the build-up of mud and/or windborne material.

Evidence base

- Evidence Base for the East London Joint Waste Plan, Anthesis (2021)

Policy Links

Local Plan:

- D6: Neighbourliness

London Plan 2021:

- SI8: Waste capacity and net waste self-sufficiency



Policy W2: Waste management in developments

1. New residential development should provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole. Waste storage facilities within residential developments should be designed to avoid any adverse amenity impacts.

2. Major residential development proposals should be accompanied by a Waste Management Plan that gives evidenced regard to the requirements of Newham's most up-to-date Waste Management guidelines for new developments.

3. Major residential developments on site allocations should provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/or which residents can use as a space for tool sharing.

4. Developments should provide only one waste management solution or technology on site.

5. Non-residential developments should give evidenced regard to the requirements of Newham's most up-to-date Waste Management guidelines for new developments. Applicants should identify the types of businesses intended for any units proposed on their site and ensure that adequate storage capacity is provided for the likely quantity of waste generated. Waste and recycling stores for non-residential uses should be separated from residential waste and recycling stores.

6. Major non-residential developments should seek to provide waste management services as part of the service charges to businesses, with one contractor appointed for all business waste collections.

7. Provision of waste storage and collection should be informed through early engagement with relevant London Borough of Newham service areas.

8. Developments that propose alternative waste management technologies, including those site allocations that require the delivery of an automated vacuum waste collection system, should be discussed at an early stage of design with the waste and recycling team. Automated vacuum waste collection systems should be able to collect dry recyclables, organics and residual waste as separate streams.

Justification

3.362 Policy W2 seeks to set quality standards for the design of waste and recycling stores in new developments. It is recognised that Newham's recycling rates are noticeably below the East London Waste Authority's target for Newham to achieve a minimum 28 per cent recycling rate for Local Authority Collected Waste by 2030.[47] The quantity and high density nature of developments in Newham has historically made it challenging for the Authority to meet its recycling targets. Accordingly, the policy sets best practice criteria for the delivery of waste storage facilities within new developments, providing convenient access and use for residents and minimising potential amenity impacts. This includes encouraging the delivery of 're-use and circular economy rooms' on site allocations, allowing residents to leave belongings they no longer require for other residents to use or functioning as a space for tool sharing. The policy also provides requirements for commercial developments (town centre, office and employment uses), and allows for the delivery of innovative waste collection systems such as underground storage or automated vacuum collection systems where agreed with Newham's Waste and Recycling team.

[47] East London Waste Authority Joint Strategy for East London's Resources and Waste 2027 - 2057 (2022)

Implementation

W2.1	The amenity of future residents and neighbours should be considered when designing waste storage facilities for new developments, taking into consideration Newham's Waste Management Guidelines for Architects and Property Developers or any replacement guidance.
W2.2	As a minimum, Waste Management Plans should set out: • How private housing units are designed to provide adequate internal storage, usually within the kitchen, for the segregation of recyclable materials from other waste. The design of private housing units should be future-proofed to allow for the potential future storage of food waste bins. • The provision and management of on-site composting facilities for use by residents and caretakers, including individual compost bins in private gardens and community composting sites in major developments. • How the waste will be delivered from private housing units to waste and recycling stores and the path from these to the vehicle, taking into consideration convenience for residents and the needs of people with disabilities. Residents should not have to travel further than 30m from their front door (excluding vertical distances travelled by stairs or in a lift) when carrying refuse and recycling. • How the waste storage arrangement for the entire development, or individual blocks, provides satisfactory storage arrangements for domestic waste, recyclable material and the future ability to meet storage requirements for food waste collection. The size of waste and recycling stores should allow for a potential increase in waste generation and/or a change in council service provision per dwelling, including the future ability to meet storage requirements for food waste collection. A bin store's size and layout should allow for reorganisation of bins when individual bins become full, and should allow for arrangement of bins side-to-side, to allow residents to access bins from the wide front edge.

W2.2	• The location of bin stores, ensuring they will not cause significant odour impacts and considering land gradients when accessing the store. Bin stores should be located a sufficient distance from bedrooms or other habitable rooms to avoid odour impacts to residents. • How collection distances from the presentation point to the collection vehicle accord with the requirements of Newham's most up-to-date Waste Management guidelines for new developments. For the transportation of bins to collection vehicles, the distance from the presentation point to where the collection vehicle can safely stop should be no more than 15m for bins of up to 240 litres, or 10m for larger containers. • Any proposed separate collection point from the bin stores, and the method/timings for transferring waste to this location. • Storage areas for special collections of bulky household items. • The management of re-use and circular economy rooms where these are provided. • For Underground Refuge Storage (URS) systems: - Details of the maintenance of the URS system and surrounding areas/surfacing, including the marking of any URS systems that are not functioning properly, - The clearing of excess waste from URS systems, - Suitable areas of hardstanding of a suitable size for a collection vehicle with its stabilising legs fully extended, - The locking of all hatches to prevent misuse. • How vehicles will safely access from the public highway, arrive at collection points, and leave the site safely. Access and highway proposals are required to demonstrate how they respond to other significant constraints, such as landscaping, playspace, and public realm layout. Vehicle access arrangements should ensure they can accommodate the Council's vehicle dimensions and be of a suitable road strength. Swept path analysis should be provided through an application's supporting documents.

W2.2	• Details of the management and maintenance of bin areas, and how information on storage area cleanliness will be distributed to residents. Signage within the bin store should be clear, displaying information on what items can be recycled in the recycling bins. Signage should follow Resource London guidance Making recycling work for people in flats: Toolkit for the Flats Recycling Package (2020) to allow for the convenient use of bin stores by residents. • The approach to resident induction, that includes information on local organisations and businesses that will accept bulky and other items for reuse. The above guidelines should be read in conjunction with Newham's Waste Management Guidelines for Architects and Property Developers or any replacement guidance and Newham's Recycling and Waste Collection Policy.
W2.3	A reuse and circular economy room is a dedicated space for the practice of circular economy principles within a development. This can be a space for re-use of household items between residents or which residents use for tool sharing. While the policy lists examples of room uses, other examples of appropriate uses can be proposed by applicants. However, this space should be separate from any internal communal amenity space or social infrastructure on site. Applicants should set out how such spaces will be managed within their Waste Management Plan. Further guidance on the management of this space are set out in Newham's Waste Management Guidelines for Architects and Property Developers.
W2.4	Only one type of refuse vehicle should be needed to service a site. For example, if a development proposes an underground storage of waste, this should be the only waste management solution across a development to allow for efficient servicing by a suitable collection vehicle.
W2.4	If a development site is unable to deliver a single waste management solution on site, the Council's waste and recycling team should be contacted as early as possible to discuss whether they agree with this assessment and the most suitable alternative waste solution for the site.
W2.5	Further guidance on designing waste storage facilities for commercial (town centre, office and employment uses) and mixed-use developments can be found in Newham's Waste Management Guidelines for Architects and Property Developers or any replacement guidance.
W2.6	This requirement will help to minimise the environmental impacts of these developments, reducing vehicle movements and fuel consumption, minimising impacts on congestion, air quality and decreasing carbon emissions.
W2.7	The outcome of these discussions should be reflected in the development's Waste Management Plan.
W2.8	Discussion of alternative waste management technologies with Newham's waste and recycling team will help to ensure the development can provide vehicle collection capacity, and allow for interrogation of the feasibility of providing such technologies. Such technologies could include Underground Refuse Stores (URS) or automated vacuum waste collection systems. Design of these alternative technologies should follow the guidance set out in Newham's Waste Management Guidelines for Architects and Property Developers or any replacement guidance. In addition to Newham's most recently published waste management guidelines, Newham's Recycling and Waste Collection Policy contains additional guidance on the management and maintenance of URS systems. This guidance should be considered when designing URS systems for new developments.

W2.8	Those site allocations that are required to provide automated vacuum waste collection systems are: • Beckton Riverside; • Silvertown Quays; • Connaught Riverside; • Thameside West; and • Parcelforce.

Evidence base

- Evidence Base for the East London Joint Waste Plan, Anthesis (2021)

Policy Link

London Plan 2021:

- D6: Housing quality and standards
- SI7: Reducing waste and supporting the circular economy



Policy W3: Utilities and Digital Connectivity Infrastructure

1. All major development proposals will be expected to meet all the requirements below:
    a. Undertake effective engagement with utility providers (including gas, water supply and sewer system/wastewater, electricity, energy, digital connectivity and communications) at the pre-application stage to ensure the construction approach and end design address providers' requirements, to ensure utilities networks and connections can serve the development and to ensure any existing infrastructure assets are not affected by the development.
    b. Demonstrate that there is sufficient utility infrastructure capacity both on and off-site to meet the demand of development during the construction and operation phases, taking into consideration the cumulative impact of current and proposed development. Where there is an identified deficit in utilities capacity to meet the needs of the development, proportionate contributions will be sought towards studies or upgrades where necessary. Developments likely to have a significant impact on utility infrastructure capacity, which may limit the delivery of future developments in the area or key objectives in this Plan, may be refused or required to delay delivery until sufficient capacity is delivered to meet their needs.
    c. Demonstrate that the spatial, visual, amenity, environmental and transport impacts of existing or permitted utilities infrastructure on the proposed development utilities infrastructure will be minimised.

2. Projects set out in the Infrastructure Delivery Plan (IDP) will be supported in principle. All utilities infrastructure proposals (including upgrades and expansion) will need to meet all requirements below:
    a. Align with growth requirements and support the creation of new neighbourhoods and economic opportunities.
    b. Support the requirements set out in the Spatial Strategy and Neighbourhoods Policies in the Local Plan.
    c. Demonstrate that the spatial, visual, amenity, environmental and transport impacts of proposed utilities infrastructure on neighbouring developments will be minimised.

3. All new development, including road and rail schemes, should incorporate future-proofed ducting to accommodate utilities connection requirements, rectify existing, and avoid future, pipe misconnections, and be designed to accommodate access and safety considerations in relation to key utilities infrastructure including high voltage cabling.

4. All development within 800m (including on site allocations) of Beckton Sewage Treatment Works will be required to undertake an Odour Impact Assessment and respond with appropriate mitigation.

5. Major developments should prioritise connections to heat networks only where the source of the heat network is, or planned to be, sufficiently decarbonised to be considered a renewable energy or is a waste heat source, to support the transition to create zero emission solutions for clean and integrated energy systems.

6. Major development proposals (including those within employment areas) should improve digital connectivity by:
    a. providing sufficient ducting space for full fibre connectivity for end users; and
    b. promoting digital inclusivity by addressing gaps in digital connectivity and reducing barriers to digital access including affordability; and
    c. supporting digital connectivity infrastructure projects. Undertaking effective engagement with Counter Terrorism Security Advisors at the pre-application stage to ensure security is appropriately considered.

Planning Obligations

- Contributions to support future studies exploring sufficiency of utilities infrastructure capacity or utilities upgrades may be secured.

Justification

3.363 This policy seeks to ensure that sufficient utilities infrastructure is provided to ensure new developments and neighbourhoods in Newham have access to power, heat, fresh water, sewage and digital connectivity. The successful delivery of high quality utilities infrastructure is critical to enable wider plan objectives to be met, particularly around the climate emergency and sustainability, delivering a modern economy and to meet the needs of development and growth in Newham. As such the policy sets out an integrated, facilitating and place-based approach to utilities planning, design and delivery. For digital infrastructure the policy aims to harness growth that builds on Newham's good digital connectivity to homes and places of employment.

3.364 In addition, the policy seeks to address the challenges created as new development starts to be delivered in close proximity to existing infrastructure facilities and networks. This requires the delivery of high quality sensitive design to better integrate utilities into the urban landscape as well as managing potential amenity and neighbourliness impacts.

Implementation

W3.1	Applicants must proactively engage with utilities providers at the pre-application stage to design-in suitable connections and future proofed solutions to ensure construction and occupation demands are supported by sufficient utilities capacity. Utilities sufficiency must be included in the Infrastructure Sufficiency Statement as part of the application. This must set out expected demand, factoring in the cumulative impacts of growth in the area and the influence of climate change on future demands, and provide evidence there is sufficient capacity from utility providers both on and off-site to meet this need. Applicants must also engage with utilities providers at the pre-application stage to discuss their development proposals and intended delivery programme to assist with identifying any potential utility network and reinforcement requirements in order for utilities providers to undertake the necessary upgrades. Where required, developments which result in capacity constraints must ensure that any necessary infrastructure upgrades (both on or off-site) are delivered ahead of the occupation of the relevant phase(s) of development. Developments which place an unusually large demand on utilities provision, such as data centres on power networks, must demonstrate that meeting their requirements will not undermine the ability for future planned housing and employment development, required to meet targets set out in this Plan. If this cannot be demonstrated, such developments may be refused or conditions (with attention to phasing) may be applied to ensure sufficient capacity is provided in advance of their delivery. Proposals for new and expanded utilities are expected to make the most efficient use of space whilst addressing any potential environmental and amenity impacts e.g. noise, smells, vibration. Where relevant, utilities proposals with installations on ground level should address potential transport impact e.g. highways and circulation. Proposals should demonstrate through an options appraisal that the favoured scheme is the most appropriate in terms of spatial and environmental impacts, costs and feasibility. Applicants must use the Greater London Authority's Infrastructure Mapping Tool, to assess infrastructure capacity, understand the existing utilities' conditions and planned utilities infrastructure to identify future requirements and to support growth in London.

W3.1	Development proposals should ensure the existing utility assets are not affected and should reflect best practice guidance including those published by statutory consultees and utilities providers, including Environment Agency, National Grid, Thames Water and UKPN. Developments should demonstrate how these design guides and principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.
W3.2	The Infrastructure Delivery Plan sets out specific infrastructure improvement and delivery requirements to support the anticipated growth in the borough over the plan period. Utilities proposals including energy, telecommunications and digital connectivity infrastructure, and water infrastructure as set out in the Infrastructure Delivery Plan will be supported subject to requirements in the Spatial Strategy and Neighbourhood Policies in the Local Plan. All infrastructure proposals will be assessed against agent of change requirements under Local Plan Policy D6 and requirements in other relevant parts of the Local Plan.
W3.3	New developments should demonstrate sufficiency in ducting space to accommodate existing and planned utilities connection. Development proposals should be designed to address existing misconnection of wastewater infrastructure on-site and ensure the proposal will not create new misconnection. Developments should demonstrate how the safety and access requirements as set out in the best practice guidance including those published by statutory consultees and utilities providers, including Environment Agency, National Grid, Thames Water and UKPN have been applied in the design and how the impact of the assets has been reduced through good design.
W3.4	Odour Impact Assessments will need to be submitted incorporating details of good scheme design and mitigation measures to address odour impacts from existing odorous uses in the vicinity.

W3.4	Mitigation which resolves potential conflicts may be necessary for development to proceed. Any necessary mitigation should be completed ahead of the occupation of developments in the vicinity. Advice should be sought from Newham's Environmental Health team at the pre-application stage highlighting any key issues with proposals relating to odour. Proposals should have regard to the latest Institute of Air Quality Management Guidance on the assessment of odour for planning.
W3.5	Connections to decarbonised heat networks are an increasingly important driver for heat network deployment and objectives in the plan to transition to carbon free development. Proposals for new networks will need to demonstrate that they are utilising renewable energy or is a decarbonised waste heat source through the submission of an Energy Statement and in accordance to Local Plan Policy CE2. Proposals for extended networks will either need to demonstrate the above or have an agreed plan in place that will be implemented in the lifetime of the plan. Proposals seeking connections to heat networks should support zero carbon ambitions. Heat networks should be designed, constructed and managed (including decarbonising the energy source) with regard to the London Heat Network Manual II (May 2021). The London Heat Map (including proposals within Heat Network Priority Areas) should be used by applicants to identify opportunities to connect to existing or future planned energy networks. This should be undertaken in liaison with the Greater London Authority's energy infrastructure team. Applicants should have regard to existing Heat Networks established within Stratford and the Royal Docks.

W3.6	The provision of high quality digital infrastructure and communications infrastructure is an essential component of modern neighbourhoods and the delivery of sustainable and inclusive growth in Newham. Proposals must improve digital connectivity and should focus on affordability, security, sufficiency of power and resilience to ensure provision of digital infrastructure meets the current and future needs of Newham and London. Further guidance on planning for digital infrastructure will be set out in the emerging Greater London Authority's sub-regional Digital Strategy and Digital Connectivity Infrastructure London Plan Guidance. Applicants must proactively engage with Counter Terrorism Security Advisors of the Metropolitan Police at the pre-application stage to ensure security is appropriately considered at the earliest opportunity. Contact information of a Counter Terrorism Security Advisors can be found on Police.UK.



Evidence base

- Greater London Authority Utilities Infrastructure Mapping, Greater London Authority (2015)
- London Heat Map, Greater London Authority, Greater London Authority's London Heat Network Manual II, Greater London Authority (November 2021)
- Royal Docks Digital Connectivity Study Executive Report, Arcadis (2022)
- Coordinating Utilities Infrastructure Through Local Planning, Greater London Authority, RTPI, Infrastructure Coordination (October 2020)
- Royal Docks and Beckton Riverside Power Capacity Review, Aecom (2018)

Policy Links

Local Plan:

- CE1: Environmental design and delivery
- CE8: Sustainable drainage
- D6: Neighbourliness
- J1: Employment and growth
- J2: New employment space

London Plan 2021:

- SI3: Energy infrastructure
- SI5: Water infrastructure
- SI6: Digital infrastructure
- E4: Land for industry, logistics and services to support London's economy
- D13: Agent of Change