

# WE ARE SHAPING.

# WE ARE NEWHAM.











# **OUR LOCAL PLAN.**



# **CONTENTS**

OUR LOCAL PLAN.	1
MAYOR'S FOREWORD	3
INTRODUCTION	4
ALL ABOUT LOCAL PLANS	5
OUR VISION.	10
OUR NEIGHBOURHOODS.	17
DESIGN.	25
OUR HIGH STREETS.	34
OUR COMMUNITY FACILITIES.	45
OUR ECONOMY.	55
OUR HOMES.	64
OUR GREENSPACES AND WATER SPACES.	74
OUR CLIMATE.	85
OUR TRANSPORT.	94
OUR WASTE AND UTILITIES.	103
OUR PLAN.	112



# **MAYOR'S FOREWORD**

We are commencing this refresh of our Local Plan at an exciting and challenging moment in time. As the centre of London continues to move eastwards and we prepare to welcome City Hall to the Royal Docks, we are seeing increasing interest in building new homes, starting new businesses and investing in Newham. As a Council we are seizing these opportunities – delivering new council homes and encouraging new growth industries like the digital and environmental sector to start up in Newham.

At the same time, the COVID-19 crisis exposed and exacerbated some of the deep-seated inequalities and challenges faced by many residents and businesses in our borough: high rates of unemployment, child poverty and residents in precarious and low paid jobs. Our residents are deeply affected by the housing crisis and face poorer health outcomes than in other parts of the country. These challenges are not faced equally across our borough – we know that race, gender and age all influence residents' opportunities and outcomes.

As we look forward to the COP26 climate conference in Glasgow in November, we are also reminded that our climate is in crisis and that we have a limited period of time to make meaningful changes to tackle this crisis and reduce our impact on the planet.

In the 'Towards a Better Newham' Strategy, we have set out an ambitious approach to tackle these challenges and create a fundamental shift in how our economy, society and environment work to support and improve residents' health and wellbeing, reduce poverty and structural inequalities while protecting the planet – both locally and globally. A new Local Plan provides us with an opportunity to consider how the use and development of land and buildings in Newham can deliver these aspirations.

Of equal importance, this Local Plan provides us with the opportunity to deliver our promise to 'put people at the heart of everything we do'. This means making sure the design, function and feel of neighbourhoods creates places people can call home and want to start businesses in. Key to delivering this is embedding the principles of 15-minute neighbourhoods into the Local Plan refresh: creating networks of easily accessible community and civic facilities and local shops.

Local Plan cannot be written without your ideas - and so I would urge everyone with an interest in Newham to get involved and help shape our future together.

This document is here to start a conversation – a new



**Mayor Rokhsana Fiaz OBE** 

# INTRODUCTION

## What is this document?

This document is one of the first steps in developing a new Local Plan for Newham. In this document we have started to identify the key challenges and opportunities for the borough and how we can best address these through our planning policies. This has been informed by:

- feedback we've received from residents on other consultations;
- monitoring of key outcomes;
- emerging market trends;
- new council strategies and objectives including our post COVID-19 Recovery and Reorientation Strategy; and
- requirements from changing national and regional planning policy.

Our engagement on this document is the start of the discussion which will result in a new Local Plan. Your input is an invaluable part of the preparation process for the new Local Plan and will inform the development of a vision, objectives and policies to help create a happy, healthy and well Newham for all.

The document asks questions to help capture your views.

Please feel free to respond to any or all of the questions and to comment on any other issues you feel are important or relevant to planning policy.

Please also let us know if we have missed any policy areas.

## How to be part of the conversation:

The consultation will run from 18th October 2021 to 17th December 2021.

Full details of how to submit comments can be found at <a href="www.newham.gov.uk/localplanrefresh">www.newham.gov.uk/localplanrefresh</a> or on our Local Plan Refresh consultation platform at <a href="newhamco-create.co.uk">newhamco-create.co.uk</a>.



# **ALL ABOUT LOCAL PLANS**

## What is a Local Plan?

The Local Plan is the key planning document which we will use to shape, plan and manage growth, regeneration and development across the borough over a 15 year period. The new Local Plan will set out a vision, strategic priorities, 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 in the borough
- the standards that development should meet
- what it should look like
- what services and infrastructure are needed, where
- how all residents will benefit from the growth and development

However, there are limitations on what can be controlled through the Local Plan. For example some forms of development do not require planning permission, for example 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 also operates alongside other types of regulation, such as licencing and environmental health legislation.

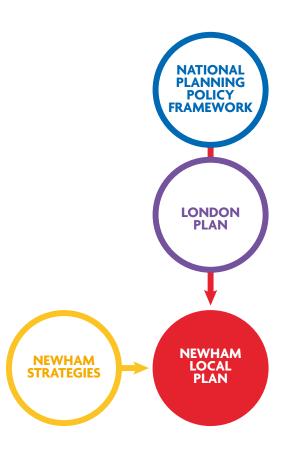
## Why do we need one? Why refresh it?

All Local Planning Authorities are required by central government to have an up to date Local Plan. Without an up to date Local Plan we lose some local discretion on deciding planning applications.

We also need to ensure that our planning policies - reflect our current needs, addresses emerging challenges and help us make the most of new opportunities. Of foremost importance is developing a Local Plan which responds to the disproportionate impact of COVID-19 on Newham – our residents, businesses and Council – and delivers an equitable recovery which creates an inclusive economy for Newham.

Finally, currently, part of Newham is included within the London Legacy Development Corporation (LLDC) planning authority. In this part of the borough the LLDC develops planning policy and makes decisions on planning applications. The LLDC is due to be disbanded and planning powers to be handed back to boroughs by 2024. We are working with the LLDC and other Host Boroughs to lobby Central Government to allow this Local Plan refresh to include the LLDC area, so that there is an up to date Local Plan, shaped by Newham residents, for our entire borough as soon as planning powers return to Newham.

## What is its relationship to other plans?



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. This means we are required to follow their policy directions unless we have sufficient local evidence to demonstrate a different approach is required.

In 2020, the Government published a White Paper called 'Planning for the Future' which consulted on broad principles for significant changes to England's planning system. As there are not yet any specific details on how and when the Government proposes to take forward these proposals, the Council is proceeding to develop our Local Plan in accordance with the current guidance on Local Plans, but we will also be developing the evidence base we need to progress to the different style of Local Plan proposed by the White Paper.

At the heart of the Local Plan refresh will be the delivery of the Council's core strategies. These include:

- Towards a Better Newham: COVID-19 Recovery and Reorientation Strategy
- Climate Emergency Action Plan
- Tackling Racism, Inequality and Disproportionality
- 50 steps to a Healthier Newham
- Social Integration Strategy

## What other information informs the Local Plan?

#### **Engagement**

- There will be 3 consultations on the Local Plan, of which this is the first.
- At each stage residents, businesses and other stakeholders will be able to tell us what they think the Plan should include, whether we have got the priorities right, whether the Plan is clear enough and if anything is missing.
- These responses will be analysed and fed into the Plan and an engagement report will be produced so you can see how we have responded to each bit of feedback.

#### **Evidence** base

- To make sure we have as good as possible understanding of what we need to build and protect, what we already have in the borough and what the market trends are, we will be commissioning and developing a series of evidence base documents.
- These documents will use and analyse quantitative and qualitative data, site visits and expert input to provide us with this information.
- For some of the key evidence base documents we will be asking residents and other stakeholders to be part of developing these documents, so we can also benefit from your expertise and lived experience of the borough.

- You can also provide feedback on the evidence base documents which will be published alongside future consultations.
- One key evidence base document is the Characterisation Study, which we have started developing with input from a wide range of residents and stakeholders.

#### **Appraisals**

- As we develop the Local Plan, we will be continuously assessing it to check how it, and possible alternative options, may impact existing social, economic and environmental factors within Newham.
- The Plan should 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.
- We have incorporated the Sustainability Appraisal into an Integrated Impact Assessment which also includes an Equalities Impact Assessment and Health Impact Assessment.
- An Equalities Impact Assessment (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.

- A Health Impact Assessment (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
- At this consultation, we are also seeking comments on the Integrated Impact Assessment Scoping Report which outlines what we consider to be the main social, economic, environmental, health and equality factors within Newham and the appraisal framework we will use to assess the Plan.
- At future Plan stages we will also be completing a Habitats Regulation Assessment, which will consider the potential impact of the Local Plan on significant natural habitats.

### Viability

- National legislation 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.
- Viability assessments will be undertaken for the next two stages of the Local Plan and will also be available to provide comments on.

## What are the stages of Plan making?

MILESTONE	INDICATIVE DATE
First Engagement and Consultation *WE ARE HERE!	Autumn – Winter 2021
Preparing the Draft Local Plan	Winter – Summer 2022
Consultation on the Draft Local Plan (Regulation 18)	Summer – Autumn 2022
Amendments to the Local Plan to create the Submission Local Plan	Winter 2022 – Winter 2023
Consultation of the Submission Local Plan (Regulation 19)	Spring 2023
Preparing the Local Plan Submission	Spring - Summer 2023
Submission of the Local Plan to the Secretary of State	Autumn – Winter 2023
Examination of the Local Plan	Winter – Summer 2024
Adoption by the Council	Autumn 2024



#### **3RD BIGGEST POPULATION**

of all London Boroughs and its projected population in 2030 is anticipated to be 465,435.



London's second MOST ETHNICALLY DIVERSE borough.



**49%** of households are classified as **LIVING IN POVERTY** and 52% of children grow up in low income households.



Average median **HOUSE PRICE** stand at £415,000 as of December 2020.



Average PRIVATE RENTS have INCREASED by around 40% between 2014 and 2019.



**WASTE COLLECTED** per head is **BELOW** the national average at 341kg per head.



Contains around 12,535 registered BUSINESSES with 94% of businesses employing less than 9 people.



2% of JOBS are within retail, administration & service and health & education sectors.



#### **MICRO-BUSINESS COUNT**

was one of the fastest growing in London, expanding by 145% between 2010-18.



Range of LEISURE PROVISION at Atherton, East Ham and Newham Leisure Centres and Manor Park Fitness Centre had around 1,753,205 visits in 2018/2019.



Has **TEN LIBRARIES**. Canning Town Library was first opened in 1893 and still operates in the original building on Barking Road.



**GREEN SPACE** covers 13.1% of Newham, compared with 39% for London as a whole.



**56%** of residents **FEAR CRIME** and antisocial behaviour in their neighbourhood.



**31.5%** of residents who are employed **NEVER WORKED FROM HOME** in 2020 (compared to 47.7% on average in London)



Resident satisfaction with **SHOPPING** facilities is high, at **88%**.



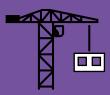
In 2018, Newham's **HIGH STREETS** hosted **52%** of retail jobs, **61%** of jobs in accommodation and food services, and **38%** of jobs in other service industry jobs.



In July 2021 the ROYAL DOCKS TURNED A CENTURY OLD. It was once the country's gateway to the world, bringing in produce from across the globe.



The LONDON PLAN classifies Stratford as a Metropolitan Centre and East Ham as a major centre.



The Royal Docks and Beckton Riverside Opportunity Area is identified as having indicative capacity for at least 30,000 HOMES and 41,500 JOBS.



Newham has the highest death rate attributable to AIR POLLUTION in England.



Newham has a **PUBLIC TRANSPORT** mode share of around 41%, almost 6% higher than the inner London average.



**CYCLING** modal share in Newham is **POOR**, around 2-3%.



Newham has the fourth lowest **CAR OWNERSHIP** rate per head in UK.



# WE ARE SHAPING.



OUR VISION.



### What is a vision?

A core part of a Local Plan is its vision which guides the whole Local Plan. It should describe what the borough will be like in the next 15 years and should be both aspirational and realistic: rooted in Newham's challenges and opportunities as well as focusing on our hopes and aspirations.

## What are we required to consider and plan for?

The National Planning Policy Framework (2021) requires us to deliver sustainable development, which is summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. This requires balancing economic, social and environmental objectives which should be pursed in mutually supportive ways.

The London Plan (2021) has sought to define how sustainable growth should be delivered in London through the creation of Good Growth policies. Growth is not supported at any cost, but only where it delivers more genuinely affordable homes, creates socially integrated and sustainable places and ensures growth brings the best out of existing places while providing new opportunities for communities.

## What will inform our vision?

### Challenges and opportunities

Newham's challenges and opportunities are outlined in more detail in each of the topic sections below. Below we have highlighted those we consider to be of most significance.

#### **CHALLENGES**

- Meeting the borough's new London Plan ten-year housing target of 32,800 new homes.
- Addressing homelessness and housing affordability: 49% of Newham residents are in poverty after housing costs are taken into account.
- Low employment rates for women and minority groups and high numbers of young people who are not in employment, education and/or training.
- Average earnings are £6,000 below the London average; 1 in 3 residents earns less than the Living Wage.
- Ensuring the benefits of growth are distributed across the borough despite the majority of growth opportunities being clustered in only some parts of the borough
- Newham's highstreets are facing significant challenges from changes in how people shop and the planning controls available to safeguard landuses.
- Ensuring we have space and funding to deliver community facilities to meet the needs of all our communities.
- Newham's disproportionate COVID-19 impact: In June 2020, Newham a 30% higher increase in benefit claimants than the London average.
- Increasing Newham's recycling rates currently the lowest in London
- Green space covers 13.1% of Newham, compared with 39% for London as a whole and the borough has 16% tree cover which is the second lowest in London.
- Newham has the highest death rate attributable to air pollution in England.

#### **OPPORTUNITIES**

- Newham is London's second most diverse borough and has one of the youngest populations in London, with an average age of 32.7
- The Royal Docks and Beckton Opportunity Area is one of the biggest opportunity areas in London, and its only Enterprise Zone.
- Growth in the no. of businesses in the last 5 years in Newham has been nearly 80% higher than comparator areas, with business (including micro businesses) and the knowledge economy amongst key growth sectors.
- New development will contribute through development specific interventions and payments of community infrastructure levy to funding facilities and infrastructure in the borough.
- Council landholdings (15th biggest landowner of all London boroughs) and the Council homebuilding programme offer opportunities to deliver.
- Tackling the climate emergency and greening the borough can support the development of green jobs, reduce urban heating and flood risk and create habitats.
- Community facilities, if planned for and resourced, can increase social integration and strengthen our communities: providing us with a sense of belonging and pride.
- Making 15-minute neighbourhoods work in the Newham context, with policies that reflect residents' visions for their neighbourhoods.
- The Royal Docks were once the largest enclosed docks in the world and is 250 acres in size with significant possibilities for leisure, nature, sports and spectacular outlooks.
- Newham will benefit from 5 new accessible Elizabeth Line stations at Stratford, Manor Park, Forest Gate and Maryland and at Custom House.

## Towards a Better Newham – Our Recovery and Reorientation Strategy

In response to the disproportionate impact of COVID-19 on Newham's residents, the borough has adopted a recovery and reorientation strategy which outlines a set of principles and delivery pillars to kick start the processes required to recover from the pandemic, as well as to address the structural challenges which were acerbated and highlighted by the pandemic.

These five principles are:

- 1. A Healthy, Happy and Well Newham
- 2. Community Wealth Building
- 3. Brighter Futures The Best Place for Children and Young People to Thrive
- 4. Tackling Racism, Inequality and Disproportionality
- 5. Putting People at the Heart of Everything We Do

These principles will be delivered through the eight delivery pillars:

- 1. Our measures of success will be the health, happiness and wellbeing of our residents
- 2. The Council is committed to enabling every resident under 25 to be safe, happy and cared for, with positive activities to secure their long-term wellbeing
- 3. The Council will take action so that all residents are supported and enabled to access work and other opportunities in the new economy
- 4. The Council will assist our residents to be healthy, happy and safe so they are supported during times of recession and are able to thrive in the new economy
- 5. The Council will create accessible and inclusive neighbourhoods which will provide residents all their social, civic and economic essentials
- 6. We will become London's greenest local economy
- 7. The Council will deliver genuinely high-quality and affordable homes for Newham
- 8. The Council will only welcome investment that secures a Fair Deal and a Fair Economy for Newham



We propose to use the Council's Recovery and Reorientation Strategy to set out the broad parameters for creating sustainable development in Newham. The vision for the Local Plan will provide an illustration of how all forms of development in different parts of the borough can deliver the five principles in line with our eight delivery pillars, to create a fairer, more equal and sustainable borough, in which people have a genuine opportunity to reach their potential and take part in community life.

Table 1 on page 17 illustrates this approach

#### Table 1

OBJECTIVE	WILL BE DELIVERED THROUGH
A Healthy, Happy and Well Newham	<ul> <li>Well-designed 15 minute neighbourhoods which encourage physical activity, active travel and access to infrastructure (including leisure, health facilities and green spaces).</li> <li>Recognising the importance of health and well-being to ensure we reduce inequalities through a health integrated approach to planning.</li> <li>Promoting healthy lifestyles at all stages of life.</li> <li>Creating safer spaces and public realm through the implementation of secured by design and activation principles.</li> <li>Improving housing quality for all.</li> <li>Supporting local employment opportunities as a key contributor to improve people's overall health and quality of life.</li> </ul>
Community Wealth Building	<ul> <li>Securing local job opportunities, education, training and skill development.</li> <li>Improving range and affordability of employment space.</li> <li>Increasing access to employment through sustainable transport infrastructure and active travel.</li> <li>Delivering the utilities and digital infrastructure required.</li> <li>Creating a greener and cleaner future in Newham which is made up of low carbon, climate resilient neighbourhoods.</li> </ul>
Brighter Futures – The Best Place for Children and Young People to Thrive	<ul> <li>Improving access to playspace, planning our streetscapes and social infrastructure in pursuit of high quality environments for young people.</li> <li>Supporting skills and career development in growth sectors.</li> <li>Protecting, delivering new, and improving access to, education and childcare provision.</li> <li>Supporting skills and career development to support young people's long term employment prospects in growth sectors e.g. green tech.</li> <li>Securing wide range of housing to meet all needs, including for care-leavers.</li> <li>Delivering genuinely affordable and family homes to support families into high quality accommodation across the borough.</li> </ul>
Tackling Racism, Inequality and Disproportionality	<ul> <li>Recognising, celebrating and designing for Newham's diverse communities.</li> <li>Creating a more equal and affordable borough which increases civic participation and inclusive opportunities for all.</li> <li>Access to genuine high quality affordable housing for all.</li> <li>Maximising local inclusive economic opportunities through skill development and job creation.</li> <li>Improving residents access to opportunities through '15 minute neighbourhoods' and improved physical and social infrastructure across Newham.</li> <li>Tackling barriers to, and supporting residents, into employment.</li> </ul>
Putting People at the Heart of Everything We Do	<ul> <li>Ensuring there is sufficient physical, social, civic and digital infrastructure as part of inclusive growth and meets the needs of existing and future communities in Newham.</li> <li>Embedding co-design principles in delivering new development.</li> <li>Improving access to high streets, community facilities (to enable support networks), and open space, through delivery of 15 minute neighbourhoods to create happier communities.</li> <li>Ensuring new development improves social integration.</li> </ul>

### Newham's neighbourhoods

As part of delivering Pillar 5 of our Towards a Better Newham: Recovery and Reorientation Plan, which aims to deliver a network of accessible and inclusive neighbourhoods, we propose to include a vision for each neighbourhood in Newham. The locations of these neighbourhoods and their visions will be developed with residents, through the Characterisation Study.

More about this proposal is included in the Newham Neighbourhoods section of this document.



## Turning our vision into policies

All the policies in the Plan will together deliver our vision. However, there are a number of key objectives which run through the plan and which are crucial to delivering the 5 principles of the Recovery and Reorientation Plan. We want to ensure these are given sufficient emphasis in the Local Plan.

This could be through a series of objectives, or we could seek to establish an overarching Reorientation Policy or policies which will highlight the key requirements that every development in Newham will have to deliver to demonstrate they are contributing towards the creation of a happy, healthy and well Newham for all.



## You Tell Us

We want the Local Plan to help create a borough where your hopes and aspirations can flourish. We would like to know what you think the vision should include.

- Should the vision and objectives be framed around the Council's Towards a Better Newham: Recovery and Reorientation Strategy?
- Is there anything missing from the vision and from table 1 to ensure we meet Newham's needs?

We would also be very interested in your answers to the following questions, which will help shape the vision for the Plan.

- What do you think makes Newham special?
- What would make Newham a better place to live? To work or run a business? To grow up in?
- What are your hopes for the future of Newham?
- What are your fears for the future of Newham?

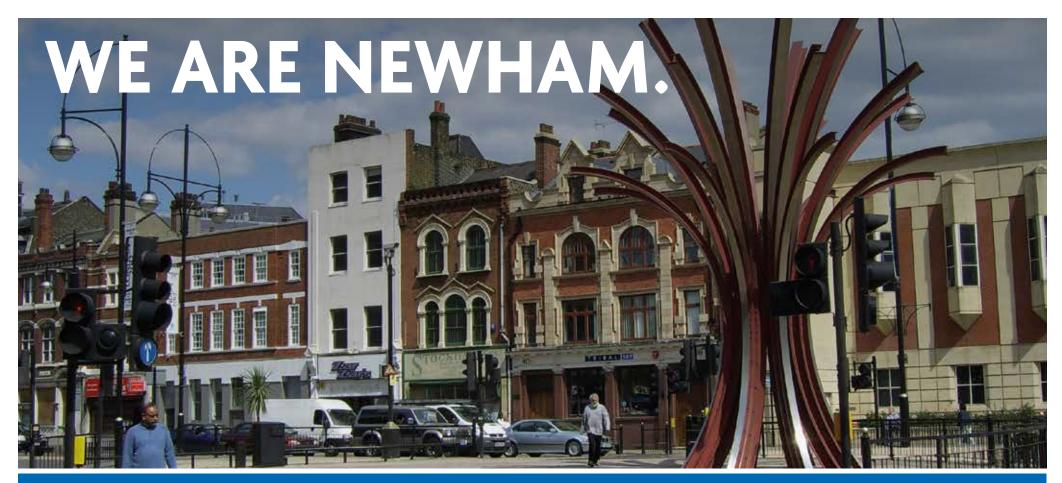
We are also interested in your views about how to best secure the delivery of this vision.

- Should we have one overarching policy which highlights what sustainable growth is in Newham? or
- Should we have a set of objectives and ensure we deliver against the 5 principles and 8 pillars in the relevant policy topics?





# WE ARE SHAPING.



OUR NEIGHBOURHOODS.



## Introduction

This topic explores how we will develop the Local Plan's spatial approach, site allocations and spatial designations.

# What are we required to consider and plan for?

### The National Planning policy Framework (2021)

We are required by national policy to set out strategic policies that set out an overall strategy for the pattern, scale and design quality of development and making sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

The areas of land safeguarded for these uses are discussed in more detail in the relevant topic chapters.

National policy also requires local planning authorities to prepare design guides or codes that reflect local character and design preferences, in order to set out expectations at an early stage. Design guides and codes can vary in their geographic coverage and their level of detail.

### The London Plan (2021)

- The London Plan sets the spatial strategy for London as a whole. It identifies Strategic Industrial Locations (the capital's main reservoir of land for industrial, logistics and related uses) and defines a network of International, Metropolitan and Major town centres. Stratford is classified as a Metropolitan Centre with potential to become an International Centre and East Ham is classified as a Major centre.
- The London Plan identifies Opportunity Areas, which are significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. These Opportunity Areas are grouped together into growth corridors.
- The Royal Docks and Beckton Riverside and the cross-border Poplar Riverside Opportunity Areas form part of the Thames Estuary North and South growth corridor. This growth corridor represents the largest concentration of Opportunity Areas in London.
- The Royal Docks and Beckton Riverside Opportunity Area is identified as having indicative capacity for 30,000 homes and 41,500 jobs. An Opportunity Area Planning Framework is being jointly prepared by the GLA, in partnership with the Royal Docks Team, TfL and the Council. The Framework will guide future development of the area and will support the review of the Local Plan.
- The Elizabeth Line East growth corridor includes the area of the London Legacy Development Corporation, with the Olympic Legacy Opportunity Area providing 39,000 new homes and 65,00 new jobs.

 The London Plan states boroughs should undertake area assessments to define the characteristics, qualities and value of different places to develop an understanding of different areas' capacity for growth. These assessments should then be used to identify suitable locations for growth and the potential scale for growth. Boroughs should also follow a design-led approach to establish optimised site capacities for site allocations.



# What new objectives and trends do we need to plan for?

The spatial approach in the Local Plan Review will be informed by a range of evidence and emerging trends, including evidence of Newham's housing, industrial, employment, retail and infrastructure needs.

- The '15-minute city' concept is an emerging principle from Paris with the aim of enabling residents to access all of their needs within a 15 minute walk or bike ride from their home. It is a way of reducing car use and encouraging active travel. It has become increasingly important as the COVID-19 pandemic has changed the way people use their neighbourhoods, town centres and high streets, how they travel and how they access local services. For these reasons, the 15-minute neighbourhood forms a key pillar of Newham's COVID-19 Reorientation and Recovery Strategy to enable every resident to live in an accessible and inclusive neighbourhood which will provide all their social, civic and economic essentials (Pillar 5). The concept is also being explored by the Mayor of London as a way of supporting the recovery of London's High Streets. It will be important for the Local Plan Review, through working with communities on the Characterisation Study, to look at how 15-minute neighbourhoods will be delivered in a Newham context.
- Since declaring a **climate emergency** in 2019 the Council has been bringing forward a range of measures to address climate change, poor air quality and waste with the aim of making Newham carbon neutral by 2030. To address climate change the Local Plan Review needs to focus growth in locations that are easily accessed by public transport, walking and cycling. It will also need to consider the provision of and access to green space and how development can contribute to the building of a Green Economy, particularly at the Royal Docks.
- There are many residents in Newham who face high levels of poverty and an unhealthy urban environment in terms of air quality, access to food and housing provision. All of these factors contribute to a healthy life expectancy that is lower in Newham than the national average for both men and women. Economic, social and environment justice underpin the Council's Community Wealth Building approach so that long-term prosperity, wellbeing and fairness for all residents in the borough is achieved and the climate emergency can be addressed. The Local Plan Review presents an opportunity to identify a pattern of development that creates a healthier environment for all residents and addresses the imbalances in access to services and facilities.

## **The Characterisation Study**

The Characterisation Study will provide key evidence to inform the Local Plan Review.

It will map the physical and functional character of neighbourhoods in the borough (such as how residents in each area move to access shops, spend leisure time, work or study), as they currently are and how neighbourhoods could evolve for the better. It will also help identify how we can deliver our housing target through a design-led approach. It will capacity test strategic and large sites and provide area-specific small sites delivery guidance.

### How is it being developed?

The Characterisation Study is being prepared with the help of consultants at Mccreanor Lavington, and through extensive engagement with local communities and in collaboration with key Council departments and other stakeholders such as the GLA (and their Royal Docks Delivery Team) and Historic England.

#### How will it inform the spatial approach?

Co-produced with local communities, the study will inform how the spatial approach reflects residents' lived experience of the borough. Through the 15 minute neighbourhood concept, it will look at how development activity can help overcome the shortcomings they identify and deliver the aspirations they have for their local areas.



## Spatial Approach – what goes where

A spatial approach identifies the overall vision, priorities and objectives for a place, setting out 'what goes where'. It means developing a strategy, based on evidence, which identifies the location, pattern, uses, scale and quality of development that will come forward in Newham over the next 15 years.

It will mean looking at Newham's neighbourhoods and assessing their unique character and role in delivering growth, providing new homes, jobs, infrastructure, services and facilities. It will also mean looking at how new development should contribute to the role of each neighbourhood and how we can create places with the homes, jobs and infrastructure that residents need.

## Our current spatial approach

The Local Plan is currently comprised of five neighbourhoods, each of which has their own policy. The neighbourhoods either reflect a single or combined Community Neighbourhood Area. Community Neighbourhood Areas are groupings of Newham's wards for community engagement and service delivery purposes.

The current Local Plan also divides the borough based on scale of potential development into:

- the 'Arc of Opportunity' which encompasses the vast majority of the strategic site allocations and major regeneration areas (Stratford and the Lea Valley, Canning Town and Custom House, the Royal Docks and Beckton); and
- 'Urban Newham', the historic neighbourhoods centred around Victorian, Edwardian and post-war estates (Forest Gate, Plaistow, Green Street, East Ham and Manor Park).

We know from recent engagement activities that the current spatial distribution of growth can lead to some residents feeling left out of the opportunities provided by recent large scale development — a feeling that 'it wasn't intended for them' and that 'change is happening to them' rather than being shaped with their needs in mind. Similarly, there can be a feeling that some parts of the borough are being forgotten and seeing less investment. The current broad neighbourhoods identified in the Local Plan also don't necessarily reflect where residents feel like they live and therefore they don't see their neighbourhoods reflected in the Local Plan.



## **Our Proposals**

1. The 15 minute neighbourhood will be central to defining neighbourhoods in Newham: informed by the engagement being undertaken as part of the Characterisation Study. This is likely to result in more neighbourhood specific policies which will provide a clear vision for each neighbourhood, their potential for growth and how development will be expected to contribute to this vision.

We want to reduce the duplication between the spatial policies and thematic policies: to ensure that the policies for 'place' and the policies for 'use' better work together to give a clear steer on what is expected from development. This will involve looking at how the spatial approach is reflected in the thematic policies and better integrating the site allocations into the spatial policies to be clearer on their contribution to each neighbourhood.

## What is a site allocation?

A site allocation is a policy which allocates a site for a particular use or development. They normally set out a preferred use or mix of uses and help safeguard the site for that use. Site allocations can also set out the principles and guidance which a new development would need to meet as well as infrastructure requirements (for example the need for a school, greenspace or better routes for walking and cycling).

National policy requires us to plan for and allocate sufficient sites to deliver the strategic priorities of the area (except where it can be demonstrated these needs can be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies) and allocate a range of suitable sites in town centres to meet retail, office and leisure needs, looking at least ten years ahead.

The London Plan requires boroughs to follow a designled approach to establish optimise site capacities for site allocations and boroughs are required to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and where appropriate, the amount of floorspace that should be provided for different land uses provided.

## What is our current approach?

The adopted Local Plan includes 31 strategic site allocations (in Appendix 1) and 36 non-strategic site allocations (in Appendix 2). The strategic site allocations, which are Newham's larger sites and are strategic in nature, provide the following information:

- The allocation which specifies uses, design and connectivity principles, tall building specifications and cross references to relevant Local Plan policies.
- Further sources of information which cross-refers to evidence base documents.
- Constraints and other advisory information including other land use designations (such as Strategic Industrial Locations).
- Partners, this is who is thought may bring the site forward for development.
- Phasing, indicating when these sites will come forward.
- A map with the boundary of the allocation, connectivity principles and any other Strategic Site Allocations and strategic industrial locations within the proximity of the site.

The non-strategic site allocations provide the following information:

- The allocation which specifies the use and cross references to relevant Local Plan policies.
- Further information such as whether the site is in a conservation area or its Public Transport Accessibility Level (PTAL).
- Partners and phasing, indicating when these sites will come forward.



## **Our Proposals**

- We will follow the **design-led approach to site allocations** to be consistent with the London Plan, informed by the work being undertaken by the Characterisation Study, the Calls for Sites exercise and the Housing and Employment Land Availability Assessment.
- Our **site allocation methodology** will consider:
  - a. whether we need to distinguish between strategic site allocations and non-strategic site allocations;
  - the size of sites we allocate to meet both national policy requirements relating to smaller sites and to ensure an even distribution across the borough; and
  - c. the role of sites in achieving the Newham's strategic priorities and achieving the vision for each neighbourhood.
- 3. We want to provide clarity to all stakeholders about what is expected from each site allocation in terms of design principles, the uses to be

in terms of design principles, the uses to be provided and how development should address specific constraints and designations. We need to balance this alongside needing to provide flexibility for the plan period and recognising that there are often different ways of bringing sites forward for development. As part of this, we will consider the level of detail to be provided for each site allocation and how this is presented through maps and diagrams to provide a more visual representation of what is expected from sites and how they will contribute to the vision for the relevant neighbourhood.

4. We will better integrate the site allocations and spatial policies by including them together rather than as an appendix so it is clearer how the site allocations contribute to each neighbourhood.





## What are Spatial Designations?

Spatial designations are designations that protect land for different uses and functions and are displayed on maps and diagrams. National policy states plans should be accessible through the use of digital tools to assist public involvement and policy presentation. Broad locations should be indicated on a key diagram and land-use designations and allocations identified on a policies map.

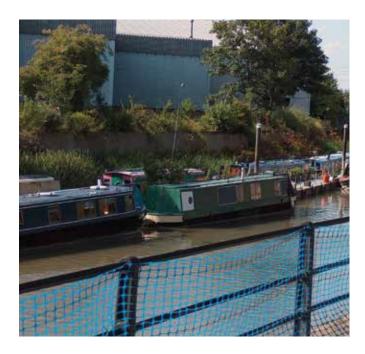
## What is our current approach?

The Local Plan policies map was adopted alongside the Local Plan and shows where area based policies and site allocations apply. It includes a wide range of spatial designations set out in the Local Plan including:

- LLDC and Lee Valley Regional Park Authority boundaries in Newham.
- Site allocations, including strategic, residential, residential-led mixed-use and community allocations.
- Conservation designations.
- Industrial and employment designations.
- Town centre, retail and community designations.
- Safeguarding for waste and transport uses and flood defences.
- Green infrastructure, including Green Belt,
   Metropolitan Open Land, Sites of Importance for Nature Conservation and Green Space.

## **Our Proposals**

The Local Plan Review will make **better use of digital tools** to makes the Policies Map clearer,
easier to use and more accessible. An interactive
policy map could allow people to can change the
mapping layers to easily see what designations
apply to a site or area. This approach will also
apply to maps and diagrams in the Local Plan to
help explain the vision for each neighbourhood
and the borough overall. We will also keep up to
date on projects being led by national government
to create more interactive Local Plans and other
interactive tools, including the ability to link policy
sections to maps.



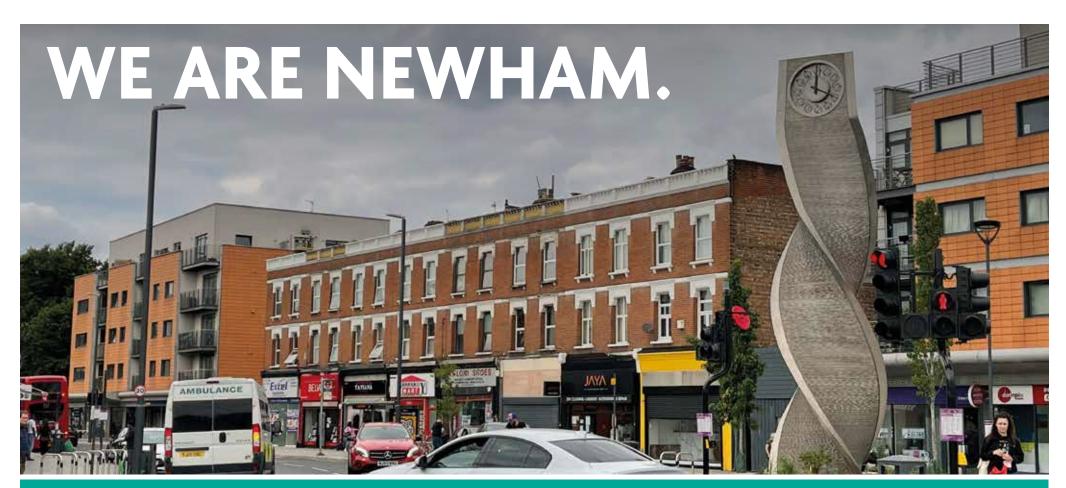
## You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?





# WE ARE SHAPING.



DESIGN.



## Introduction

The policies within this section cover what makes Newham special – its physical and social characteristics and aspirations, so that design solutions respond to and integrate with local places.

The design process is a key aspect of delivering successful places. 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 easy to move around, with clearly defined public and private areas, with easily identified functions for its different parts: residential entrances, any commercial or community uses, open and green spaces etc.;
- feel safe and welcoming at all times; and
- enhance the look and functionality of the wider neighbourhood.

In order to deliver on a vision of cohesive, engaged, sustainable, happy and healthy communities, the policies in this chapter, the whole process of design must be considered, from brief development to post-delivery maintenance.

The current Local Plan policies that relate to this topic are:

- SP3: Quality Urban Design within Places;
- SP4: Tall Buildings;
- SP5: Heritage and other Successful Place-making Assets; and
- SP8: Ensuring Neighbourly Development.

## What does our current policy seek to achieve?

### SP3: Quality Urban Design within Places

- Coherent, connected and integrated places that successfully build on distinct local identities and opportunities for mixed use.
- Quality urban design that creates successful places and communities in terms of their popularity and stability, health, safety and security, sociability, inclusivity, cohesion and economic viability.
- Integrate and enhance the existing built and natural environment assets in the borough, and take the opportunity to correct past mistakes.
- Embed Secured by Design principles.

### **SP4: Tall Buildings**

- Manage the location of buildings above 6 storeys (or 17.1m above ground), directing them primarily to areas with good public transport accessibility within town centres and strategic sites, and only where the new tall buildings would relate well to the local character.
- Require superior level of design to address the building's contribution to public realm, its appearance, materials and microclimate effects.
- Tall buildings, particularly where they exceed the height ranges set though the spatial strategy, must demonstrate added value compared to design solutions at lower heights.

### SP5: Heritage and other Successful Placemaking Assets

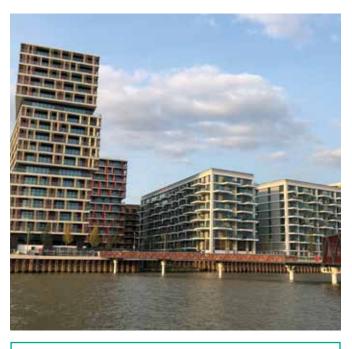
- Protect and enhance both designated heritage assets and those more informally recognised, together with their setting.
- Designate Areas of Townscape Value, and notes where these may have potential to become conservation areas.
- Designate Archaeological Priority Areas as identified by Historic England's Greater London Archaeology Advisory Service (GLAAS).

#### **SP8: Ensuring Neighbourly Development**

- Follow the 'agent of change' principle: requiring the developer of the new use/development to remediate the potential negative impact on existing lawful uses before the development happens.
- Successfully integrate different land uses, optimising development opportunities in a way that is both neighbourly and proportionate to the scale and type of development.
- Consideration of health and wellbeing at the building, site and wider neighbourhood level, through the recommended use of the Healthy Urban Planning Checklist and Building for Life guidance.

## What you've told us

- Crime and anti-social behaviour remain residents' biggest local concerns.
- Young people feel that their needs are neglected in both indoor and outdoor public spaces and Newham needs more locally accessible, free or affordable, safe and well-lit public spaces.
- Many of Newham's streets are too congested and do not offer a quality pedestrian experience.
- Cultural heritage is valued as much as the historic built fabric. There should be more public art and cultural events to celebrate the vibrant and diverse heritage of local communities.
- Residents were supportive of development that improves their local area and want to see more smaller-scale and granular development in particular.
- While development has brought positive changes to various parts of the borough, it has also created strong perceptions of physical and social division between what is perceived as 'new' and 'old'. There are concerns around who the developments are for and how the existing communities could feel part of the newer communities
- There is a desire for more social spaces, animation and better maintenance of the public realm.



#### Sources:

- Newham, Annual Survey 2019
- GLA, Join the Docks Royal Docks and Beckton Opportunity Area Framework engagement
- Newham, Newham Heritage Month
- Newham, Newham High Streets Phase 1
- Newham, We Make Newham Youth Assembly Event

## What does the data tell us?

- Fear of crime has grown to 56% overall in 2019, and is higher amongst some residents, particularly those who are either disabled, female, over 75 years, Asian or Muslim.
- 88% of residents were satisfied with their local area as a place to live in 2019, up from 84% the year before. However, people who identify as having a disability were significantly less likely to be satisfied.
- The Newham Design Review Panel (DRP) framework
  has been effective at improving the design quality of
  the major schemes it considers, as measured by the
  GLA's Quality Review Charter. Appeals monitoring
  indicates Inspectors are generally supportive
  of the Local Plan design policies, with the only
  challenges relating to assumptions of unneighbourly
  development impacts of new housing in multiple
  occupation.
- The majority of tall buildings (above 6 storeys) approved since the current Local Plan was adopted have been on strategic sites and in line with the spatial strategy set out in policy. The one key area where tall building proposals continue to be proposed outside of a tall buildings area or strategic designation is related to the cluster of tall buildings at Western Gateway, by the Excel.

- There is a continued commitment to investment in public realm improvements through developer contributions as well as Council's capital investments.
- In London, 18% of privately rented homes fail to meet the decent homes standard, compared to 10% of social rented homes and 15% of owner-occupied homes. Roughly half of Newham residents live in private rented accommodation.
- Research undertaken into living standards in England during COVID-19 highlighted that the newest dwellings were experienced as the least comfortable during lockdown: Dwellings were progressively less comfortable the newer they were, with the most recently built homes (built between 2010 and 2020) recording the lowest proportions of comfortable residents.
- National research has also highlighted the risk of school closures widening educational attainment gaps, in part because of housing inequalities. Not all children will live in homes where they have the space, privacy, and quiet to do schoolwork.

#### Sources:

- Newham Development Management records
- Newham Annual Residents Survey (2019)
- London Data Store: Housing in London
- Newham Design Review Panel Annual Report
- Place Alliance: <u>Home Comforts During The</u> Covid-19 Lockdown
- Amy Clair at Institute for Social and Economic Research, University of Essex: <u>Homes, health,</u> and COVID-19: how poor housing adds to the <u>hardship of the coronavirus crisis - Social Market</u> Foundation

## What are we required to consider and plan for?

## The National Planning Practice Framework (2021)

- All development to demonstrate good quality of design that integrates into the site's context.
- The Council has a legal duty to enhance and protect conservation areas and listed buildings, and mitigate against harm or loss of heritage assets.
- The National Design Guide provides 12 key principles for assessing the quality of design.
- The National Model Design Code provides a framework of how the principles set by the National Design Guide should be considered at local level to inform decision-making and to create place-specific design codes.

### London Plan (2021)

- Sets ambitious design standards reflecting latest best practice, including charters for recognition of high standards achieved, use of Design Review methods and guidance to enable delivery.
- Local Plans are required to undertake character assessments to support policies on design, particularly relating to design-led site capacity optimisation, and location of tall buildings higher than 21m above ground.

## Relevant London Plan Chapters and Policies:

- Chapter 1 Good Growth, Objective GG1 Building strong and inclusive communities, Objective GG2 Making the best use of land, and Objective GG3 Creating a healthy city
- Chapter 3 Design
- Chapter 4 Housing
- Chapter 6 Economy, Policy E7: Industrial intensification, co-location and substitution
- Chapter 7 Heritage and Culture, Policy HC1: Heritage conservation and growth, and Policy HC3: Strategic and Local Views.



# What new trends and objectives do we want to address?

- Encouraging residents to be active in civil society through volunteering and community participation, by improving development integration and opportunities for co-design. Newham has a track record of low levels of volunteering and civic participation, but, as identified in Newham's 'Social Integration Strategy' (2020), mobilisation during the COVID-19 pandemic has demonstrated that this can be turned around. Working in partnership with the Council, resident participation in co-design activities can help to transform our neighbourhoods for the better, bringing people together so that everyone can thrive. There are positive lessons to be learned from other councils who have invested into building resident's capacity to engage with development planning activities at every level, including through frameworks such as resident design review panels.
- Supporting young people to feel safe, happy and cared for within the built environment. Newham is a very young borough, with 24.4% of the population aged under 18 years, but half of children live in poverty and their economic and health and wellbeing outcomes are poorer than most other young Londoners. Independent mobility is vital for the physical, social and mental development and health of young Londoners. It is also intrinsically connected to equality and the everyday freedoms they have to access and occupy public space. Public realm is all the more important when our young people feel excluded due to affordability and distance barriers. As highlighted in Newham's 'Towards a better Newham COVID-19 Recovery Strategy' (2020) we need to

- address the quality of Newham's public realm to make it feel safe, address traffic and air quality, and improve the overall access to suitable and accessible play and recreation facilities within each neighbourhood. There is a wealth of research and best practice, on the added benefits of child-friendly design that we wish to explore and draw from, as well as drawing on feedback from our young people.
- Newham is the most diverse borough in the country and a key focal point for growth in London. Over the last ten years Newham's population has grown by 30%, and in the next ten years Newham will account for 30% of London's population growth. Newham also continues its historic trend of being welcoming to diverse cultures, with 72.5% of the population being from a Black, Asian and Minority Ethnic background, and over 100 languages being spoken. In spite of all this, development is rarely considered through the lenses of cultural needs, particularly in terms of housing quality and variety. We wish to explore how design solutions, particularly focusing on public realm and residential standards, could be implemented to support our resident's cultural needs and enable social integration.
- Modern methods of construction (MMC) are being promoted by government for example standardisation of processes and data integration and off-site modular construction. Following the impact of COVID-19 on the construction industry, uptake of MMC is increasing, particularly in relation to site construction logistics management. We are particularly interested in exploring the potential of new construction methods and technologies to help deliver small sites faster and more efficiently.

#### Sources:

- Newham Community Wealth Building Strategy
- Towards a Better Newham Recovery and Reorientation Strategy
- Newham Social Integration Strategy
- Modern methods of construction; GLA: Making London Child-friendly
- We Make Newham: Youth Assembly Event Findings Report 2021



## What evidence will we use?

#### **Characterisation Study**

- Will identify the special characteristics which contribute towards each of our neighbourhoods' identities, so that we can require developments to consider and enhance these elements.
- Will set out recommendations of how to tackle Newham-specific design themes: for example living with higher density, managing impact of large scale infrastructure, activity and safety in public spaces, public realm offer for a diverse and young borough, air quality mitigation and juxtaposition of industrial and residential. In order to do this, the study will assess the suitability of existing national and regional guidance and identify where there is scope to develop more local design guidance.

## Royal Docks Public Realm Framework (led by GLA's Royal Docks Team):

Focusing on the Royal Docks and Beckon Opportunity Area, the framework sets out the steps needed to deliver:

- Coherent connections across the area that will help to overcome physical and perceived barriers;
- An integrated and consistent approach to lighting, wayfinding, landscape and material palette to improve cyclist and pedestrian experience of the place and facilitate movements across the area;
- A comprehensive masterplan for the water as the foundation for its future accessibility and community and commercial use.

## Streetscape Highways Design Guide (led by Highways team)

 This document sets design standards to assist delivery of high quality, safe and accessible public realm in Newham that promotes walking and cycling.

## **Proposed policy changes:**

- Focus on the delivery of a network of public realm spaces that helps residents to live well within higher density neighbourhoods, enables social integration and celebrates diversity.

  Options include:
  - a. A public realm net gain requirement, addressing both quantitative and functional gains. Quantitative gains would be targeted at larger scale developments, and particularly those along key movement corridors and in town centres, and could be a requirement for a percentage of the overall floorspace. Functional gains could include improvements to design, greening, legibility and accessibility, and application of the Healthy Streets framework. Gains should also enable locally appropriate cultural representation (for example. through street art) and a sense of belonging and ownership by the full range of Newham's communities in public and semi-public spaces.
  - a. A public realm management plan **requirement.** Particularly in large strategic sites where new public realm is often delivered under private ownership, it is important to secure good standards of long-term maintenance that preserve the integrity and quality of the public realm, allow for multi-functionality and adaption (for example street events), and monitor environmental performance (for example traffic and footfall, air quality, biodiversity, Sustainable Urban Drainage Systems ). It could either follow the principles set out in the emerging Public London Charter, or we could develop a Newham-specific approach. This could be secured through a legal agreement linked to the planning permission (such as an s106 agreement).

- 2. Developing a network of child-friendly routes and spaces throughout the borough that reflect child and young people accessibility requirements, are safe, welcoming and diverse. These routes could make use of the opportunities presented by Low Traffic Neighbourhoods, although connectivity to key routes and public transport nodes will also require consideration.
- Promote the co-design of major developments. Newham is committed to improving resident civic participation, and particularly to enable participation of young people in borough life, with enhanced representation in place and economy. Every opportunity should be taken for honest, open and transparent collaboration between developers, infrastructure providers and the existing communities that the development affects and caters for. Options include:
  - a. Develop a set of co-design engagement standards for larger schemes, drawing on the Council's emerging Participation Framework. This is in keeping with the NPPF's recent introduction of the potential to require community engagement as part of a Design Code.
  - To explore the potential for a Young People
     Design Review Panel that would work alongside
     the existing professional Design Review Panel
     and review schemes containing certain uses.

- Provide Newham specific design guidance. We currently use national guidance, best practice knowledge disseminated through industry bodies, and London Plan guidance. Given the significant special circumstances of Newham, we wish to consider, through the Characterisation Study, the extent to which these serve Newham, and identify what further thematic guidance might be needed. Key themes explored include:
  - Promoting better health and wellbeing in the home, including potential new floorspace standards.
  - Optimising communal facilities in larger multiunit developments, including potential new floorspace standards.
  - Delivering good design around and within tall buildings (above 21m).
  - Supporting multi-generational living and other culturally-representative housing standards.
  - Managing the juxtaposition of industrial and residential.
  - Imaginative forms of site activation at the street level.
  - Air quality improvements.
  - Environmental standards and methods of construction.
- Frameworks, beyond current requirements for Secure by Design accreditation and BREEAM standards. Other frameworks could include TfL's Healthy Streets Toolkit, or the industry standard Building for a Healthy Life. Use of standard frameworks would provide a clear assessment and monitoring framework but would rely on their continued use and applicability.



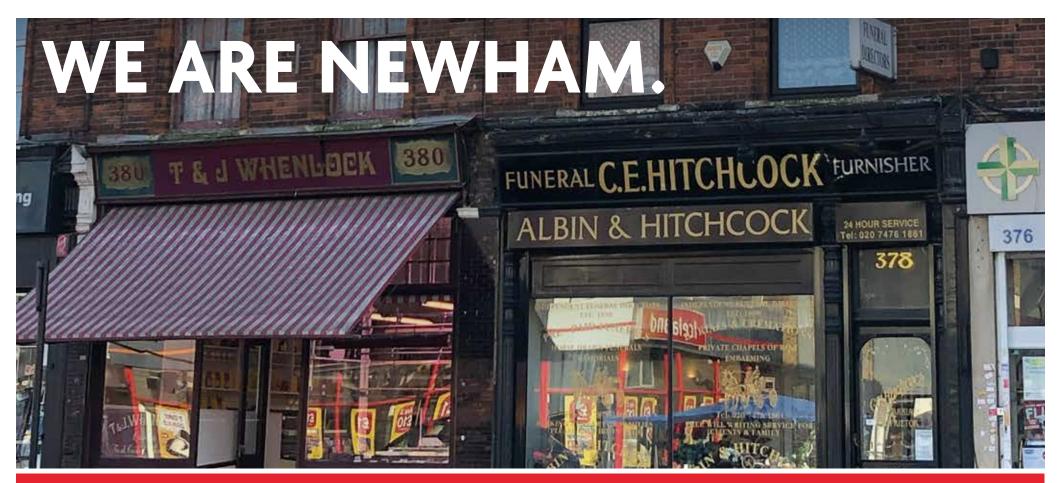
## You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- Are you familiar with any other building industry standards that we could consider?
- Should there be an expectation of 'public realm net gain' for major applications, and if so what should be the focus?
- What would you like to help co-design in your neighbourhood (for example, green spaces, streets, community buildings)?
- •How has the pandemic affected how you use your home and your perception of the quality of the space you have available?





# WE ARE SHAPING.



OUR HIGH STREETS.



## Introduction

This section considers the full range of Newham's high streets, from small shopping parades to large town centres, from retail parks to markets, and the remaining sections of out-of-centre commercial activity. Newham's high streets offer a range of functions of vital importance to the daily lives of our communities and their individual character and size, alongside their transport connectivity, provides choice and helps connect people across neighbourhoods.

The COVID-19 pandemic has further highlighted the importance of access to a range of local services usually available on our high streets, as well as the importance of quality public realm to help support and attract activity. The pandemic has also accelerated a number of behavioural trends which, alongside recent changes in national planning legislation and policy, pose challenges for our high streets.

The current Local Plan policies that relate to this topic are:

- INF5: Town Centre Hierarchy and Network;
- SP6: Successful Town and Local Centres:
- SP7: Quality Movement Corridors and Linear Gateways; and
- SP9: Cumulative Impact, in relation to Licensing Saturation Policy Zones, Primary Shopping Frontages, control of quality of leisure offer in town centres, and control of proliferation of betting shops and hot food takeaways borough-wide.

## What does our current policy seek to achieve?

### **INF5: Town Centre Hierarchy and Network**

 A defined hierarchy and network of existing and potential town centres, local centres and shopping parades where town centre uses are promoted.
 Identifies Primary Shopping Areas/Frontages within town centres.

- Encourages the loss of town centre uses to residential use in areas outside of the designated town centres network.
- A specific scale and mix of retail development in each of the town centres.

## SP6: Successful Town and Local Centres and SP7: Quality Movement Corridors and Linear Gateways

 High quality public environment for town centres and the main movement corridors that connect centres to residential areas, so that they feel safe and are attractive and convenient for everyone.

### **SP9: Cumulative Impact**

- Manages the cumulative impact generated from proliferation of certain uses, such as those that require licensing control for sale of alcohol, betting shops, and hot food takeaways.
- Improve the overall quality of leisure offer in town centres, by capping the number of betting shops, amusement arcades and hot food takeaways to 33% of the overall leisure offer.

#### Spatial policies S2-6

 Provide key objectives for each town centre in terms of broader mix of uses, character and public realm enhancement needs.

## What you've told us

- The variety of shops and range of independent offer are features residents like the most about their local high street.
- While satisfaction is generally high, people feel that there is room for improvement in Newham's high streets, particularly to improve the leisure offer and quality of the public realm, to promote placemaking, and to address the climate emergency.
- Young people feel excluded, due to places that they spend time in becoming unaffordable, and limited access to safe, well-lit and freely accessible public spaces.
- Cultural heritage is valued as much as the historic built fabric; people would like more public art, and social spaces for local communities to come together, including pop-ups and meanwhile uses.
- Crime, anti-social behaviour and cleanliness remain residents' biggest concerns regarding their high streets.
- Residents continue to be concerned about the number of betting shops, and the quality of food and the impact of rubbish from hot food takeaways.

#### Sources:

- Join the Docks Royal Docks and Beckton Opportunity Area Framework (2019)
- Newham High Streets Phase 1
- We Make Newham Youth Assembly Event (2021)

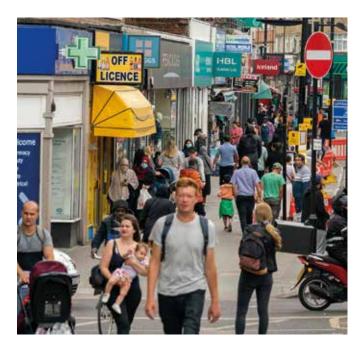
## What does the data tell us?

- The majority of residents (88% in 2019) are satisfied with their local shopping facilities. However, residents of Canning Town and Custom House, and Royal Docks were least satisfied, reflecting more limited offer in these areas which ongoing regeneration programmes are aiming to address. Green Street residents continue to be among the most satisfied with their shopping facilities, at 94%. Overall, satisfaction is lowest amongst residents who have a disability (72%).
- Pre-pandemic, vacancy rates in Newham's town centres were below national average.
- Stratford is the main focus for leisure uses in the borough, in part reflecting its metropolitan centre status, with a complementary offer within Stratford City.
- Forest Gate and East Ham are both performing relatively well in terms of overall provision of leisure uses, but the quality of provision remains low given the high number of betting shops/amusement arcades and hot food takeaways.
- The overall leisure offer within Green Street is more restricted compared to the borough's other town centres, and remains predominantly of lower quality although has been steadily improving.
- The format of East Beckton town centre, focused around the Asda Superstore and several large floorplate single-use buildings, means that it is less adaptable and provides a less diverse mix of uses than the other town centres.

- Redevelopment of Canning Town is bringing in new commercial, leisure and work floorspace, but many of the new units have stayed vacant for long periods and the town centre is overall under-performing.
- Developers of major schemes often seek to provide retail and leisure uses as a form of placemaking, but without sufficient market testing to ensure successful take-up of all proposed spaces. Indeed, research indicates that scattered commercial premises tend to be less appealing to businesses than those clustered within high streets.

#### Sources:

- Newham, Annual Survey (2019)
- Newham Development Management activity
- Newham Town Centres Monitoring Bulletin
- GLA: Vacant Ground Floors in New Mixed-Use Development



# What are we required to consider and plan for?

## The National Planning Practice Framework (2021)

- Defines the 'town centre first' approach which directs 'main town centre uses' to within the boundaries of centres identified in Local Plans. Where this is not possible, a process of sequential and impact testing of sites is usually required to demonstrate that development would not negatively impact on the vitality and viability of the centres.
- Requires Local Plans to identify not only the boundaries of town centres, but also their Primary Shopping Areas that identify concentrations of retail provision. Development sites should also be identified within or adjacent centres which can provide identified needs and improvements.
- Strongly supports the role of residential intensification as a driver of increased visitor numbers to local high streets which in turn is expected to promote vitality and viability.

# The Use Class Order and Permitted Development Rights (amended 2020)

• Following changes in 2020, the Use Classes that relate to the 'main town centre uses' are:

NPPF TOWN CENTRE USES	USE CLASS
Shops, services, gyms, restaurants and cafes, health centres, offices	E (Commercial, Business and Service uses)
Art galleries, libraries, exhibition halls	F1 (Learning and non-residential institutions)
Leisure centres	F2 (Local community uses)
Cinemas, bars and pubs, nightclubs, casinos, theatres, bingo halls, concert halls, dance halls, betting shops, hot food takeaways	Sui Generis
Hotels	C1

- These new use classes bring together more uses than the previous use classes. The use classes are important because planning permission is only required when uses change between use classes. Changes to, from and within Sui Generis classes always require planning permission.
- The government has also introduced changes to allow for some change of use to occur without planning permission. This includes the right to change from Use Class E to residential.
- The Local Plan will need to consider where and when it may be reasonable to control these flexibilities through available planning tools.



#### London Plan (2021)

- Expands the list of town centre uses to night-time economy, civic, community and social uses.
- Sets the wider regional roles of the Borough's town centres, as well as their potential to grow through the London Plan hierarchy.
- Forest Gate, Canning Town, Green Street and East Beckton: District centres serving a number of neighbourhoods.
- East Ham, and potentially Canning Town and future new centre at Beckton Riverside: Major centres serving the whole borough.
- Stratford: Metropolitan centre and Central Activities Zone overspill location, serving subregional needs, with potential for international status.

- Requires Boroughs to:
- Promote the role of town centres in building sustainable, healthy and walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.
- Plan for the adaptation and diversification of town centres in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.
- Seek the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners.
- Support flexibility for temporary or 'meanwhile' uses of vacant properties.
- Support markets in their full variety, including street markets, covered markets and specialist and farmers' markets.
- Realise the full potential of existing out-ofcentre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking.
- Manage existing edge-of-centre and out-of-centre high streets, by considering their potential for protection as local parades or business areas, and by encouraging comprehensive redevelopment.

## Relevant London Plan Chapters and Policies:

- Chapter 1 Good Growth, Objective GG1 Building strong and inclusive communities, Objective GG3 Creating a healthy city and Objective GG5 Growing a good economy
- Chapter 2 Spatial Development Patterns, Policy SD6 Town Centres and High Streets, Policy SD7 Town centres: development principles and Development Plan Documents, Policy SD8 Town centre network
- Chapter 6 Economy, Policy E9: Retail, markets and hot food takeaways.



# What new trends and objectives do we want to address?

- 15 minute Neighbourhoods to enable every resident to live in an accessible and inclusive locality which will provide all of their social, civic and economic **essentials.** The Council, as expressed in the 'Towards a Better Newham – Re-orientation and Recovery Strategy', is committed to delivering 15 minute neighbourhoods. This builds on existing social trends that have been amplified by COVID-19, 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 through the spending cycles and contributes to community wealth building. Data suggest that many local centres, and centres with a strong independent offer, have fared better during the COVID-19 pandemic.
- High streets are adapting to be about work, leisure, social experience and personalised services (for example, health, wellbeing, styling services). 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. As we move into new working patterns, with more people working from home for most of the week, there is a growing demand for smaller scale affordable workspaces. This is driving new footfall patterns in town and local centres.

• Promote health and wellbeing on the high street.

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. 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. We also want to consider how planning can support a smoke-free Newham, including tackling waterpipe smoking (shisha) which is an issue of growing concern in the borough. High street environments also offer opportunities for social interaction to help tackle mental health and social isolation, but high levels of traffic, crime and fear of crime, lack of access to health promoting food and services, and inaccessible design can negatively impact on health.

- Manage the opportunities and challenges presented by multi-channel retailing. This is a growing trend, offering customers seamlessly blended experiences between a businesses' online and physical presence. Retail businesses are rebranding their shops to be more about the shopper experience, with leisure activities and personalised in-shop support. The introduction of Use Class E with its broad range of uses further enables businesses to innovate and diversify their offer without needing planning permission. Building on the trend of click and collect services that has been growing for many years, brands are also offering specialised apps and augmented reality experiences connecting the physical environment to the business's online platform. This type of retail service delivery means that bricks and mortar shops are becoming multi-use spaces, and there is generally less need for retail space and more demand for urban warehousing and delivery lockers. In the case of food and drinks industry, the increased demand for deliveries from popular restaurants and cafes is leading to more demand for dark kitchens. The multi-channel retailing trend is also impacting SMEs, who are increasingly diversifying to online services too. Small changes could have significant cumulative impacts that could be better managed strategically at the town centre level.
- The digital infrastructure of town centres is becoming important in enabling successful competition with other centres, offering a positive experience to visitors through 'live' use of apps and social media.
- Manage town centres towards more environmentally sustainable business models, by considering the impact of growing demand for deliveries on local traffic and related air pollution – this is yet to be fully understood. Some businesses have adapted a sustainable active travel model of local delivery focused on service bikes as opposed to motorised vehicles, or through pooling deliveries to reduce the number of vans on the road. Some town centres have adopted servicing times of 6p.m. to 6a.m. to avoid commercial traffic adding to peak traffic and air pollution. Coordinated business servicing models are being explored in some areas, for example, shared management of commercial waste, high street consolidation centres, or microfulfilment centres serviced by cargo bikes or e-bikes. However, there are no set standards or guidance to help guide this growth in a sustainable way. There are also opportunities for town centres in the growth of the sharing economy (upcycling, freecycling, secondhand).
- The trend for retail parks to diversify to be more like town centres continues, further drawing away trade from established centres. Claps Gate Lane and Gallions Reach Retail Parks are examples where this has happened in recent years in Newham.

#### Sources:

- Newham Town Centres and Retail Study Update
- RSPH: Health on the High Street Towards a Better Newham Recovery and Reorientation Strategy
- Newham Social Integration Strategy
- 50 Steps to a Healthier Newham Strategy
- TCPA: The 20 Minute Neighbourhood
- GLA High Streets for All
- HGLA High Streets Adaptive Strategies
- London Collective Town Centres Post-Coronavirus
- GLA, High Streets Data Service
- SATCM Successful Town Centres developing effective strategies



### What evidence will we use?

#### **Characterisation Study**

- Will apply the '15min neighbourhood' concept and consider the extent to which people's daily needs in relation to town centre uses are met within their local area.
- Will consider the elements of the built and natural environment in Newham's town and local centres that contribute positively to their role as hubs for the local community.

#### **Town Centres Retail and Leisure Study**

• Will identify shopping and leisure patterns, and expected demand for floorspace for retail and leisure uses in various parts of the borough.

# Newham High Streets Programme (led by Regeneration team)

- Phase 1, focusing on Forest Gate, Manor Park, Green Street and Little Ilford are complete and work is underway to identify funding and mechanisms of delivering the strategies for each centre.
- Where the priorities identified can be delivered through development activity, they will inform the town centre policies of the Plan.

# Royal Docks Development & Placemaking Strategy update (led by GLA's Royal Docks Team):

 Will analyse existing and emerging neighbourhood high streets and centres to better understand and define their local function and character, as well as their potential to contribute towards the economic and cultural functioning of the area. The strategy will be supported by an implementation plan with detailed delivery activities.



### **Proposed policy changes:**

- 1. Facilitate 15min Neighbourhoods. The Characterisation Study will help identify the range of uses that people need in order to live well locally, taking into consideration local preferences and movement patterns, as well as wider market trends and service delivery models. Options to deliver 15 minute neighbourhoods borough wide, include:
  - a. Reviewing the borough-wide coverage of the centre network: Review boundaries of existing town and local centres, and look at potential for new local centre or shopping parade designations (with a clear boundary identified). Provide additional quantitative and qualitative requirements for new local centres where the boundary cannot yet be defined due to stage in on-site delivery or masterplanning. Continue to support the de-conversion of shop fronts outside of the designated network to residential or other uses where justified by local context (see also option 3 below).
  - b. Create and/or sustain a special identity for each of the town and local centres in the network. This can be enabled by promoting adaptability, innovation and diversification of uses with a focus on local enterprise (including provision of affordable workspaces), social and civic functions. See also option 4 below.
  - c. **Define Primary Shopping Areas for local**centres. This will recognise the important
    role of local centres to enabling local living,
    and we can consider how to protect these
    key frontages from the impacts of permitted
    development rights which allow conversion to
    residential.

- Take a proactive approach to enabling and managing the evening and night time economy. This could include promoting intensification and diversification of leisure and cultural uses within town and local centres in a way that reflects local character, starting with the approach set by the London Plan Policy SD 8. We could also promote Healthy Streets and Secured by Design improvements in the public realm along key movement corridors linking town and local centres to neighbourhoods to enable a safer walking and cycling environment at all times.
- Managing the impacts of growth in online shopping. Options include:
  - a. Allowing uses diversification where evidence indicates surplus of retail floorspace. See option 1 above.
  - b. Investigate the potential for developing high street consolidation centres, or microfulfilment centres in order to take advantage of economies of scale and a growing trend for multi-stakeholder coordination and management of town centres.
  - c. Promote **click and collect facilities** (including as part of micro-fulfilment centres) to help drive footfall.
  - d. Enhancements in the public realm and digital connectivity will also be key to attracting people into centres, enabling street markets, pop-up events and free, safe, accessible and inclusive spaces to rest, play and socialise.

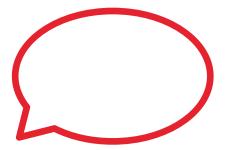
- 4. Continue to manage cumulative impacts which create unhealthy environments and promote poor health, taking into account continuing and emerging trends. We propose the following options:
  - a. Expand the cumulative impact policy managing the quality of leisure uses in town centres to also apply to local centres, ensuring that quality leisure opportunities are promoted in all localities.
  - b. Consider developing a cumulative impact policy that address dark kitchens, for example by requiring adherence to healthy catering standards through planning conditions.
  - c. Consider developing a cumulative impact policy that address waterpipe smoking (shisha) lounges or shops.
  - d. Proactively promote development of **street markets.**
  - e. Remove current policy requirement for 70% of uses in the Primary Shopping Frontage to be shops. Within the boundaries of the town centre network, flexibilities allowed by the new Use Class E can help promote more multifunctional buildings and overall diversification of uses to support the trend of centres adapting away from retail focus (see options 1 & 3 above).

- **Clarify technical requirements** that help secure the vitality and viability of the town centre network. We propose the following options:
  - a. Require market testing and meanwhile use strategy to support all proposals for town centre uses that are above the impact test floorspace threshold (currently 300sqm).
  - b. On sites that are outside the boundaries of the town centre network, require Sequential and Impact testing for all proposals incorporating Use Class E floorspace above the 300sqm threshold. To help implementation, the policy should be supported by methodology guidance to facilitate common approach and easier assessment of these tests. The policy and guidance could also address the need for conditioning of permissions to only certain parts of the overall Use Class, for example, if approving a health facility which is Class E (e) in an out-of-centre location, only allow future uses of the building to be within Class E(e) health or class E(f) childcare.
- Remove duplication between town centre policies by having individual policies for each town centre and local centre, covering all physical and functional development needs, potentially relocated in the neighbourhoods chapter of the Local Plan; and a separate technical policy (or policies) for aspects of managing town centre uses that apply borough-wide.



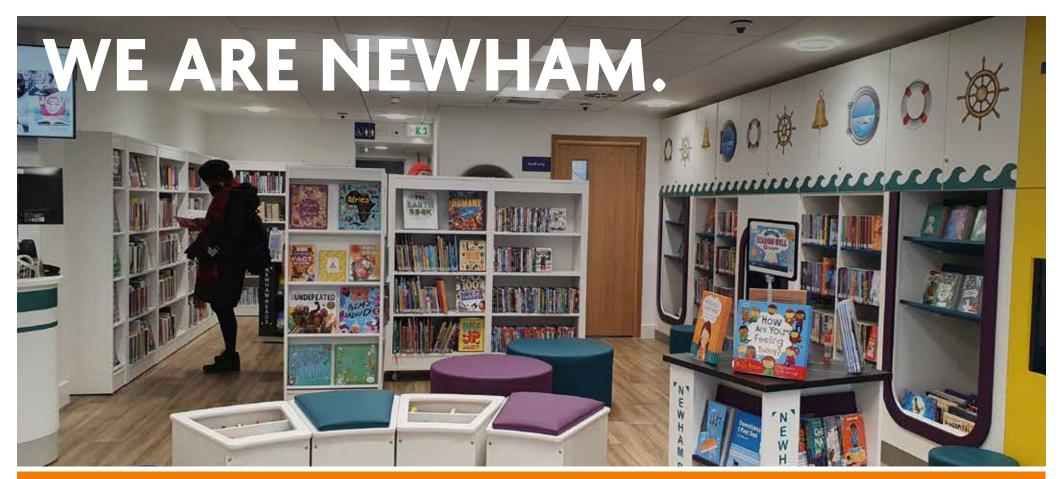
### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- What type of leisure and cultural activities would you like to see expanded into the evening and night time? What do you think are the essential elements for this to be managed successfully in terms of access, amenity impacts (e.g. noise, privacy) and health and safety?
- How far (considering travel mode and duration) do you usually travel for your shopping, leisure, education or to social events?
- What is your local high street? What would you like to see more of in your local high street?
   Anything you would like to see less of in your local high street?





# WE ARE SHAPING.



OUR COMMUNITY FACILITIES.

### Introduction

This topic covers a range of facilities that meet local and strategic needs and contribute towards a good quality of life. In the Local Plan, a 'Community Facility' is defined as a space for: education (from preschool to further and higher education) and training; health; older people's housing and specialist provision for other vulnerable people (falling into Use Class C2); social; leisure; children's play; playing pitches and fields (including multi-use games area (MUGAs)) and associated facilities; places of worship; burial spaces; community spaces (including pubs, certain Sui Generis uses, public toilets); cultural facilities; civic uses (including criminal justice and court facilities) and emergency services.

An area's social infrastructure is one of its greatest assets. Social infrastructure plays an important role in supporting and enriching people's lives. Both formal infrastructure (such as health and education provision) and informal spaces and services (like hairdressers, cafes and pubs) provide important social networks that make communities more connected and resilient. Social infrastructure can be thought of as an ecosystem of local organisations, networks and services. Planning for community facilities in London is complex. In Newham there many ways of providing social infrastructure and lots of differing community needs.

The current Local Plan policy that relates to this topic is:

• INF8: Community Facilities

# What does our current policy seek to achieve?

#### **INF8: Community Facilities**

- Facilities should be kept or re-provided where a local need exists and can be demonstrated.
- Loss of a community facility is only allowed in limited circumstances.
- Community facilities should meet the needs of new and existing communities.
- Co-location of facilities and services is encouraged.
- Health, childcare and education services are prioritised on Strategic Sites.
- Facilities should be in accessible locations and directed towards town or local centres in the first instance, with limited exceptions allowed.
- New facilities should be accessible, welcoming inclusive and open and available to all members of the local community and outside of main use and any sacred areas, operate as a multifunctional space with fair and affordable access to all.



### What you've told us

- The majority of people think our community facilities are good, in particular our Libraries (84%), Leisure and sports facilities (81%), Local health services (75%), Adult education/evening classes (69%), Under 5s early education (65%), Activities for teenagers (65%), Primary education (62%) and Secondary education (62%).
- Amongst the key priorities for the borough's Community Assemblies are inclusive and improved indoor and outdoor spaces and youth activities.
- Young people want to feel welcome, with young people feeling excluded due to gentrification. They want more indoor and outdoor spaces which young people can identify with, that allow young people of all ages to spend time together safely and free of charge with seating, lighting, shelter, activities, free Wi-Fi and dedicates spaces to study. This includes safe spaces during COVID-19. Many youth activities are too far away from where young people live. There is a particular desire for more music, arts and performance activities.
- People living and working in the Royal Docks want community and social spaces for all ages (community centres, cafes and bars); activities for young people (sports and community events were emphasised) and meanwhile uses for vacant sites to test ideas and new models of community investment.

#### Sources:

- Newham Survey 2019
- Youth Assembly Report 2021
- Newham Community Assemblies
- Royal Docks and OAPF: Engagement Report

### What does the data tell us?

- Newham's range of leisure provision at Atherton, East Ham and Newham Leisure Centres and Manor Park Fitness Centre had around 1,753,205 visits in 2018/2019. However, upgrades to many of these facilities are required in order to provide a high quality leisure offer for our residents.
- In addition to the facilities offered by the council, there is also a growing number of private gyms offering competitive membership to members of the public.
- According to the London Sport Borough Survey in 2017 more than 30% of all adults in Newham do not do enough physical activity to maintain a healthy lifestyle and are classified as inactive (less than 30 mins of moderate physical activity per week). One in five (20%) of residents never exercise, increasing to 50% of disabled residents.
- Participation in sport or physical activity is also lower in Newham (68% v 36%) than the London average and this is particularly the case for women and the white population. The tendency to be active declines as age increases.
- Previous data (Liveability Survey 2015) suggest activity levels vary considerably by Community Neighbourhood area.

- There is extensive evidence about the impact of loneliness and social isolation on people's lives, their relationships and wellbeing. It is a serious public health concern, leading to higher rates of premature mortality comparable to those associated with smoking and alcohol consumption. In Newham 1 in 5 people report feeling lonely often and 23,412 people live alone in Newham.
- Research has found that in the UK young adults, women, people with lower education or income, the economically inactive, people living alone, and urban residents had a higher risk of being lonely.
- Schools are well-recognised as facilitators of community relationships.
- Previously, Newham experienced continual increases in the number of births resulting to an increase in its overall child population. The Council responded to this need with an extensive program of schools expansions, with the majority within the primary sector. Whilst the pace of growth in births has now receded, Newham still has the third highest 0-15 aged child population in London. The greatest area of need is now in the secondary sector with the increased primary cohorts transitioning through the school system.
- Sufficiency of places for those with Special Educational Disability Needs (SEND) is a major focus of work and investment over the next five years, particularly for autism.



- There is only around 1 early years place for every
  6 eligible children in the borough. There is a wide
  variation in the number of early years places available
  per resident child at ward level. East Ham South,
  Boleyn, Plaistow North, Plaistow South and Green
  Street East have the least places available.
- Many pubs play and important role at the heart of their local communities. In 2001 there were 105 pubs in Newham, this number has now fallen to 45, the second lowest in London.

#### Sources:

- London Development Database
- Well Newham 50 Steps to a Healthier Borough.
   Part 2: The Evidence for Action
- Loneliness in Newham initiative
- LGA: Loneliness, social isolation and COVID-19
- Newham, Places for All, A School Place Planning Strategy 2020 - 2025
- Newham Childcare Sufficiency Assessment
- Public Health England: Spatial Planning for Health. An evidence resource for planning and designing healthier places
- RTPI Mental Health and Town Planning; IPPR
- Pubs and Places the Social Value of Community
   Pubs

#### National Planning Policy Framework (2021)

- Strategic policies should make sufficient provision for community facilities (such as health, education and cultural infrastructure).
- Planning should enable places which promote social interaction, including opportunities for meeting between people who might not otherwise come into contact with each other.
- Provide the social, recreational and cultural facilities and services the community needs by planning positively for community facilities.
- Guard against the unnecessary loss of valued facilities and services.
- Policies should ensure that new development can be integrated effectively with existing community facilities (such as places of worship, pubs, music venues and sports clubs).

## The Use Class Order and Permitted Development Rights (amended 2020)

• The changes outlined in the High Streets section also impact on the delivery and protection of community facilities.

#### **London Plan 2021**

- Boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure, existing health and social care facilities.
- Local Plans should identify sites for future health, social care, education, sport and recreation facilities, as justified by the relevant needs assessment.
- New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- Shared and co-location of facilities should be encouraged.
- Identify opportunities to make better use of existing sites and proposed new social infrastructure, through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
- Ensure development proposals for housing and commercial facilities incorporate suitable child care provision, encouraging nursery provision in primary schools, where there is a need.

Relevant London Plan Chapters and Policies: Chapter 5: Social Infrastructure (Policies S1, S2, S3, S4, S5 and S6).

## Relevant London Plan Chapters and Policies:

- Chapter 5: Social Infrastructure
- Policy S1 Developing London's social infrastructure
- Policy S2 Health and social care facilities
- Policy S3 Education and childcare facilities
- Policy S4 Play and informal recreation
- Policy S5 Sports and recreation facilities Policy S6
   Public toilets



# What new trends and objectives do we want to address?

• 15 minute neighbourhood approach: Pillar 5 of Newham's COVID-19 Recovery Strategy sets out that the Council will enable every resident to live in an accessible and inclusive neighbourhood which will provide all their social, civic and economic essentials. The design, characteristics and detail of our 15-minute neighbourhoods will be informed by resident engagement through our emerging Characterisation Study. It is likely that primary schools, spaces for recreation and community health and wellbeing facilities will be an important part of the mix.

- Healthier lives for all: The Local Plan refresh provides an opportunity to support the delivery of '50 Steps'. Newham's Health and Wellbeing Strategy. The Strategy sets out a commitment to supporting our young people to be healthy and ready for adult life (Priority 2) by enabling schools, youth zones and other young people settings to be health promoting environments. It also looks to improve health and care service provision to all (Priority 3), support schools to be active travel beacons and increase the participation of young people in physical activity and sport (Priority 7). It also seeks to develop of a universal sport and physical activity offer as well as looking to community facilities (parks, libraries, community centres and faith settings) as being hubs of physical activity (Priority 8). We want to use the Local Plan to protect existing and deliver additional community facilities in the right locations, which can help deliver these outcomes.
- Building back fairer in Newham: The COVID-19 pandemic has demonstrated just how crucial our social infrastructure is to our collective resilience and wellbeing. The pandemic has exacerbated existing social and economic inequalities. The impact of the lockdown restrictions, the closure of schools, places of worship and recreational facilities has been coupled with a renewed reliance on our hospitals, parks, mutual aid groups and online advice services. It has often been the most vulnerable in our communities who have depended on these things the most. The COVID-19 Marmot Review calls for a commitment to social justice by putting equity of health and wellbeing at the heart of all policy making. Newham's 'Towards a better Newham – COVID-19 Recovery Strategy' and 'Social Integration Strategy' echo this approach. The pandemic has increased the need for access to and funding of community facilities such as those for early years (including Children's Centres), mental health services (especially for young people who have been hugely impacted) and youth services, such as youth centres (Marmot Review). The COVID-19 pandemic has also resulted in significant changes to how schools operate and manage the safe return of pupils within existing building space; the longer term implications for provision including any impacts on the design of school buildings are as yet unknown, and will need to be taken account of in future plans.

- Addressing loneliness: People who felt most lonely prior to COIVD-19 in the UK now have even higher levels of loneliness. Community facilities offer the opportunity to socialise and build connections. Faith groups, pubs, sport clubs and other community facilities play and important role in creating stronger communities. We want to consider how we protect and promote facilities which can help combat loneliness.
- Social integration: The important role which social infrastructure plays in breaking down the barriers of class, ethnicity and religion that can sometimes separate us is being increasingly recognised. We can better plan for, design and manage social infrastructure to help facilitate social interaction. Co-location of services in new civic hubs is a common model across London. Bringing together unlikely activities in the same space can facilitate social integration between people who may not have otherwise met.
- **Protecting and increasing social value:** Social infrastructure are shared resources within which experiences and social value are created. We want to protect this social value, by better understanding and acknowledging the importance of existing local assets and providing new social infrastructure that address gaps in provision, to ensure existing communities benefit from development.

- Importance of co-design engaging local organisations and community groups in the design and governance of facilities: Co-design is particularly important in areas undergoing significant levels of change. The design of social infrastructure can benefit from the involvement of operators, community groups, residents and workers.
- Spaces and places for children and young people: The GLA's Making London Child-Friendly report stresses the importance of ensuring that young people's needs are taken into account. This is important for helping Newham's' young people reach their potential, particularly in Newham's Year of the Young Person. We need to think about how the built environment impacts on how young people develop and behave. It is important for them to be independently mobile with safe access to play and informal recreation. Spaces away from home and school, such as parks, recreation facilities, libraries and other forms of social infrastructure provide an important space for social interactions to occur.

#### Sources:

- Towards a Better Newham: COVID-19 Recovery Strategy
- Newham Social Integration Strategy
- 2021-Newham Year of the Young Person
- Newham, Places for All, A School Place Planning Strategy 2020 – 2025
- DDCMS: A connected society A strategy for tackling loneliness
- LGA: Loneliness, social isolation and COVID-19
- COVID-19 Marmot Review
- TCPA: 20-Minute Neighbourhoods
- GLA. Good Growth by Design Connective Social Infrastructure

### What evidence will we use?

#### **Community Facilities Needs Assessment**

- An audit of existing facilities and services, informed by an understanding of the demographic make-up and socio-economic data with evidence drawn from the Characterisation Study.
- It will seek to understand better what facilities we have and where, identifying any gaps in provision.

# Sports and Recreation Needs Assessment (led by Newham Sport and Leisure)

- Update to the 2017 Sports and Recreation Needs
   Assessment, to include all types of leisure including
   those not operated by the Council, to identify,
   classify and audit all existing leisure facilities.
- Understand where there is unmet demand both now and in the future, based on the forecasted growth in housing.
- By their nature, sports facilities often form a part of open space. As such, this assessment will have to have regard to the open space needs assessment.
- The assessment should inform a co-produced Leisure Strategy, working with our community and the different users of the leisure spaces in Newham. This will plan strategically for future provision

# Playing Pitch Strategy (led by Newham Sport and Leisure)

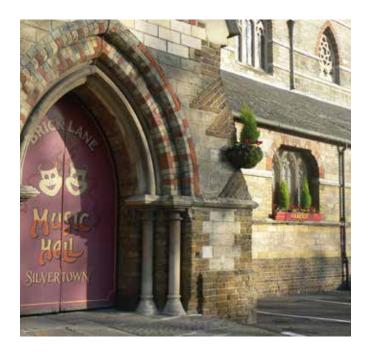
- Update to the 2017 Playing Pitch Strategy.
- Summarise the current supply of playing pitches and outline the demand both now and in the future, based on the forecasted growth in housing.
- To inform where we protect and need to enhance the use of existing playing fields and help plan for where more are needed.

#### **Characterisation Study**

 Working with residents, this piece of work will help to better understand how Newham's neighbourhoods are served by existing social infrastructure.

#### Infrastructure Delivery Plan

- Identifies what infrastructure is required in what locations to support growth and deliver the Plan's objectives.
- It pulls together best-available information from a range of sources including TfL, the NHS, other external bodies and other Council departments.



### **Proposed policy changes:**

- Facilitate 15 minute neighbourhoods: The delivery of community facilities will be an integral part of the delivery of 15 minute neighbourhoods. The Characterisation Study and Community Facilities Needs Assessment will help to identify the range of community facilities that people need in order to live well locally, taking into consideration local preference and movement patterns, as well as wider market trends and service delivery models. To deliver this objective we propose to consider:
  - a. Reviewing the town centre first approach to the location of community facilities.

    Our evidence base will review the location and mix of existing community facilities, how this is aligned with community need and the affordability of space to consider if a different approach is needed. We could amend the policy to provide more flexibility on location. Schemes located outside of a town centre could be permitted where the demand for up-to-date need is demonstrated and detailed sustainable travel plans are provided.
  - b. An alternative approach which would also enable more flexibility on the location of community facilities, would be to **change the definition of town centre uses.** Currently, the Local Plan has an expanded definition of town centre uses to include community facilities. Combined with the policy preference for a town-centre-first approach, this may not lead to the optimum location of facilities to meet local neighbourhood needs. We will explore how this is working in our emerging evidence base and could removing certain uses from this definition.

- Public toilets as a vital community facility.

  Currently, the Local Plan includes public toilets as a defined community facility but our current policy provides no guidance on where they should be located, the hours of operation or accessibility. They are especially important for certain groups of society and the policy could give more emphasis on the need for public toilets, when and how we would expect them to be provided as part of new developments.
- 3. Better reflect the need for community facilities within our neighbourhoods and on specific strategic sites. There is a current lack of detail on the need for certain community facilities at the scale of neighbourhoods and sites. Our policy approach on Newham's Neighbourhoods and Site Allocations could provide better guidance on the types and scale of community infrastructure needed.
- 4. How spaces are managed embedding social value: We could introduce a requirement for new community facilities to meet key defined principles of social value though a management plan or design and access statement. A similar approach to the draft Public London Charter could be applied to the management of community spaces. This could be secured through a legal agreement linked to the planning permission (such as an s106 agreement).

- Create a new policy structure: Our existing policy on community facilities is long and intricate. It is proposed to split it into two separate policies, one on existing community facilities and the other on new and enhanced community facilities. Both will provide greater clarity, in the implementation text, regarding what evidence is required to support applications. In addition, we are considering the introduction of new polices to set out further detail on specific community facilities:
  - a. Education and childcare facilities. A new policy, informed by an evidence of need could provide greater clarity on how we bring forward new educational settings and facilities for childcare. It could set out those sites identified for schools and how and when they will be brought forwardand a requirement for development proposals, for housing and commercial facilities, to ensure that there is suitable child care provision. The policy could specify the locational, design and management parameters we would expect to see in such facilities. For example; sites being accessible by foot, cycling or public transport; entrances and playgrounds being located away from busy roads; seeking traffic calming measures at entrances to benefit from reduced levels of air/noise pollution and road danger; creating settings which embrace nature through the planting trees and plants - encouraging species which provide educational value and those which are edible: accessible and inclusive approach to design and support for extended out of hours use by the surrounding community.
  - b. **Public houses.** A new policy could provide further detail on our approach to the loss of public houses.



### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- How far (considering travel mode and duration) do you usually travel to access community facilities?
- Which community facilities are missing from your neighbourhood?
- What community facilities do you feel are always needed in an ideal 15-minute neighbourhood?
- Would any other community facilities benefit from a standalone policy?
- Should we reconsider the town centre first approach to the location of community facilities?
- Should we have a specific policy approach on public houses and their protection?
- Are there any pubs which are important to you in your neighbourhood?





# WE ARE SHAPING.



OUR ECONOMY.

### Introduction

A key component of achieving sustainable development, is to build a strong, responsive and competitive economy. For Newham, this means building an inclusive and fair economy that is environmentally responsible, secures long term prosperity for residents and includes well-being as a measure of economic success: A Community Wealth Building approach.

Through this approach we seek to enable all residents and businesses to reach their potential and thrive. This is particularly relevant in how the Council wants to respond to the COVID-19 pandemic, economic challenges, including Brexit and to tackle long standing issues that face Newham, including inequality, poverty and financial isolation.

The current Local Plan policies that relate to this topic are:

- J1 Business And Jobs Growth
- J2 Providing For Efficient Use Of Employment Land
- J3 Skills And Access To Employment

# What does our current policy seek to achieve?

#### J1: Business and Jobs Growth

- The provision of a range of different employment facilities with different types of employment uses directed to different locations in the borough.
- Commercial development to maximise economic benefits for Newham and ensure business requirements are met through the submission of an Employment Strategy.

## J2: Providing for Efficient Use of Employment Land

- An efficient use of employment land which provides enough space for existing and new businesses to grow in suitable employment locations, while allowing for the release of some employment land to other uses.
- Successful co-location of employment land and housing can occur by reducing any potential impacts through design.
- Planned industrial land release and intensification of premises.

#### J3: Skills and Access to Employment

- Developers of employment space to commit to providing construction and end user jobs for Newham residents via the Council's job brokerage service.
- Provision of new and expanded childcare and training facilities to help overcome barriers to employment.
- Development of more, and better quality affordable and flexible local workspaces on employment land and/or as part of major mixed use schemes.





## What you've told us

- Young people want to see increased opportunities to test and develop business ideas and more vocational opportunities and strong links with education providers.
- Communities expressed support for more local businesses and start-ups in the area including securing provision for affordable workspaces to support new business expansion.
- Transport improvements were raised as critical in relation to access to employment.
- Innovation with environmental and social sustainability is key for the future in the Royal Docks & Beckton.

- Main council priority should be to secure access for young people to education, work and apprenticeships.
- Recognising the relationship between accelerating housing delivery but also supporting the local economy is key to Newham's future.
- Young people feel they lack spending power with the pandemic limiting opportunities.
- Young people feel there is a limited cultural offer (particularly arts, performance and music) for them.

#### Sources:

- Newham's Housing Delivery Strategy
- Youth Assembly Report 2021
- Royal Docks and OAPF Engagement Report

### What does the data tell us?

- Historic low level incomes with 1 in 3 (33%) residents earning below London Living Wage. Disparities between male and female earnings persist, with female residents earning less than male counterparts.
- In 2020, the employment rate for the working population (aged 16-64) in Newham was 72.7%, which is 2.6% lower than the London average. For the male population this close to the London average, whereby for the female working population the employment rate is 5.8% lower than the London female average.
- Employment rates for ethnic minority groups is 5.5% lower than that for Newham's population as a whole. The number of residents that are economically active are lower than the London and National average.
- In 2016, there were 19,000 children (21%) living in low income families. The number of children living in low income families in 2018-19 was above the London and National average. The borough's high numbers of families living in poverty and low income households persists in 2021.
- Lack of high quality jobs that offer long term security particularly in the knowledge sector, linked to dominance of low income/zero contract roles and opportunities with limited career progression.
- Areas identified in the current Local Plan as having particular economic strengths are continuing to see investment and delivery of employment space.
- Newham is above the London average for young people aged between 16-17 that are not in education, employment or training.

- Since 2016 there have been increases in residents with degree level qualifications (NVQ Level4 +) which corresponds with a decrease in people aged 25-65 with no qualifications.
- Newham is characterised by a high number of small, local businesses. While business start-up levels are high, historically business closure rates (after 5 years) are also high.
- Net gains in approvals and completions for industrial, storage and distribution floorspace are indicative of steady continued demand for industrial uses in Newham on designated industrial sites.
- The only significant office floorspace completion was one major scheme in the Royal Docks. All other office floorspace provision consisted of smaller scale ancillary floorspace supporting the functions of industrial premises.
- The impacts of office to residential Permitted
  Development Rights are reducing year on year, with
  small scale losses to residential taking place outside of
  any designated employment land.
- Despite our policy position, no affordable workspace has been provided as part of any major mixed use schemes.
- Workplace (now Our Newham Work) is an effective mechanism in securing jobs for Newham's residents including young people (16-24).
- Historically across London, industrial land has been release to other uses in excess of the levels set by the London Plan. This has resulted in increasing pressure for industrial land.

#### Sources:

- ONS Earnings Below LLW
- Newham Inclusive Economy Strategy
- ONS Children in Low Income Families
- ONS NEET
- ONS Business Demography
- Newham Info Webpage
- Newham Authority Monitoring Reports, Newham Our Newham Work (formerly Workplace) 2018-19 monitoring data
- London Industrial Land Demand Study

# What are we required to consider and plan for?

#### National Planning Policy Framework (2021)

- Local Plans should be informed by a detailed understanding of existing and future business needs over the plan period. This includes identifying a sufficient supply of land to support different employment uses.
- Policies should set a clear economic vision and strategy which positively encourages sustainable economic growth.

# The Use Class Order and Permitted Development Rights (amended 2020)

- The changes outlined in the High Streets section also impact on the delivery and protection of community facilities.
- New Permitted Development Rights allow for the conversion from both offices and light industrial premises to residential and other uses, such as nurseries and shops, without planning permission.
- We will need to consider how this impacts on protecting and delivering sufficient employment land to meet demand in a range of sectors.

#### London Plan (2021)

 Local Plan policies should plan for a diverse range of business spaces. This includes supporting needs for micro, small and medium-sized enterprises, including those wishing to start-up, expand or occupy lower cost premises.

- Local Plan policies should support affordable
  workspace by directing this workspace to either site
  specific locations or areas of need. This includes space
  that would be suitable as part of a mix of business or
  cultural uses. This should be drawn up in the light of
  local evidence demonstrating need and consideration
  in relation to provision and the impacts on overall
  scheme viability.
- Boroughs should provide sufficient supply of land and premises to meet for industrial and related functions (including logistics and warehousing), including through the potential for industrial Intensification, Co-Location and Substitution.

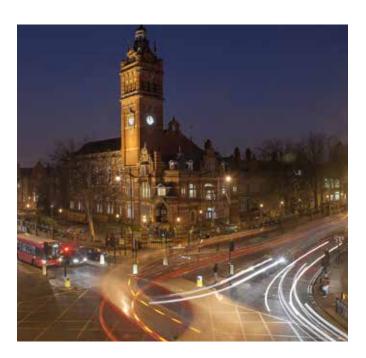
#### Relevant London Plan chapters and policies:

- Objective GGI Building Strong and Inclusive Communities
- Objective GG5 Growing a Good Economy
- Policy D3 Optimising Site Capacity through the Design-Led Approach
- Policy D13 Agent of Change
- Policy HC6 Supporting the Night-Time
- SI6 Digital Connectivity Infrastructure
- Chapter 6 Economy

# What new trends and objectives do we want to address?

- Health and Wealth: As part of the Council's approach to post COVID-19 recovery and reorientation, we are focusing on the integral relationship between employment and health, recognising that creating an inclusive economy can have health benefits that reduce distress, unhealthy behaviours and financial insecurity. Community wealth building aims to tackle poverty and address health inequalities that are related to economic inequalities such as unemployment, economic inactivity and poor working conditions. We want to consider how we can build an economy which delivers health benefits for Newham residents.
- Creating an inclusive and diverse economy:

Newham's economy is characteristically enterprising, with a diverse range of businesses and workspaces. Key to delivering our community wealth building and inclusive economy agendas will be to maintain and enhance this: enabling businesses to stay and grow in Newham, as well as encouraging new businesses to start-up. Our commitment and approach to this, including through a business pledge, is outlined in our COVID-19 Recovery and Reorientation Strategy. We also need to consider how to enable more equitable access to a diverse range of employment spaces – both in terms of affordability, location and connectivity.



- · Secure high quality and better paid jobs, including work in the new economy: Integral to community wealth building is ensuring residents are supported to access to work and other opportunities. This is articulated in the Community Wealth Building business pledges which encourage local businesses to help build a strong and resilient local economy though economic, social and environmentally responsible working practices. The planning system can also help secure these objectives. This includes helping to equip residents, particularly young people, with skills and knowledge to flourish and secure their economic futures, by requiring commercial developments to contribute towards training and employment opportunities. Planning policy also has a role in supporting residents achieve greater economic resilience through the creation of a higher wage economy and improved working conditions, through prioritising the development of growth sectors such as green enterprises, cultural, knowledge intensive and high tech/digital companies.
- Newham to become the greenest economy: As part of Newham's Recovery and Reorientation Strategy (pillar 6), the Council has committed to building a green economy. This coincides with a growing market understanding of the role that businesses have in tackling the climate emergency and value of a growing green economy. We want to explore how planning can support the promotion of job opportunities and skill development (particularly for young people) in green jobs; encourage businesses in the borough to be more environmentally responsible though investment in their premises; and supporting business who provide climate improving products and services with green credentials to set up in Newham. This will build on the work undertaken in the Royal Docks as an incubator for innovation and green tech.
- Changes to working patterns: The way people work is changing towards patterns that are more agile. The longer term trends of working patterns postpandemic are yet to be fully established. However the impact will affect the way we live and work and have implications on the need for office space. More residents may not always work in centralised offices but may wish to explore somewhere to work outside of, but close to, their home such as their closest town or local centre or areas with identified employment clusters. Some employment designations and town centres have the potential to create new spaces to offer flexible and more local remote/co-working environments which encourage integration, local spend in Newham and reduce the need to travel further afield for work. This emerging trend feeds into the ambitions of delivering '15 minute neighbourhoods' that provide access to economic, social and civic essentials. This could include access to employment space. Viewing employment space as a key component of 15 minute neighbourhoods means we should no longer view our employment locations - the majority of which are at the fringes of the borough – as separated from the rest of the borough and could provide further opportunities for local employment. This should in turn encourage opportunities to support co-location and mixed use across the borough.

• Data-driven economy: The data and digital sector is fast growing, and as Newham's economy grows, we want to ensure data and digital innovation and inclusion are at the forefront of this. This sector has been explored in areas such as the Royal Docks as a testbed for innovation and enterprise and will continue to grow as part of sustainable growth in Newham. We want to take this opportunity to explore the role of data and digital infrastructure to support an inclusive economy for Newham. Growth in the digital economy is also about the jobs it creates, particularly for young people and securing long-term future-facing economic opportunities for residents.

#### Sources:

- Newham 'Towards a Better Newham' Covid-19 Recovery Strategy
- Newham Inclusive Economy Strategy
- Health and Wellbeing Strategy Part 2: The Evidence for Action
- Newham Climate Emergency Action Plan
- The Economic Future of Central Activity Zone: Phase 1 Office Use Trends
- Newham Support for Business Pledges



### What evidence will we use?

#### **Employment Land Review Update**

- This evidence assesses the forecasted need for employment floorspace across the plan period and analyses the supply of employment land available to demonstrate we can meet that economic need. It will incorporate:
- Land Audit An audit of the borough's employment land, identifying their appropriateness for continued employment use (including opportunities for intensification and co-location) and land options to support wider objectives of the Plan.
- Supply/Demand Study A review of the economic context for Newham, identifying growth sectors and providing an assessment of whether there is sufficient land to meet need.

## Spaces for Enterprise Strategy (led-by LBN Regeneration)

- Spaces for Enterprise is a Council-asset driven programme which aims to improve the provision of affordable workspace, and tackle barriers to employment and enterprise.
- The study largely focuses on existing Council assets identifying demand across the borough, but provides recommendations and opportunities to deliver new workspace in the long term.
- The draft strategy identifies that planning policy could be developed to become more prescriptive on affordable workspace to better secure and bring forward this workspace

### **Proposed policy changes:**

- Identify sufficient employment land in the right locations to support growth sectors. The new Local Plan will continue to support growth sectors and safeguard sufficient land for economic growth and allow any surplus land to be considered for other uses such as housing. However, where that land is safeguarded and for which uses will be informed by updated evidence on growth sectors and which uses continue to support sustainable economic growth across Newham as well as market requirements. This will mean we can direct employment uses to areas that meet business needs across the borough and deliver a better quality and a diverse range of workspaces within these locations. The update will ensure we maximise economic opportunities on employment land and areas of growth, meet forecasted demands and deliver this in line with wider Council objectives.
- Including employment space as an important contributors to inclusive, 15 minute neighbourhoods. Options to deliver this, include:
  - a. Reflecting 15 minute neighbourhood principles in the locations of employment land designations and other areas where employment uses may be directed, such as town centres.
  - b. Exploring opportunities to increase the provision of flexible or co-working workspaces in locations which responds to trends in more agile working and increases in people choosing to work more remotely either from home or locally. As such, policy development may direct flexible and co-working space towards town centres.

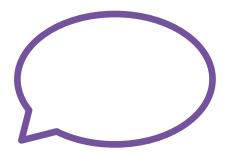
- c. Requiring proposals on employment land to demonstrate how they support inclusive neighbourhoods through improving residents' access to secure employment opportunities, such as through training and job opportunity, links to local communities and/or improved connectivity to neighbouring residential areas. This may form part of requirements in the Employment Strategy.
- Explore ways to ensure new commercial development secures a fair deal and good growth for Newham. Our current Local Plan policy requires major development proposals for employment uses to demonstrate they create better economic outcomes for Newham residents through commitments to local jobs, skills and training in an Employment Strategy. We want to update this to require major proposals to demonstrate how they deliver our Community Wealth Building Objectives. This will include a commitments to fair employment and good quality job creation locally that is environmentally and socially responsible which build on our emerging Business Pledges. This will include encouraging businesses to prioritise sustainability and local opportunities, including those for young people as well becoming a fair employer through high quality working conditions with reference to the Mayor of London's Good Work Standard and improving pay conditions. It will also request applicants to demonstrate how the Council's brokerage Our Newham Work can support this.
- 4. Become more prescriptive on affordable workspace provision: We want to explore the best ways to support local businesses to grow and new businesses to start up through the provision of affordable workspace in the right locations.

- Our current policy directs affordable workspace to certain locations but none has been delivered to date, so we want to consider a revised policy approach. This may include requiring a percentage of new floorspace created within major mixed-use schemes and on employment land to be provided as affordable workspace. We will consider focusing on certain locations, the creation of cluster workspaces and enabling operation by recognised workspace providers to ensure such provision meets an identified need. Where affordable workspace is not appropriate, the use of financial contributions to provide workspace in other locations could be considered. Evidence around the scale of need and confirmation around affordability (rent levels) in different parts of the borough will be developed to progress any policy requirements and would be subject to viability testing.
- Incentivising a greener economy: We want to consider a range of ideas to encourage green businesses to operate in Newham. One proposal is for the creation of 'green zones' in which economic uses would be required to deliver the highest environmental standards in the design and build of their workspace; create environmentally products or services outputs and/or provide training in green jobs and skills to support sustainable economic growth.
- 6. Supporting a data driven and digital economy. We will identify the demand for digital infrastructure in different locations in the borough, as a driver of growth and a modern economy. We will consider ways to support the provision of such infrastructure where they also create local and good quality jobs and contribute towards inclusive neighbourhoods.



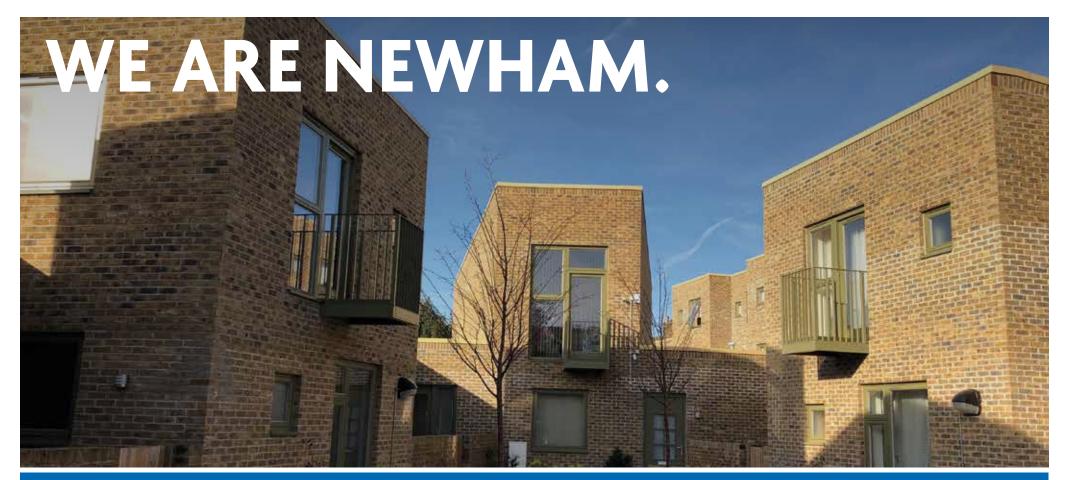
### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- What else can we do to support a greener and more inclusive economy?
- What could we do to better protect and support local businesses' and allow them to thrive and expand?
- How can we maximise the supply and delivery of affordable workspace in the borough?
- How can economic policies better support changing working patterns such as working from home and/or remote working locally?





# WE ARE SHAPING.



OUR HOMES.

### Introduction

The delivery of genuinely high-quality, affordable homes is critical, helping our residents to live healthy and happy lives. The COVID-19 pandemic has reemphasised the connection between the quality of our homes and our physical and mental health. If our housing is good quality, we are more likely to make connections and thrive in our neighbourhood. Housing also has an important role to play in addressing the climate emergency, ensuring our homes are energy efficient, that we achieve carbon reduction targets and reduce the environmental impacts of construction. We need to ensure that recovery from the pandemic leads to better housing outcomes for all of our residents. This means not only delivering a sufficient number of new homes to meet our housing targets, but also providing housing that meets the needs of all our residents. The housing policies of the Local Plan will be fundamental to securing this future.

The current Local Plan policies that relate to this topic are:

- H1: Building Sustainable Mixed Communities
- H2: Affordable Housing
- H3: Specialist Accommodation Needs
- H4: Protecting and Re-Shaping the Existing Housing Stock

# What does our current policy seek to achieve?

#### H1: Building Sustainable Mixed Communities

- Delivery of at least 43,000 new homes between 2018 and 2033.
- Well-designed and high quality homes and neighbourhoods, with access to supporting infrastructure and community facilities.
- A mix and balance of housing types, including requiring 39% of new dwellings to be 3 bedroom homes on sites capable of delivering 10 or more units and 10% of new build homes being delivered as wheelchair user dwellings.
- Delivery of housing on sites which aren't otherwise protected for other uses.

#### H2: Affordable Housing

- Overarching strategic target for 50% of new homes delivered between 2018 and 2033 to be affordable units, ensuring affordability is not delivered at the expense of quality or housing mix.
- Individual sites, with the capacity for 10 or more units, to deliver between 35-50% affordable housing, with a tenure split of 60% social housing and 40% intermediate homes (a ratio of 50:50 is sought in the Canning Town and Custom House Regeneration Area).

#### **H3: Specialist Housing**

- Delivery of homes to meet the local and strategic needs of all households, ensuring specialist forms of accommodation are provided in suitable locations and, where appropriate, aligned with local needs.
- Protection for older people's housing and other specialist accommodation for vulnerable people (falling under use class C2).
- Proportionate delivery of purpose-built student accommodation so it does not undermine the delivery of conventional housing.

# H4: Protecting and Re-shaping the Existing Housing Stock

- Protects all forms of housing unless replaced by equivalent floorspace.
- Specifically protects family-sized properties (3 or more beds).
- Supports the de-conversion of flats and Houses of Multiple Occupation (HMOs) back into family dwellings.



### What you've told us

- Cost of living, housing affordability and high private sector rents remain significant concerns for our residents.
- We need to build more affordable and high quality housing, especially social rented homes, and ensure that new homes are supported by required infrastructure (for example, schools and GP surgeries).
- Young people are worried about the cost and insecurity of housing. Increasing the amount of affordable housing is one of young people's priorities for Newham.

- Considerable support has been shown for improving social integration and fostering relationships within the community, helping people to get to know their neighbours.
- There is a need to keep the history and culture of the borough alive, avoiding poor quality, 'faceless' housing developments.
- We need to clarify how we will support vulnerable young people, adults with mental health issues, people with disabilities, people who have experienced domestic violence and abuse and people with no recourse to public funds into housing.
- We need to ensure that temporary accommodation is of a high standard and that people living in temporary accommodation are receiving appropriate support.
- Residents want to be involved in housing decisions, both through engagement and being part of the solution to issues.
- Collaboration with the voluntary sector, community groups and unions on housing issues is welcomed.
- We need to ensure our objectives for housing delivery support and reflect other Council priorities and strategies, including the Borough's COVID-19 Re-orientation and Recovery Strategy, our Health and Wellbeing Strategy and supporting the local economy.

#### Sources:

- Newham's Housing Delivery Strategy Consultation Report
- We Make Newham: Youth Assembly Event Findings Report 2021
- Community Assemblies
- Royal Docks and OAPF: Engagement Report
- Newham Survey 2018 and 2019



### What does the data tell us?

- Newham has a young population compared with the rest of the country, with the average median age being 32.7 years old. This means demand for housing will continue to increase in future years. A resident's age can sometimes affect their housing choice, particularly young people, in receipt of housing benefit, who are subject to the single accommodation rate.
- The borough does not have sufficient capacity in our pipeline of approved housing schemes to meet our housing target for the next five years.
- Completions of new housing have fallen behind our annual housing targets but permission rates remain high. The reasons for this gap include low market 'absorption rates' (the rate developers will release homes onto the market to prevent price falls), high costs of infrastructure and remediation, complex land ownerships and viability constraints.
- Delivery of affordable housing has fallen below our adopted strategic target. However, approval rates of affordable homes are improved and should translate into increased completion rates in future years.
- Delivery of family-sized homes has not kept pace with approval rates. However, existing policy protections for existing housing stock and family-sized homes have proved effective, being upheld through multiple appeal decisions.
- House prices have risen significantly in the borough, with the average median house price in Newham being £415,000 as of December 2020.

- Newham has a high proportion of households renting in the private sector (around 60,000), with average rents having increased by 40% between 2014 and 2019. In 2017 those from white, non-British ethnic backgrounds were most likely to rent their accommodation from a private landlord, with 75% of these ethnic groups living in the private sector. The next most likely to rent privately were those from Asian Indian backgrounds, one third of whom live in privately rented accommodation.
- Welfare reforms by the Government have affected some residents' access to housing. In 2018/19 Newham had the highest number of households in temporary accommodation and the second highest Local Authority waiting list for affordable housing in the country. This situation may be exacerbated in future years by the impacts of the COVID-19 pandemic.
- Overcrowding also continues to be a significant issue in Newham, with proposed amendments to our Housing Allocations Policy seeking to address this. The 2011 Census data showed that Bangladeshi and Black African residents in particular were more likely to be found in overcrowded households, and were more likely to be living in housing in a poor condition, or otherwise be more unsuitably housed than the white British population.
- Newham also has the highest rate of family homelessness in London, with this impacting children's start in life through increased risks to their physical and mental health. Data from Public Health England shows that Newham has the highest number of children living in poverty in London.

- Research has shown that people with a disability
  face barriers in accessing suitable housing. In 2017,
  research of Newham Survey responses found that
  residents with a disability were twice as likely to live in
  households in poverty before housing costs. Waiting
  times for wheelchair adapted homes in Newham
  remain high, particularly for larger family homes (four
  and five beds).
- Specialist housing remains a small proportion of the borough's housing delivery, reflective of the fact that most housing need remains in the conventional sector. However, a significant number of student bedrooms are currently being delivered in the London Legacy Development Corporation area.

#### Sources:

- mid-2020 ONS MYE
- Newham Homelessness and Rough Sleeping Strategy
- Newham Housing Delivery Strategy
- VOA Average Private Rents, Borough
- The Census 2011
- Understanding Newham 2017: Findings from Wave
   9 of the Newham Household Panel Survey
- Building for Equality: Disability and the Built Environment
- ONS, Median house prices for administrative geographies
- Newham Recorder, Borough has the highest number of children living in poverty, study shows
- Newham 5 Year Land Supply Update
- Planning applications data 2019
- GOV.UK Statutory homelessness in England
- LAHS
- Newham Occupational Therapist Data (2018)
- Well Newham: 50 Steps to a Healthier Borough -The Evidence for Action



# What are we required to consider and plan for?

#### National Planning Policy Framework (2021)

- Boroughs should establish a housing target and prepare a housing needs assessment to identify need for different types and tenures of homes. The size, type and tenure of housing for different groups in the community should be reflected in planning policies.
- Boroughs should prepare a strategic housing land availability assessment to understand land availability in the area. Plan policies should identify a supply of sites and locations of growth over the Plan period. At least 10% of the Borough's housing requirement should be on sites no larger than one hectare.
- Policies should specify on-site targets for the delivery of affordable housing where a need is identified. In most cases at least 10% of a major development's housing offer should be available for affordable home ownership.

#### The London Plan (2021)

- Sets a target for Newham to deliver 32,800 new homes between 2019/20 and 2028/29, of which 3,800 homes should be on small sites (below 0.25ha).
- Strategic target for 50% of new homes delivered across London to be genuinely affordable, with a minimum affordable housing tenure split of 30% low-cost rented homes (London Affordable Rent or Social Rent) and 30% intermediate products (London Living Rent and Shared ownership), with the remaining 40% determined by boroughs based on their identified housing needs. The policy sets an expectation that affordable homes should be delivered on site and implements a threshold approach to affordable housing, with review mechanisms for schemes delivering less than policy compliant levels.
- Schemes should consist of a range of unit sizes, with appropriate mix being determined through a range of factors including robust evidence of local need.
- Housing floorspace should be protected or reprovided. Existing affordable housing floorspace should be retained or replaced by housing of an equivalent tenure.
- Developments and site allocations should follow
   a 'design-led' approach to optimising site capacity,
   responding to individual site contexts. Boroughs
   should seek to deliver high density in well-connected
   areas supported by required infrastructure. Further
   guidance is provided in the Good Quality Homes for
   all Londoners London Plan Guidance.

- At least 10% of dwellings should meet Building Regulation requirement M4(3) (wheelchair user dwellings). All other dwellings should meet Building Regulation requirement M4(2) (accessible and adaptable dwellings).
- The housing chapter sets out policy expectations with regards to a range of housing typologies and tenures, including:
  - Build to rent
  - Supported and specialised accommodation
  - Specialist older persons housing (Policy H12 sets a benchmark for delivery of 85 specialist older people's homes per annum in Newham between 2017 and 2029)
- Gypsy and Traveller accommodation
- Purpose-built student accommodation
- Large-scale purpose-built shared living

#### Relevant London Plan chapters and policies:

- Chapter 4 Housing
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing

# What new trends and objectives do we want to address?

- Over the course of the pandemic there has been a fall in London's population, accompanied by a reduction in rental prices, particularly in inner London. We will continue to monitor the longer-term impacts the of COVID-19 pandemic and Brexit on London's population and housing market.
- There is a pressing need to address housing inequalities in the borough, recognising that nearly 50% of our residents live in poverty when housing costs are taken into account. A significant amount of additional housing needs to be delivered in the borough at a price and level of quality that can enhance the lives of residents and ensure they can settle and put roots down in Newham. Delivering high quality housing will form a key foundation of Newham's recovery from the pandemic.
- A number of new affordable housing products have been introduced, including London Affordable Rent and London Living Rent. The Government has also announced its intention to introduce a new discounted affordable home ownership product, First Homes. It will be important to explore the affordability of these new tenures for our residents as part of the Local Plan evidence base.

- The housing sector has been impacted by the COVID-19 pandemic and wider economic instability. Recognising that affordable homes are a stable asset, given high levels of need across London, delivering more affordable homes can help with the housing sector's recovery from the COVID-19 pandemic.
- The stability and quality of our housing can have a significant impact on our physical and mental health. Housing needs to be well-designed, safe and adaptable to our changing needs. This may include increased space for homeworking and study, good quality kitchens, provision of private gardens, ensuring our homes are warm and energy efficient and are well-located in terms of access to facilities and open space.
- We want to place greater emphasis on the contribution housing can make in addressing the climate emergency, in particular through improvements to thermal and energy efficiency and through design choices (for example, dual aspect design).
- A 29% rise in London's older population is expected across the next decade. More adaptable housing and more tailored specialist provision will likely be required to provide greater housing options for older people.
- Homelessness has reduced slightly in the London as a result of the emergency measures put in place by the Government in response to the COVID-19 pandemic. However, long-term trends in homelessness and the economic repercussions of the pandemic, which may lead to an increase in homelessness, mean that we

need to tackle issues of homeless and rough sleeping in the borough, ensuring homeless households are provided with housing options suitable to their needs and accompanied by appropriate support.

#### Sources on data trends:

- GLA Housing and Land, Quarterly Housing Market Report
- Financial Times, What London's falling population means for the housing market
- The RIBA Journal, Rethink: How Covid is rearranging the design of homes
- Newham Draft Homelessness and Rough Sleeping Strategy
- Centre for London, Third Age City: Housing for Older Londoners
- GLA, London's COVID-19 Housing Delivery Recovery Plan
- Newham Climate Emergency Action Plan
- Newham Well Newham 50 Steps to a Healthier Borough - The Evidence for Action
- Newham Towards a Better Newham COVID-19
   Recovery Strategy
- Newham Community Wealth Building



### What evidence will we use?

## Strategic Housing Market Assessment / Housing Needs Assessment

- The study will provide an assessment of housing need across the borough, helping us to plan for a mix of housing based on evidenced demographic and market trends as well as the needs of different groups in the community.
- It will help us to set affordable housing policies, informed by an up-to-date picture of our housing needs.

#### **Call for Sites**

• The Call for Sites exercise will provide an opportunity for members of the public, businesses, landowners and developers to identify sites we may not know about and where there is an intention to undertake development in the future. The exercise will also give an indication of when these sites may be made available for development, which will feed into the Characterisation Study and housing trajectory.

#### The Characterisation Study

 The Characterisation Study will identify the housing capacity of strategic sites and areas suitable for intensification, building on the design-led approach to optimising site capacity set out within the Good Quality Homes for all Londoners London Plan Guidance.

### **Proposed policy changes:**

- 1. We need to balance Newham's strategic importance in delivering London's housing target with providing homes that meet local needs within the borough. We anticipate that Newham's housing need, identified through our updated Strategic Housing Market Assessment and Housing Needs Assessment evidence, will be less than our London Plan housing target. Therefore, we will need to update our policies to balance national and regional requirements with local housing need and viability. This may result in changes to our existing size and tenure mix requirements. These changes will be led by our evidence base.
- 2. We need to maximise the delivery of genuinely affordable homes that meet the needs of Newham's residents. We anticipate that our evidence base will identify a significant need for social rented housing. We also want to explore the need for other affordable housing products, as well as explore the feasibility of introducing a more targeted approach to viability review mechanisms and affordable housing requirements on minor schemes (below 10 units). Changes to affordable housing policy will need to be tested through evidence, as we need to make sure any amendments are viable and deliverable across the plan period.
- Balancing the need to protect family homes with meeting specialist housing needs, particularly of vulnerable groups. Our adopted housing policies place emphasis on protecting family housing. This position has been beneficial in helping us to meet the considerable need for family-sized homes in the borough. However, we recognise that this approach can reduce housing options for rough sleepers, homeless people, people leaving care and single people. We also recognise that larger affordable homes may be needed to address issues of overcrowding. We will explore options for how the needs of those residents will be met while making sure we continue to protect and deliver family homes. Evidence around housing need and viability will inform any updates to our adopted family housing policy.
- 4 We will consider whether a renewed approach is needed in assessing applications for supported and specialist accommodation. Specifically, we may move from one policy covering all types of specialist accommodation to specific policies for different types of housing to allow for more focused policies. Critically, any updates to our approach will need to ensure that accommodation is of a high quality, meets identified needs (including affordability where relevant) and is suitably located for its occupants. Exploring how and where best to meet the accommodation needs of different groups will be informed through the Strategic Housing Market Assessment and Housing Needs Assessment evidence base, as well as best practice and feedback from residents living in specialist accommodation.

- We wish to explore how we can achieve best practice in the design of new housing, making sure new homes contribute positively to our residents' physical and mental wellbeing. Homes delivered will need to be well-located, safe and designed to meet the varied needs of Newham's diverse population and be adaptable to people's changing circumstances over time.
- 6. Responding to the climate emergency needs to be further embedded in our approach to housing delivery. We want to ensure that housing developments are energy efficient, reduce fuel poverty and contribute even further towards carbon reduction targets. However, we need to balance the cost of these requirements (for example net zero or Passivhaus) with other policy requirements for affordable housing and infrastructure. This policy may be contained within the sustainability section of the Local Plan.



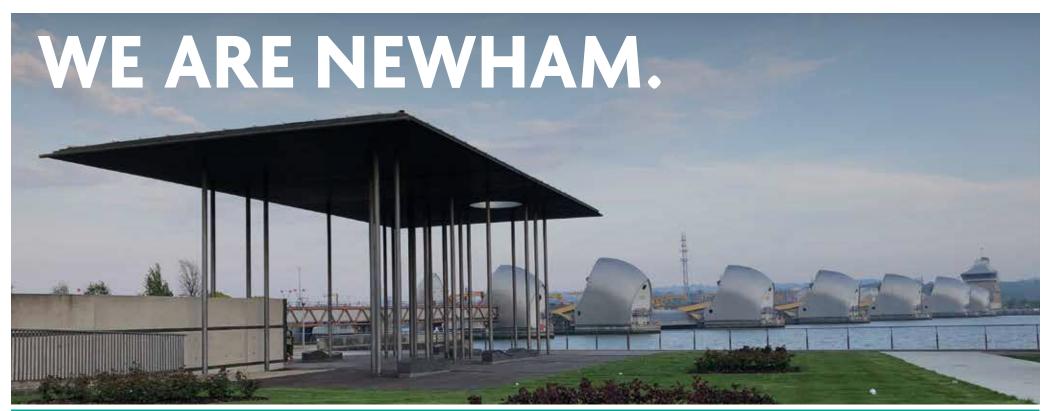
#### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- What do you think the main priority for housing delivery should be? (for example, affordability, size or types of accommodation, addressing the climate emergency etc.)
- What could improve the quality of housing provision within the borough? (for example, adaptable layouts, accessibility, proximity to shops and services etc.)
- Is there anything else we should be aware of when developing more tailored policies for different types of supported and specialist accommodation? (for example, around design or need for particular accommodation types)





# WE ARE SHAPING.



# OUR GREENSPACES AND WATER SPACES.

#### Introduction

Newham has a network of natural and open spaces; not just our nature reserves, parks, and rivers but also playgrounds, playing fields, allotments, gardens, hedges, green walls, green/brown roofs, cycle and footpaths, street trees, docks, lakes and ponds. These are referred to as the borough's 'Green and Blue Spaces', 'Blue Ribbon Network' and 'Green Infrastructure' (GI).

Well-connected and well-designed local green and blue spaces deliver multifunctional benefits – from environmental benefits (reduced flood risk, increased wildlife, reduced urban temperatures) to social and cultural benefits (improvements in mental and physical health and social interaction and integration) to economic benefits (encouraging people to spend time and money in beautiful spaces).

This topic also addresses biodiverse places. Having a biodiverse borough means having a rich mix of plants and animals; and this variety and complexity helps nature to thrive.

The connectivity of natural spaces is important – not only because a network of open space means that wildlife can flourish but because providing easy access to such spaces also allows people to enjoy nature for recreation and education, as well its beauty.

The current Local Plan policies that relate to this topic are:

- SC4: Biodiversity
- INF6: Green Infrastructure and the Blue Ribbon Network
- INF7: Open Space and Outdoor Recreation

# What does our current policy seek to achieve?

#### **SC4**: Biodiversity

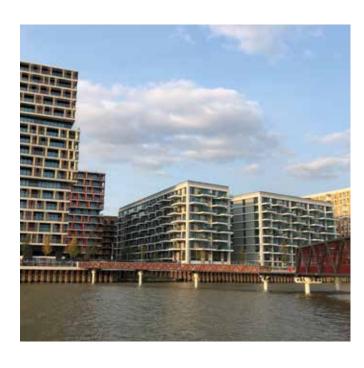
- Protect and enhance biodiversity on land and in water environments.
- Deliver Biodiversity Net Gain. This means that a new development must ensure that its habitat for wildlife is enhanced and left in a measurably better state than it is was before
- Improve access to nature.
- Protect habitat connectivity and trees.

### INF6: Green Infrastructure and the Blue Ribbon Network

- Protect, enhance and improve the connectivity of Green Infrastructure (and the Blue Ribbon Network.
- Support residential and visitor moorings.
- No net loss of functionality of green and blue spaces.
   This means planning decisions about a green or blue space need to be thought about not only in terms of the impact to the amount of this space (more or less) but also in terms of the impact to how it functions for wildlife and the people who use it. A space could have a key function for nature, it could be a place where people can exercise or, very often, it will perform a mixture of different functions.
- Deliver the Lea Valley Regional Park.

#### **INF7: Open Space and Outdoor Recreation**

- Protect existing green and blue space; seeking improvements to the quantity, quality, accessibility and connectivity.
- Deliver the Lea River Park and Thames Path.
- Reduce park, allotment and playing pitch deficiencies.
- Design open space to enhance urban cooling, biodiversity and to help against flooding. In addition spaces should be welcoming, inclusive and provide publically accessible toilets.
- Require sustainable ongoing management and maintenance plans.
- Play space should meet the latest London Plan requirements.
- Epping Forest Special Area Conservation (SAC)
  requirements. This requires schemes in proximity to
  the Forest to mitigate the impact of increased visitor
  number on the Forest through a Habitat Regulation
  Assessment and in some cases payment.



### What you've told us

- The majority of people think that our parks are good (82%).
- The 2021 Citizens' Assembly is exploring how can we work together to make our parks and green spaces even better for residents and visitors. The community has identified seven priorities it would like to address:
- Safety and crime in green spaces.
- The Council to work collaboratively with the community to fund and improve green spaces.
- Activities and events which are inclusive and accessible.
- Protect, maintain and increase well-designed green spaces.
- Rewilding improving biodiversity by creating more wild-grown areas.
- Green spaces we are proud of investment in maintenance and tackling litter.
- Welcoming and comfortable places which make the best use of space.
- Young people in the borough have highlighted similar issues and want to see an increase in wildlife, to improve biodiversity and access to nature.
- Young people also want their needs for open space listened to, which include safer, well-lit, freely accessible public spaces; to feel welcome young people feel excluded due to gentrification; spaces they can identify with and allow them to spend time together free of charge with seating, lighting, shelter, activities, free Wi-Fi and a sense of security; and youth friendly signage.

 People living and working in the Royal Docks would like: places to feel safe (animation of the public realm and water fronts); community and social spaces and cafes for all ages in green spaces; open and water spaces to be better maintained and used; activities on the water and spaces which celebrate the industrial and natural heritage.

- Newham Survey 2018 and 2019
- Youth Assembly Report (2021)
- Community Assemblies 2019 and 2021
- Royal Docks and OAPF: Engagement Report (2019)

#### What does the data tell us?

- In 2019 London became the world's first 'National Park City'.
- Green space covers 13.1% of Newham, compared with 39% for London as a whole.
- Newham has 25 parks and numerous green spaces totalling approximately 396 ha of publically accessible green space.
- The borough has 16% tree cover which is the second lowest in London.
- People enjoy and use parks and open spaces in Newham, with 43% of residents visiting at least once a week.
- Newham has seen no reduction in Sites of Importance for Nature Conservation (SINCs) since 2006/07, when 0.37 ha were lost.
- Newham has the largest three largest rivers in London, with the Thames to the south within the Royal Docks area, River Lea in the west and to the east the River Roding.
- The Environment Agency (EA) monitors the biological river quality as part of the Water Framework Directive. Of the three rivers in Newham, the Lea is noted to have the worst overall water quality, with the EA 2019 assessment rating it 'Bad'. The Thames and the Roding are both rated 'Moderate', however neither river has improved its overall rating in the last 6 years.

- Research provides compelling, measurable evidence
  of the immense social, environmental and economic
  benefits that well-designed and integrated green
  infrastructure can have on community vitality, climate
  change mitigation, resource efficiency and desirability,
  property prices, longevity and health of a city.
- Greening (planting of trees) has a cooling effect on the environment, with an urban park being approximately IoC cooler than a non-green site.
- Access to, and engagement with, the natural environment is associated with numerous positive health outcomes, regardless of social class, including improved physical and mental health, and reduced risk of cardiovascular disease, risk of mortality and other chronic conditions.
- Improving the appearance of a park can increase usage and improve physical activity among children and older adults, which in turn can reduce risk of obesity.
- There is extensive cemetery provision in Newham, with a range of providers. The borough has 120.7 ha of burial space. However we know that for some communities there are a shortage of suitable burial sites.

- London Development Database
- Well Newham 50 Steps to a Healthier Borough.
   Part 2: The Evidence for Action
- Public Health England: Spatial Planning for Health. An evidence resource for planning and designing healthier places
- RTPI Mental Health and Town Planning
- GLA: An Audit of London's Burial Provision
- Arup: Cities Alive: Rethinking green infrastructure

# What are we required to consider and plan for?

#### **National Planning Policy Framework 2021**

- Environment is one of the three overarching objectives which need to be balanced in order to deliver sustainable development.
- Local Plans should:
- Conserve and enhance the natural local environment.
- Recognise the wider benefits from natural capital and ecosystem services.
- Minimise impacts on and provide net gains for biodiversity.
- Plan positively for shared open space for recreation, sport and physical activity.
- Plan for access to safe and accessible green infrastructure.
- Identify, map and safeguard local wildlife-rich habitats.
- Take a proactive approach to mitigating and adapting to climate change.
- Policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and the opportunities for new provision.
- Existing open space, sports and recreational buildings and land should not be built on unless informed by an assessment which shows it is no longer needed.
- New focus on delivering tree lined streets

 Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

#### **London Plan 2021**

- Boroughs should prepare a Green Infrastructure
   Strategy and evidence to inform area-based strategies
   which identify green infrastructure assets, their
   function and potential function.
- Develop a borough specific Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required by major developments.
   The London plan includes a London-wide UGF to encourage more and better urban greening. It assists boroughs and developers in deciding the right type of urban greening for a development.
- Local Plans should protect and enhance waterway infrastructure. Proposals should support river restoration and biodiversity improvements.
- Provision should be made for the different burial requirements of London's communities, informed by a needs assessment.

### Relevant London Plan Chapters and Policies:

- Chapter 8: Green Infrastructure and Natural Environment
- SI 14 Waterways Strategic role
- SI 16 Waterways use and enjoyment
- SI 17 Protecting and enhancing London's Waterways
- Policy S7: Burial Space

#### **London Environment Strategy 2018**

 Maximise green infrastructure in order to support the aim of more than half of London being green and for canopy cover to be increased by 10 percent.

# What new trends and objectives do we want to address?

- Green and blue space for health: Pillar 1 of Newham's COVID-19 Recovery Strategy sets out that in Newham, our measure of success will be the health, happiness and wellbeing of our resident's, rather than growth, productivity and land value. A growing body of research, and our lived experience through the COVID-19 pandemic, has demonstrated that access to nature and open space for fresh air, exercise and a quiet escape improves our physical and mental health and wellbeing. Good quality open space enhances our quality of life and makes Newham more attractive and safer.
- Parks and green space for all: During the COVID-19 pandemic many people have become more aware of the nature on their doorstep and more dependent on it for recreation, exercise, and social contact. However, the benefits of spending time in nature are not distributed equitably, with many losing out because of a lack of suitable, good-quality local provision or more complex societal barriers. For those without gardens, the pandemic has highlighted the inequality of access to open space, amplifying the value of shared public spaces. Research tells us that access to green space is a social justice issue. With barriers experienced due to religion, race, ethnicity, age, disability, and gender and LGBTQI+ identity all impacting on access to and enjoyment of public space.

- Invest in green space for climate change: As an urban borough, Newham's network of natural spaces act as a green lung; protecting biodiversity by giving much needed homes for wildlife (animals and flowers), reducing pollution, helping water management, moderating urban temperatures and providing a buffer against the climate and ecological emergency.
- Re-naturing (or Re-wilding): The concept of renaturing seeks to create healthier, more socially cohesive, biodiverse and connected city ecosystems for people and wildlife. It is about letting nature take care of itself and restoring an ecosystem's functionality rather than about creating wilderness. It is about working with nature, with minimal intervention. There is increasing evidence to suggest that this can occur in urban areas too, with benefits for wildlife and people, even through small projects.
- **Delivering Biodiversity Net Gain:** The Environment Bill is an emerging legal framework that considers air pollution, water quality and nature conservation. From 2023 it is likely that, by law, a minimum 10 per cent gain will be required on developments that are over 0.1 ha, with such gains needing to be secured for at least 30 years. The Local Plan can also set priorities for biodiversity within Newham. For example, targets on creating woodland or enhancing ecological networks. Such priorities help developers to make meaningful contributions through Biodiversity Net Gain.
- Putting an economic value to green space: The Mayor of London is promoting a 'Natural Capital Account' for London. It can help to inform and improve decision-making by framing public green spaces as economic assets, and highlighting the range and value of benefits that they provide.



• Newham – an urban playground: London is a youthful city, with Newham the youngest of all the boroughs. Child and young person-friendly places are recognised in London and globally as an essential component of inclusive place making. The GLA's Making London Child-Friendly report states that "cities that are safe for children tend to be safe for everyone", whilst ARUP's Cities Alive publication argues that "the benefits of a child-friendly city go beyond children to add value to all citizens' lives, child-friendly urban planning is a vital part of creating inclusive cities that work better for everyone". Bringing these concepts into planning for green and blue spaces can help bring benefits for everyone.

• How open space is delivered and managed - raising **expectations:** New public spaces in London are increasingly privately owned, which has led to some restrictions on how spaces are used and confusion around responsibilities and maintenance. The GLA's emerging Public London Charter consists of eight principles which are directed to the users, owner and manager of public spaces. The aim of the Charter is to ensure that London's public spaces are safe, accessible, inclusive, attractive, well-connected and easy to understand, well maintained and service. The funding and management of the borough's green and blue spaces is of fundamental importance. Whether publicly or privately owned, open spaces should be managed to be welcoming to all and provide amenities, in particular spaces for sport, play and to socialise, that reflect local needs.

- Towards a Better Newham: COVID-19 Recovery Strategy
- Newham Climate Emergency Action Plan
- Newham Social Integration Strategy
- Well Newham 50 Steps to a Healthier Borough.
   Part 2: The Evidence for Action
- Public Health England: Spatial Planning for Health
- <u>Urban Greening for Biodiversity Net Gain: A</u>
   Design Guide
- <u>Using Green Infrastructure to protect people</u> from air pollution
- Draft Public London Charter
- Natural capital accounts for public green space in London
- Making London Child-friendly. Designing Places and Streets for Children and Young People
- Arup, Cities Alive: Designing for Urban Childhoods



#### What evidence will we use?

#### Green Infrastructure Strategy with supporting Parks and Green Spaces Plan, Local Nature Recovery Plan and Local Urban Forest Plan:

- This will be informed by a green and blue infrastructure needs assessment and will set out where Newham's green and blue spaces will be delivered and protected.
- It will inform biodiversity, open and blue space
  policies, guided by an up-to-date picture of our needs
  (from analysis of our existing green and blue assets
  and population requirements).
- It will help us to identify the size, type and location space needed, reflecting local access and identify areas of underuse and highlight opportunities for improving connectivity, access and quality.
- Consider borough-specific targets or standards (Biodiversity Net Gain / Urban Greening Factor / Natural Capital).

### Play and informal recreation needs assessment:

- An audit of existing play and informal recreation opportunities to identify the quantity, quality and accessibility of play and informal recreation provision.
- This work will inform a strategy on play and informal recreation facilities and opportunities which will be supported by Local Plan policy.

#### **Characterisation Study:**

 The Characterisation Study will help to identify the 15 minute neighbourhoods which make up our borough.
 Working with residents, this piece of work will help to better understand how Newham's neighbourhoods are served by existing open spaces.

#### Burial space needs assessment:

- An audit of existing provision and opportunities for the re-use of burial space, taking account of the fact that different faith groups have different needs for burial provision.
- Work with neighbouring boroughs and sub-regionally to identify and address the requirements and to tackle burial space shortages within the sub-region.





### Proposed policy changes:

- 1. Access to green and blue spaces: Emerging evidence will inform our approach to a Newham Open Space Standard. This will set out the minimum open space standard per population we would like to see for Newham. We will then use our evidence base to identify areas of the borough which are deficient and propose policy and allocation proposals to reduce these deficits.
- Explore the metric of 'functionality', how to apply and measure it. Our evidence base will consider what 'no net loss of functionality' means when protecting green and blue space and whether our current approach is sufficient. Should we not have enough open space, we may seek to protect all open space and not just its broader function or protect it in certain locations. We will need to balance this against the requirements to deliver more homes and other uses. However, it could be that a development may reduce the amount of open space, but in doing so improve the quality of that space as a place for our communities to enjoy, be a more biodiverse habitat for wildlife and help address the climate emergency.
- 3. A Newham's approach to 10 percent Biodiversity Net Gain. Newham is an urban area with much of our development occurring on brownfield sites with limited existing biodiversity. As such, how a 10 percent net gain benefits a borough like ours is very different to those other parts of the country which have higher a biodiversity baseline. We will therefore consider the benefits of introducing a requirement for a higher Biodiversity Net Gain percentage.

- 4. A Newham Urban Greening Factor (UGF). Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity, recreation and health and wellbeing. The London Plan recommends pan-London interim UGF target scores. Using our emerging evidence base, we will explore introducing a Newham-specific UGF, one which is tailored to local circumstances and which helps address the climate emergency.
- 5. Strengthen the link to air pollution and improvements to biodiversity and green infrastructure interventions. Consider providing guidance on the location and selection of species for landscaping to maximise impact in terms of removing air pollutants. Vegetation selection can play an important role at a regional scale but the main policy guidance will be on how vegetation at a street scale can be used to control the flow of pollutants.
- 6. Specific guidance on aviation and biodiversity. Located in Newham, London City Airport can comment on and seek to restrict the type of urban greening on new developments. This is to discourage birds in areas close to the airport or under the flight path as this can lead to bird strike. Despite this, the current Local Plan is silent on the airport's impact on the biodiversity measures a scheme can deliver. We will try to explore this in our emerging evidence and provide greater guidance on what is and isn't possible in these locations. We will also develop better monitoring of the types of urban greening which is being permitted in the areas impacted by the airport.

- 7. A public realm management plan requirement:
  Policy will set out how we will ensure that
  our green and blue spaces are designed to be
  welcoming, accessible and maintained over time.
  We could require new green and blue spaces to
  meet and deliver the draft Public London Charter,
  or we could develop a Newham-specific approach.
  This could be secured through a legal agreement
  linked to the planning permission (such as an s106
  agreement).
- 8. Promote the co-design of green and blue spaces: We will explore how to meaningfully involve residents in the design of green and blue space and how to involve communities in the ongoing decision making which takes place once a new green or blue space is delivered.
- Clarifying the priorities for our blue spaces: Newham has a significant number of water spaces, including the Royal Docks. These spaces provide significant habitats for wildlife, as well as unique visual amenity which give many parts of Newham a specific identity. There are also opportunities for leisure uses and activities both on and around the water. These different uses need to be balanced. Policy could set out guidance to deliver this balance, for example it could set out what we consider to be water dependant activities and where different uses should be located.
- 10. Burial space: We will reflect on the findings of the needs assessment to consider potential suitable locations for new burial space, both within Newham and in other places accessible to our communities. In doing this, we will consider Newham's built environment and the needs for other land uses.

- 11. Create a new policy structure: Some of the policies in this chapter overlap and repeat. It is proposed to have instead two policies, one focused on green spaces the other on blue spaces. Each policy will consider protection, enhancement, accessibility, connectivity and recreational value, our approach to management and maintenance and importantly and delivery. In addition, we are considering the introduction of new polices to set out further detail on particular aspects of blue and green infrastructure:
  - a. An urban greening policy: set out Newham's approach to Biodiversity Net Gain and will explore an Urban Greening Factor for Newham.
  - b. **Policy for trees:** to increase the number of trees and overall canopy cover. A new policy to set out in greater clarity our approach to the borough's trees. We will seek to reduce the loss of mature and semi mature trees. Appropriate trees should be designed into developments from the outset. Newham's emerging 'Local Urban Forest Plan' will inform decisions on planning applications.
  - c. Policy for play: guidance on child friendly design. A new policy provide clear direction and guidance on play and informal recreation. Based on an up-to-date assessment of need, we will encourage developments to provide new or enhanced outdoor sports facilities, playing pitches and child and young person play and recreation provision. This will include a requirement for accessible and inclusive playground equipment. We will work with the young people in our borough to co-design our approach to this policy.



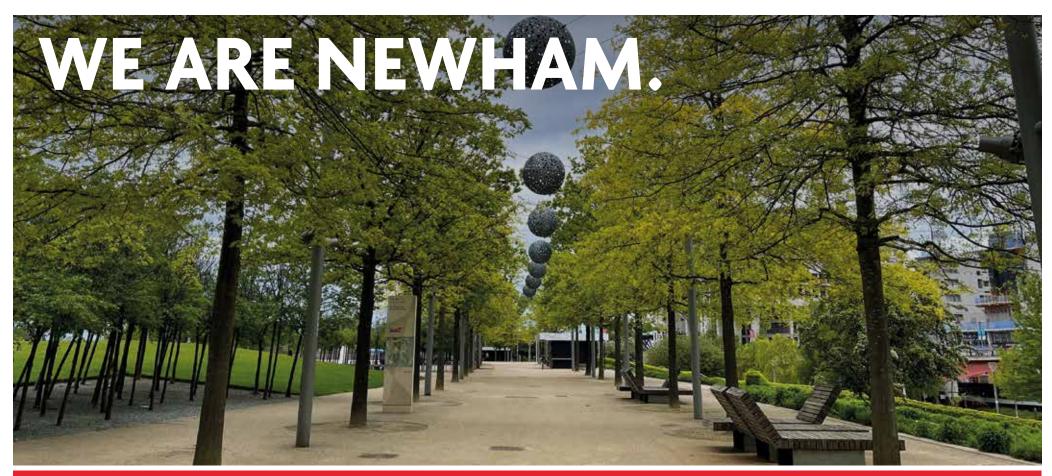
### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- What do you think the priorities for our green spaces should be?
- •What do you think the priorities for blue spaces should be?





# WE ARE SHAPING.



OUR CLIMATE.



#### Introduction

Ensuring that development can occur in Newham without adversely affecting, and ideally 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 the emissions which contribute to the climate emergency, mitigate impacts of climate change, and minimise and avoid the risks of all sources of flooding.

In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change, poor air quality and low levels of recycling. In the lead up to COP26 in November, the Council is also keen to lead the way in how local government can respond to this emergency crisis. Planning policy has a key role in delivering these measures to meet our target to be carbon neutral by 2030.

The current Local Plan policies that relate to this topic are:

- SC1: Environmental Resilience
- SC2: Energy and Zero Carbon
- SC3: Flood Risk and Drainage
- SC5: Air Quality

# What does our current policy seek to achieve?

#### Policy SC1 – Environmental Resilience

- Development will both protect the environment and become more resilient to it, particularly from effects of climate change.
- Development should also be more resource efficient.
- Remediate contaminated land.

#### Policy SC2 – Energy and Zero Carbon

- All development will minimise and reduce carbon emissions, with major development meeting London Plan Zero Carbon targets.
- Local energy generation and use of waste energy/ heat for other beneficial uses is also encouraged.

#### Policy SC3 – Flood Risk and Drainage

- Sequential Tests required to demonstrate flood risk reduction in line with national policy and Environment Agency advice as well as setting out detailed design and construction details to reduce the exposure of new development and occupiers to flooding.
- Flood risk will be reduced, and development will not increase flood risk to any location.

#### Policy SC5 – Air Quality

 Minimising air pollution generation, support a decrease in pollutants and support the actions of the Newham Air Quality Action Plan.

### What you've told us

- The Citizens' Assembly on Climate Change issued recommendations for the Council, several of which are key to this policy:
- Improve Newham's air quality by installing pollution monitors across the borough and by protecting trees, expanding green spaces and not allowing new buildings in existing public parks.
- Planning decisions should all support biodiversity, cleaner air and 'greening' as a central priority. All new buildings to initiate green standards.
- Introduce policies and planning for deep retrofit of all existing buildings and infrastructure to be completed by 2030 to be carbon neutral e.g. roofing spaces – introduce more greenery and solar panels and rainwater collection.
- As part of Newham High Streets programme, feedback from Forest Gate, Green St, Little Ilford, Manor Park indicated that the environment and climate was the most or second most important theme for respondents. Concerns were also raised regarding pollution and levels of traffic in local communities.
- Young people have told us that access to nature and green spaces is important to young people; large parts of Newham were felt to be industrial and grey

   "Where I live it's just buildings going into the sky.
   We don't even have birds here"; that London City Airport harms young people's quality of life, with the feeling that neighbourhoods near the airport are very polluted and noisy.

- Suggestions from these young residents was that a cleaner air strategy should be implemented to improve air quality around polluted areas.
- Water conservation and flood risk are important issues for residents and there is support for the development of locally based strategies to better manage this.
- Surface water on roads in the Royal Docks make areas unpleasant and less desirable to walk and cycle and impacts key routes.
- The prevalence of poor air quality across the borough is a concern, with requests for more walking and cycling facilities and encouraging the number of zero emission vehicles.
- Overheating in new build dwellings in Newham is affecting residents, particularly in new build developments.
- There is concern about disproportionate heating costs (Combined Heat and Power) for new dwellings in Newham.

- Newham Citizens' Assembly on Climate Change
- Newham High Streets consultation
- We Make Newham: Youth Assembly Event Findings Report 2021
- Newham Royal Docks Corridor scheme consultation



#### What does the data tell us?

- 14% of the borough's population is exposed to NO2 levels above the air quality objective (AQO) for human health and on average all Newham residents are exposed to levels of PM2.5 that is 35% greater than the WHO guideline.
- Over the last 20 years, CO2 emissions have gradually decreased in London, especially from Industrial, Commercial and Domestic sources – however emissions from transport have fallen just 3% since 1990.
- CO2 emissions in London by sector are 32.8% from Domestic sources, 32.5% from Industrial and Commercial sources and 25.2% from Transport sources.
- Two thirds of flats in London are estimated to experience overheating (temperatures greater than 28 degrees) by the 2030s.
- There have been substantial payments of net zero carbon offset payments to the Council £13m following the London Plan requirements. We are unaware of major developments in the borough that are being built as net zero developments without the need for offset payments nor to standards closer to net zero on site.
- By 2070 it is expected that extreme hourly rainfall intensity associated with an event that typically occurs once every two years will increase by 25%.
- Sea levels in London are "very likely" to see between 0.53m and 1.15m of sea level rise by 2100 under a high carbon emission scenario.

 It should be noted, that monitoring of these policy areas can be challenging, with difficulties in tracking data and some data only available at national and regional levels.

- Air Quality Action Plan
- BEIS 2021
- Newham Carbon offset fund
- Climate Change Risks for London: A review of the Evidence
- Met Office UK Climate Projections

# What are we required to consider and plan for?

#### National Planning Policy Framework (2021)

- Environment is one of the three overarching objectives which need to be balanced in order to deliver sustainable development.
- Local Plans should:
- Achieve Sustainable Development allowing development to meet the needs of the present without compromising the future.
- Meet the challenge of climate change, flooding and coastal change – supporting the transition to a low carbon future, taking into account flood risk and coastal change.
- Shape places to radically reduce greenhouse gas emissions, minimise vulnerability and improve resilience.
- Conserve and protect the natural environment including addressing contaminated land, pollution and air quality.
- Set out how the impacts of climate change will be reduced and its effects minimised.
- Be informed by a Strategic Flood Risk Assessment (SFRA) and utilise data and information from the Environment Agency and other relevant flood risk management authorities.

#### **The Climate Change Act 2008**

- In 2019, the UK Government has set a target of net zero carbon by 2050.
- The forthcoming Environment Bill will expand on this further, with greater emphasis on biodiversity net gain and targets on air pollution, water quality and resource use.

#### The London Plan (2021)

- London will be a zero carbon city by 2050.
- Buildings and infrastructure should be resilient to climate change.
- Developments should be air quality neutral and in some cases air quality positive.
- Developments should follow the energy hierarchy: Be lean, clean, green and seen.
- Major development should be net zero carbon with a minimum on site reduction of at least 35% beyond Building Regulations.
- Developments should manage heat risk, in accordance with the cooling hierarchy.
- Developments should reduce water use and achieve consumption of 105 litres or less per head per day.

# Relevant London Plan Chapters and Policies:

- Policy D14 Noise
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage

# What new trends and objectives do we want to address?

- Newham carbon neutral by 2030, and to achieve net zero greenhouse gas emissions nationally by **2050:** The ambitious targets set nationally and locally will require development in Newham to assist in achieving these goals. CO2 emissions data indicates that residential, commercial and industrial uses are all significant contributors to greenhouse gases. This is while ensuring that a high quality of life, economic development and Community Wealth Building is encouraged and maintained. Newham should be working towards greater delivery of Net Zero on site, reducing the amount of embodied carbon in the construction of buildings, as well as achieving higher standards for a wider range of buildings – following the guidance of the London wide Low Carbon Working Group, and the Newham Recovery Strategy.
- Improved Air Quality: Air Quality is a key issue in Newham. Although work to reduce transportation emissions will help in reducing air quality, it is likely that as development pressures increase and more constrained sites are brought forward there will be increasing pressure for residential development in areas of poor air quality. There is increasing research on ways air pollution can be both reduced and mitigated for, so that its impacts on occupants of new developments is reduced.

- Concerns regarding 'urban heat island' and overheating in new dwellings: The UK climate is changing. Headline impacts of climate change note that London will experience hotter and drier summers. Discussions with local residents indicates that increasing temperatures is a growing issue. This must be addressed given the trend of hotter average temperatures in recent years, and the quantum of high density, flatted development coming forward in Newham, which can be more prone to overheating.
- Building a green economy: This objective is discussed in more detail in the Inclusive Economy topic and can be supported through considering how environmental standards and greening can apply to industrial and commercial buildings.
- Including considerations of environmental justice in our approach: Reflecting Community Wealth Building objectives and our commitment to tackling racism, inequality and disproportionality, we want to consider how we can embed commitments to environmental justice in our approach. This approach ensures that the distribution of environmental benefits and any potential dis-benefits are fairly distributed and acknowledge other inequalities in the borough. This may impact our prioritisation of carbon offset funding or how we locate different uses in relate to pollution sources.

• Increased risk of flooding and surface water runoff: Flooding projections for London identify that more intense rainfall patterns will occur alongside the potential for increased storm surges from sea level rise. With the climate changing and in heavily urbanised areas which are less resilient to flooding, exposure to surface water runoff and drainage is increasingly important to people's experience and perception of place and their overall health and safety. Commitment supporting Newham Local Flood Risk Management Strategy is important as to how the Council manages these issues related to surface water and drainage requirements.

- London Councils Low Carbon Working Group
- Newham Towards a Better Newham Reorientation and Recovery Strategy
- Newham Air Quality Action Plan
- Newham Community Wealth Building Strategy
- Newham Local Flood Risk Management Strategy
- Climate Change Risks for London: A review of the Evidence



#### What evidence will we use?

#### **Carbon Reduction Evidence Base:**

- An assessment of the most effective and deliverable measures to reduce carbon production from new buildings and construction work.
- This would also include work on overheating impacts, retrofitting existing buildings, and options regarding on site carbon reduction.

#### **Strategic Flood Risk Assessment:**

- A technical assessment and consideration of flood risk across the borough for the duration of the plan to inform the sequential and impact tests.
- Newham Local Flood Risk Management Strategy Guidance on how Newham manages issues relating to surface water flood risk and sustainable drainage requirements.

#### Riverside Strategy (led by Royal Docks Team)

- Will set out design guidance to support the implementation of raising flood defences and design detail to future changes to the riverside take place in a planned and integrated way which maximise the environmental, social and economic benefits.
- The document will be supplementary to the Royal Docks and Beckton Opportunity Area Planning Framework.

#### The Characterisation Study:

 Will investigate design approaches to air quality mitigation, including the impact of greenspace and air pollution funnelling.



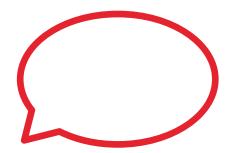
### **Proposed policy changes:**

- **Encouraging Retrofit:** Many of Newham's houses have poor energy efficiency to address this we need to encourage properties to be retrofitted. We are interested in how we should balance against heritage and design considerations.
- Overheating in homes and in streets: It is currently challenging to measure potential overheating risks of a building. However, with the rise in temperatures we will need mitigate and monitor these risks, without causing further environmental impact. Using energy hungry air conditioners to cool buildings should not be the solution.
- **Encourage greater energy efficiency on site:** At present, only major development must meet London Plan Zero Carbon targets. Many of these major developments cannot or will not deliver all carbon reductions on site, and pay carbon offset fees instead. To meet Zero Carbon by 2050, all properties will have to be retrofitted - including many of those under construction. We want to explore how we can reduce the need for this future retrofitting by improving current standards. Newham's own housing delivery is exploring delivering new affordable homes to ultra-low energy efficiency standards like Passivhaus. We want to explore how Newham can encourage smaller developments to be more energy efficient, and as well as ensuring more major developments get closer to or achieve net zero on site. Potential proposals include rewarding for developers where energy efficiency performance exceeds delivery targets and conversely, clawback where performance is below target. We want to explore how levels of embodied carbon in new development can be reduced. We want to encourage use of roof space to generate electricity and heat, while allowing for multifunctional benefits, for example, green roofs. Evidence around the best ways to achieve this will be developed to progress any policy requirements and would be subject to viability testing. This objective may also need to be balanced against other policy requirements.
- 4. Use of greater quantity of air quality data in decision making to minimise exposure: Air quality data is increasingly available to officers, and the policy should be strengthened in light of this, to both reduce exposure through design and also to require ongoing monitoring to ensure this is maintained. Approaches could include a hierarchy of vulnerable users so schools and play spaces are placed furthest from roads as well as requirements which secure ongoing monitoring.
- **Reducing impacts of noise and light pollution:**Given the increased density of development in Newham, the policies regarding noise and light pollution will be strengthened to ensure a high quality of life for new and existing residents alike. This will include consideration of post occupation monitoring and, where feasible, further mitigation measures.
- Providing more detailed flood risk reduction guidance: To ensure new developments optimise their contributions towards reducing flood risk from all sources and for the long term, we want to provide further guidance on the measures which should be taken. This could include referencing in policy Newham's Sustainable Drainage System Design and Evaluation Guidance to better incorporate sustainable drainage solutions at the earliest possible stage as well as considering widening the types and locations of developments which should incorporate these requirements, due to the increasing likelihood, severity and geographic scope of flooding. We will also reference the Riverside Strategy, which will provide detailed guidance for the south of the borough on delivering long term flood defences at the earliest feasible stage.



#### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- How do we encourage all developers to deliver net zero on site today, and minimise retrofit costs in the next 20 years?
- In some parts of borough, the environment is harsh (windy, barren, poor air quality, too hot, bad smell) – how can policies mitigate the impact on residents, and prioritise interventions/ improvements before issues arise?
- What should else be included in this policy to ensure Newham is maximising opportunities to reduce the risks of fluvial and surface water flooding?
- How can Newham assess the potential for overheating of new buildings, and how can Newham monitor this following delivery of a development?





# WE ARE SHAPING.



OUR TRANSPORT.



#### Introduction

High quality, sustainable transport helps to ensure economic growth, allows mobility for all and assists in tackling the Climate Emergency. This topic covers all forms of transport in Newham – walking, cycling, public transport, cars, vans and heavy goods vehicles.

Newham has enjoyed substantial investment in public transport (DLR, Jubilee line, High Speed 1, Crossrail) over the last 40 years. Newham also has a high percentage of stations with step free access when compared to other boroughs. However, the borough is still very car dominated, with low levels of walking and cycling modal share, poor air quality and difficult north-south connectivity.

The current Local Plan policies that relate to this topic are:

- INF1: Strategic Transport
- INF2: Sustainable Transport

# What does our current policy seek to achieve?

#### **INF1: Strategic Transport**

- Secure investment in strategic transport networks, levering investment and regeneration into Newham.
- Achieve modal shift to sustainable transport, further integrating the borough with the rest of London.

#### **INF2: Sustainable Transport**

- Secure a more sustainable pattern of movement in Newham, maximising the efficiency and accessibility of the borough's transport network on foot, cycle and public transport.
- Maximum and minimum car and cycle parking standards and the use of Travel Plans.

### What you've told us

- Residents specifically requested improvements to road safety and improved cycle routes as part of Low Traffic Neighbourhoods work.
- As part of Newham High Streets programme, feedback from Forest Gate, Green St, Little Ilford, Manor Park indicated that residents felt that there are too many cars, that areas are not pedestrian friendly, and there is a lack of parking in Green Street. There was praise for the new improved public realm and wide pavements at Forest Gate and Manor Park.
- Feedback from residents regarding the road layout and street environment in the Royal Docks indicated that high vehicle speeds and dangerous driving, volume of HGV traffic and overall dominance of vehicles is of concern in the area.
- Residents in the Royal Docks liked the proposed wider pavements, narrower road lanes to slow traffic, improved cycling facilities and public realm including planting as proposed solutions.
- In Stratford, residents praised the recent Stratford Gyratory improvements works, but wished for better public realm and connections between various parts of Stratford. A sense of disconnection across the railway tracks was also noted "definitely two sides to Stratford".

- Specific feedback from the Newham Youth Assembly included that Newham is not pedestrian friendly, with many noting that traffic is very dominating "traffic is bad and scary on the way to school" and that "the government can't expect us to cycle when there's no cycle lanes and the traffic is quite a lot it's kind of scary actually."
- Suggestions from this Youth Assembly were to:
  - Create more pedestrian-friendly walking routes across the borough, particularly around schools and youth spaces.
  - Increase cycling provisions across the borough. Provide more cycle-only lanes that are physically separated from traffic by barriers or vegetation.
  - Prioritise people-friendly development over those designed in favour of vehicles.
  - Implement a cleaner air strategy to improve air quality around polluted areas.
  - More child-friendly walking routes.
- Residents have expressed concerns regarding levels of traffic and road safety.
- There is considered to be a lack of electric vehicle charging points across the borough.
- High levels of overcrowding on the DLR and the Jubilee line.
- Requests to improve cycle routes across the borough.
- Concerns regarding residents parking and emissions based parking permits.

- Newham Low Traffic Neighbourhoods
- Newham High Streets consultation
- Newham Royal Docks Corridor consultation
- Newham Stratford Masterplan engagement
- We Make Newham: Youth Assembly Event Findings Report 2021

#### What does the data tell us?

- One in seven of Newham's population are exposed to levels of Nitrogen dioxide (NO2) 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% greater than the World Health Organisation guidelines. Poor air quality in the borough kills 96 residents every year. This air quality monitoring data also clearly shows that poor air quality is concentrated along major roads in the borough.
- Healthy life expectancy at birth is nine to ten years less in Newham than for England's healthiest areas (PHE 2019). The premature death rate from cardiovascular disease is significantly worse for Newham compared to the rest of England. (PHE 2019)
- Newham has the highest public transport mode share at almost 41 per cent, almost 6 percentage points higher than the inner London average. However, cycling modal share in Newham is poor, at around 2 to 3% - and in recent years, the reduction in car use has plateaued.
- Newham has the fourth lowest car ownership rate per head in UK - 52% of households do not own a car.
- Of the 28 TfL stations in Newham, only 4 stations lack step free access. This is one of the highest levels of public transport accessibility in London.
- There is a net daily outflow of 30,000 workers (predominantly westward to central London).



- As of July 2021, TfL network public transport
  passenger numbers are still 54% below pre-pandemic
  levels in London, whereas car, van and heavy goods
  vehicle use in London has returned to pre-pandemic
  levels.
- Newham has been closely monitoring implementation of Low Traffic Neighbourhoods (LTN) and School Streets, making changes following feedback from local residents. A recent Government commissioned survey on those living in, or near, a LTN indicated that:
- 79% of respondents supported a reduction of traffic in their local area.
- 69% of respondents supported reallocation of road space for walking and cycling.
- 61% of respondents supported their local LTN.

- Newham Air Quality Action Plan
- Transport for London Travel in London 13
- Office of National Statistics Census
- Gear change: a bold vision for cycling and walking: One Year Review, Public Health England



# What are we required to consider and plan for?

#### National Planning Policy Framework

- Developments and Local Plans should promote healthy and safe communities – through street layouts, high quality public realm and safe and legible pedestrian and cycle routes.
- Developments and Local Plans should promote sustainable transport – by considering transport from the earliest stages, addressing potential impacts on transport networks and prioritising pedestrians, cycling and public transport.

#### The London Plan (2021)

- 80% of trips across London should be made on foot, cycle or public transport by 2041, with an expectation this is 90% of trips in Inner London (which includes Newham). Sets a range of car and cycle parking standards for different uses. Local authorities in London are obliged to follow these standards.
- Local Plans should apply the Mayor's Healthy Streets Approach.
- Local Plans should reflect and be integrated with current and planned transport access, capacity and connectivity to ensure a sustainable transport network to support growth.
- The Mayor of London has also adopted a Vision Zero approach in London with the aim is for no one to be killed in or by a London bus by 2030, and for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041.

### Relevant London Plan Chapters and Policies:

- Chapter 10 Transport
- Policy SI 1 Improving air quality
- Policy SI 14 Waterways strategic role; Policy SI 15 Water transport
- Policy SI 16 Waterways use and enjoyment

# What new trends and objectives do we want to address?

- Newham carbon neutral by 2030, and to achieve net zero greenhouse gas emissions nationally by 2050: Newham declared a climate emergency in 2019, and Climate Emergency Action Plan sets out what the council proposes to do in the short term to help with this. Increasing modal shift from transport which produces greenhouse gases to low-emission mobility is a key component of tackling the climate emergency. Policy will need to consider ways to make it as easy as possible for residents and businesses to make this transition, working alongside other council policies, including the introduction of an emissions-based residential parking scheme.
- Active Travel: The council has made big efforts to improve active travel – walking, cycling and other sustainable modes – especially during the COVID-19 pandemic. Active travel is key, not just to reduce emissions, but also to help deliver the objectives of the 50 Steps to a Healthier Newham Strategy. Low Traffic Neighbourhoods, School Streets and other "pop up" interventions have been rolled out across the borough. The Local Plan can help to support these interim works to become permanent, with public realm improvements and by requiring developments to place walking, cycling and public transport use foremost in their designs. However consideration needs to be given to any potential trade-offs in how this may re-route traffic, with a focus on interventions which lead to an overall traffic reduction.

- Long term impacts of COVID-19: As of July 2021, public transport use has not returned to normal, with the number of cars on the roads back to its previous levels. There is a risk that if this persists it will undermine long standing work to increase public transport and walking and cycling modal share. Pillar 6 of Newham's Recovery Strategy states that "We will become London's greenest local economy", with strategic outcome 6.3 stating that "Travel in Newham is green, safe and sustainable". As the Plan develops we will need to monitor these trends and understand their underlying causes to implement policies and spatial approaches which continue to encourage active and low-carbon travel.
- Deliveries, servicing and their impact on the road network: The substantial increase in parcel deliveries is severely impacting Newham's roads with Centre for London estimating a 50% increase in van mileage in London since 2000. The increase in online shopping during COVID-19 also looks like it will persist, further exacerbating this growth. Newham will need to work carefully to mitigate the impacts of deliveries, encouraging more efficient "last mile" distribution and reduce congestion and air pollution. The impact of increasing parcel delivery is also felt in servicing bays and visitor parking at developments, which may need to be managed.
- 15 minute neighbourhoods: As part of the work to deliver and strengthen 15 minute neighbourhoods, transportation will be key in reducing travel time in the borough and increasing access for residents. For example, connecting disconnected communities across existing barriers rivers, roads, railways etc. or the provision of a new route could increase the functional boundary of a 15 minute neighbourhood.

- Air Quality and electrification of the transport network: Transportation is key in reducing the high levels of poor air quality in Newham. Since adoption of the Local Plan, the take up of Zero Emission Vehicles has increased dramatically whether cars, taxis, vans or buses and we want to continue to support greater electrification. Electrification of the road network is not a cure-all traffic congestion, particulate pollution and Vision Zero will remain issues in a car dependent society. Transportation policies should continue to encourage a more sustainable and equitable transportation hierarchy.
- **New technology:** New technology such as E-scooters, E-bikes, a wider range of zero emission vehicles, drones, autonomous shuttles have been arriving at pace in recent years, and the Local Plan needs to reflect and support these where necessary. Potential conflicts between users must also be mitigated, and new technology must not negatively impact residents or the wider transport network.

- Newham Climate Emergency Action Plan
- Newham Climate Emergency declaration
- HM Government Carbon Budget
- 50 Steps to a Healthier Newham Strategy
- Towards a Better Newham Re-orientation and Recovery Strategy
- Centre for London Freight and deliveries
- Newham Air Quality Action Plan

#### What evidence will we use?

#### **Transport Evidence Base**

- Will assess the impact of the proposed housing and employment growth across the borough on the transport network.
- Propose required transport interventions to ensure sufficient transport capacity to support the proposed growth strategy.

#### Infrastructure Delivery Plan

- Identifies what infrastructure is required in what locations to support growth and deliver the Plan's objectives.
- It pulls together best-available information from a range of sources including TfL, the NHS, other external bodies and other Council departments.

#### Royal Docks & Beckton Riverside Opportunity Area Planning Framework Local Connections Study and Royal Docks Team Walking and Cycling study (led by the Royal Docks Team and GLA)

 These two documents set out the improvements to the local walking and cycling networks necessary to encourage future development in the Royal Docks.

# Newham Air Quality Action Plan (2019) (led by LBN Environmental Health team)

This sets out aims and objectives to reduce poor air quality in Newham

# Newham Cycling Strategy 2017-2024 (led by LBN Transport)

• Sets out how the Council will support cycling and deliver greater numbers of trips in Newham.

# LBN Transport Corporate Policy – Local Implementation Plan and Transport Strategy for Newham (led by LBN Transport)

 These two documents will outline Newham's local transportation work over the next 5 years or so, implementing Local Traffic Neighbourhoods and other interventions.

### Streetscape Highways Design Guide (led by LBN Transport)

 This document will assist developers and the Council to deliver high quality public realm and reduce car dependence on borough roads.



### **Proposed policy changes:**

- 1. Reflecting new strategic transport projects: Our spatial strategy and the approach to supporting new transport projects will reflect the latest proposals from Transport for London (TfL), such as the extension of the DLR to Beckton Riverside and Thamesmead, and electrification of the bus fleet. As the Local Plan develops, we will work with TfL and other partners to lobby for continued support of these key projects, recognising Transport for London's current financial position.
- 2. Supporting the continued rollout and permanent implementation of Low Traffic Neighbourhoods, School Streets and cycle lanes: This will help to encouraging streets to become less car dominated, improve the public realm and increase walking and cycling modal share. We will examine how policies can require new development to support and contribute to this work, following the Healthy Streets guidance.
- Preparing the borough for a Zero Carbon future: Although a borough focused on the car will not be appropriate, there will be a need for electric vehicles in the future. Charging points will be need to be located across the borough on streets and in car parks rather just in new developments, to ensure convenient charging points for all electric car users. As fewer developments have onsite car parking provision, we will consider how new developments of all types can contribute to the development of this network.

- Greater focus on reducing car use and car dominance: We will amend our policies so that the car parking is in line with the London Plan (car free as the starting point), as well as go further to ensure better car club coverage, high quality and plentiful cycle parking, and provision for charging of E-bikes, electric scooters, and mobility scooters.
- Considering the need for targeted parking **provision:** We are committed to reducing car use and car dominance in the borough but do recognise there are a number of residents who require car parking to undertake their work, for example home care workers, taxi and delivery drivers. As working patterns continue to shift post pandemic, where such workers need to park their cars may be changing. This is alongside ensuring we have adequate provision for disabled drivers, with provision located in easily accessible locations within development sites. We will work alongside colleagues in parking to consider appropriate, evidence based options, to address this need. This may include options regarding the distribution of any car parking spaces provided on site, acknowledging this may have viability impacts.
- 6. Reducing the impact of deliveries in the borough: In order to reduce the number of individual deliveries on the road, as well as reducing the impact at dense residential developments, we propose to consider more sustainable last mile solutions such as encouraging cargo bikes, micro distribution centres and parcel lockers.



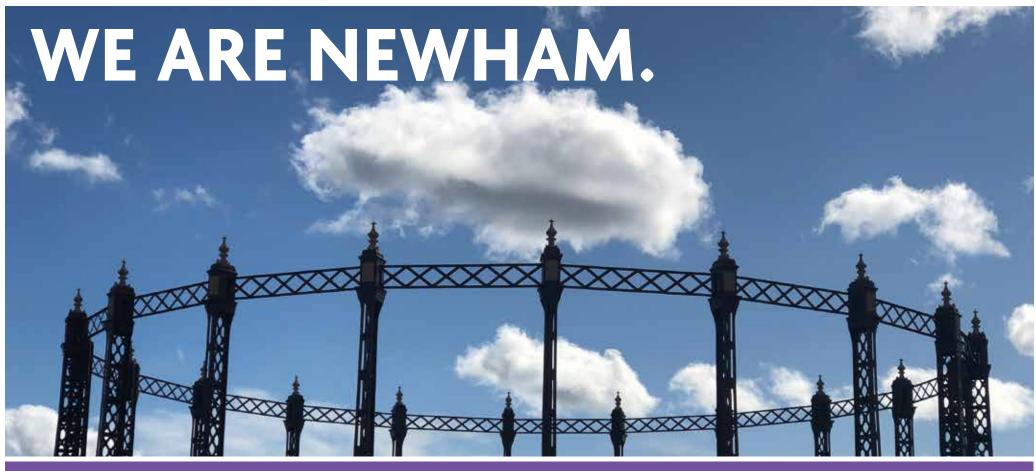
### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- How can Newham gain greater coverage of electric charging points across the borough?
- Do you have any further ideas on how to encourage a reduction in car use and greater use of active travel modes?





# WE ARE SHAPING.



OUR WASTE AND UTILITIES.



#### Introduction

Waste and utilities are essential pieces of infrastructure for creating a healthy environment and connecting new development to vital services. Waste and recycling policies guide the management of waste in new developments and the operation of waste management facilities. Local Plan policy 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. Alongside the Local Plan, the East London Joint Waste Plan ensures we safeguard enough waste management sites to manage waste in east London (Newham, Redbridge, Barking and Dagenham and Havering). We are also commissioning evidence to update the Joint Waste Plan.

It is also important we secure sufficient utilities infrastructure to meet the needs of new developments. This infrastructure includes energy, water supply, wastewater handling, telecoms and digital connectivity. Improvements to utilities infrastructure are primarily planned by major utilities providers (particularly for waste water and power), who are seeking to deliver capacity upgrades to support growth and meet future demands in London. These upgrades are mainly planned in the Royal Docks and Beckton.

The current Local Plan policies that relate to this topic are:

- INF3: Waste and Recycling
- INF4: Utilities Infrastructure

# What does our current policy seek to achieve?

#### **INF3 Waste and Recycling**

- Requires that the management of waste and development of waste facilities follows the waste hierarchy (reduce, reuse, recycle, and energy recovery before disposal).
- Prioritises rail and water-based transport of waste and aims to deal with waste as close to the source as possible, minimising the impacts of waste management and waste facilities.
- Compliance with the provisions of the East London Waste Plan and the London Plan.

#### **INF4** Utilities Infrastructure

- Supports projects which increase utility provision to meet growing demand principally via projects identified in Newham's Infrastructure Delivery Plan.
- Minimise infrastructures' land take as well as other spatial and environmental impacts (noise, smell, visual intrusion).
- Supports the expansion of decentralised energy networks as well as the use of innovative technologies to reduce fossil fuel use and emissions by exploiting sustainable or waste energy sources (for example, air, ground, waste, and water heat pumps).

### What you've told us

- Residents strongly support reuse and recycling of waste, and have a positive view of recycling facilities.
- Waste bags in the street and litter are seen as the main contributors to unclean streets.
- Previous Citizens' Assemblies show support for waste and recycling projects, particularly those aimed at reducing fly tipping, litter and waste in front gardens and improving recycling rates.
- Young people highlighted that broadband is too slow particularly in North Woolwich & West Silvertown.
- Broadband & WiFi was the third highest (of 11) priority for improvements in the Royal Docks. Waste and recycling services was ninth.
- People noted they avoid areas around Beckton due to environmental impacts smells from the Sewage Treatment Works, reinforcing the importance of mitigating environmental impacts of utilities as a component of creating successful places.
- Digital exclusion exists in Newham, particularly with most vulnerable communities and low-cost and accessible good quality broadband should be a key component of Newham's digital future.

- Citizens' Assemblies
- Newham Survey 2018 and 2019
- Royal Docks and OAPF: Engagement Report
- Digital Inclusion Workshop 2021





#### What does the data tell us?

- Our current policies have successfully protected waste capacity and sites in the right locations.
- Newham's recycling rates have remain some of the lowest in the UK.
- Waste collected per head in Newham is below the national average at 341kg per head (18/19).
- Monitoring of planning applications demonstrate that developments are safeguarding connections to the District Heat Network, but not connecting at construction stage primarily due to the distance to the existing network.
- London Plan evidence notes that in 2015, a large portion of Newham's drains & sewers (combined waste and surface drainage) are already over capacity (at 101-123%). This pressure is expected to continue up to 2050.
- In 2017, access to digital services remained a challenge with 8% of residents having no access to the internet

- Planning applications data 2019
- LA Local Authority Waste Annual Results
- GLA, Housing-led population projections
- Statista, Local authority collected household waste per capita in England 2010-2019
- Thames Water, Wastewater drainage capacity (2015)
- Newham Household Survey 2019.

# What are we required to consider and plan for?

#### **National Planning Policy Framework (2019)**

- Minimising waste and pollution is an important component of achieving sustainable development.
- Strategic policies are expected to set out a strategy and make sufficient provision for telecommunications, waste management, water supply, wastewater and energy infrastructure (including heat networks, which are seen as key in meeting climate change targets).
- Plans should be shaped by early and effective engagement with infrastructure and service providers.

#### Resources and Waste Strategy (2018)

- Sets the Government's strategic ambition to work towards:
- eliminating food waste to landfill by 2030; and
- eliminating avoidable waste of all kinds by 2050.

#### National Planning Policy for Waste (2014)

- Sets out expectation to deliver sustainable development and resource efficiency through driving waste management up the waste hierarchy.
- Requires waste to be dealt with as close to source as possible.
- Waste planning authorities should identify sites and/ or areas for new or enhanced waste management facilities in appropriate locations where there is evidenced need.

#### The London Plan (2021)

- Supports the use of industrial land for utilities infrastructure.
- Seeks early engagement with energy providers to establish future energy requirements including areas of significant growth, such as Opportunity Areas.
   Plans need to identify the need for, and suitable sites for, energy infrastructure requirements.
- Plans should promote improvements to water supply to contribute to security of supply.
- Boroughs should support investment in waste water treatment infrastructure to accommodate growth and climate change impacts, including intensification of existing facilities.
- Plans should support the delivery of full-fibre or equivalent digital infrastructure, with a focus on gaps in connectivity and barriers to digital access. In securing digital connectivity, consideration need to be given to affordability, security, resilience and ensuring adequate power supplies.
- Waste Planning Authorities are expected to promote a more circular economy and meet the following targets.
  - zero biodegradable or recyclable waste to be sent to landfill by 2026
  - 65% of municipal waste to be recycled by 2030
  - 95% reuse/recycling/recovery to be achieved from construction and demolition waste
  - 95% excavation waste to be used for beneficial uses
  - 100% of London's waste to be managed within London by 2026



- Development plans should provide capacity to manage the apportioned tonnages of household, commercial and industrial waste: in Newham, 244,000 tonnes by 2021 and 260,000 tonnes by 2041.
- Development plans should plan for identified waste needs and identify how waste will be reduced in line with 'Circular Economy' principles.
- Safeguards existing waste sites. Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London.

# What new trends and objectives do we want to address?

- The new London Plan and emerging national guidance place emphasis on achieving a 'Circular economy': This concept reflects efforts to retain materials in use at their highest value for as long as possible. Materials are then re-used or recycled, leaving a minimum of residual waste. The benefits of such an approach can save resources, increase economic efficiency and help to lower carbon emissions. Newham's Climate Emergency Action Plan sets out Newham's intention to promote circular economy initiatives, including encouraging work with local reuse and repair organisations. Local circular waste opportunities can have multiple benefits, including supporting community wealth building principles and reducing long distance journeys to obtain materials.
- More efficient use of resources can also help to foster social integration in the borough: This has been demonstrated in the example of the Newham Food alliance, who have utilised surplus food to support food security, rather than letting this resource go to waste. Estimates suggest these actions have saved 3.8 tonnes of CO2 for every tonne of food used.

- Delivering waste reduction and an increase in reuse and recycling are an integral part tackling the climate emergency and central to Newham's ambition to become London's greenest local economy. Planned improvements to recycling collections, new waste guidance and the preparation of a new East London Joint Resources and Waste Strategy should help to optimise recycling and composting rates in future years. Central Government has recently consulted on proposals to increase consistency in recycling, setting out a list of materials that all local authorities and waste firms would be expected to collect. We will continue to monitor these proposals to consider how the design of waste management facilities and new developments may need to shift to accommodate these changes.
- Future proof our infrastructure network: Sufficient utilities capacity is essential to supporting successful and sustainable growth. This is particularly important in the context of climate change and as more development comes forward. Well design and located utilities infrastructure with sufficient capacity will be critical to tackling key issues facing Newham e.g. regular heavy rainfall, reducing carbon emissions. Areas of significant growth, for example, the Royal Docks will require the right infrastructure in the right locations such as electricity capacity to serve new development, including through the delivery of new sub-stations. This has to be aligned with growth needs.

• Changing work patterns and population growth will increasingly rely more on high quality mobile networks and digital connectivity: It is envisaged that the demand for digital infrastructure will continue to increase over the plan period. Reflecting our inclusive economy principles, we want to consider how this can be as affordable and universally available as possible. The provision of 'digital as essential infrastructure' has significant social and economic benefits in which policy must be flexible to respond to emerging technologies and trends to deliver this.

- Newham, Social Integration Strategy
- Newham Climate Emergency Action Plan
- <u>DEFRA</u> Consistency in Household and Business Recycling in England
- Newham Corporate Delivery Plan
- Arcadis Royal Docks Digital Connectivity Report



#### What evidence will we use?

# Joint Waste Plan for the East London Boroughs (and evidence base)

- The Joint Waste Plan is part of the Development Plan. It ensures boroughs safeguard sufficient waste sites to manage their London Plan waste apportionment targets. The current Joint Waste Plan was written before Newham's adopted Local Plan, and, therefore, may be hindering the delivery of more up-to-date strategic objectives, including the delivery of further housing sites and climate objectives.
- The East London boroughs (Barking and Dagenham, Havering, Redbridge and Newham) have procured a joint evidence base to inform the Waste Plan. The evidence base, which is currently being prepared, will provide an indication of the scope of any review, including the need for further safeguarding or potential for site release.

#### Utilities evidence base

- Emerging evidence by the Royal Docks Team exploring low carbon heat networks in the Royal Docks.
- Emerging infrastructure evidence as part of the Opportunity Area Planning Framework will set out the infrastructure requirements to support growth in the Royal Docks and Beckton including utilities.

#### Infrastructure Delivery Plan

- Identifies what infrastructure is required in what locations to support growth and deliver the Plan's objectives.
- It pulls together best-available information from a range of sources including TfL, the NHS, other external bodies and other Council departments.

### **Proposed policy changes:**

- 1. Update the policy and existing safeguarded waste sites to meet the new London Plan target. This will be informed through the updated Joint East London Waste Plan and associated evidence base. There is also scope within the policy text or justification to elaborate on design and management practices to secure Best Available Techniques (best practice) at new or existing waste management sites.
- 2. We will promote the circular economy in policy changes to support sustainable waste management in design and construction of new developments: We propose to amend the policy to require Circular Economy Statements as per the London Plan and emphasise the need to optimise local circular economy opportunities (for example, sourcing materials locally, working with local reuse and repair organisations). If evidence suggests additional infrastructure commitments are needed, we will explore ways the policy can support this.
- We want the design of new buildings to make it as easy as possible to recycle and reuse and keep different types of waste separate. Waste management should be considered at the outset of a development's design, reducing the need for future retrofitting in order to meet future changes in waste policy and collections. The policy will support innovative ways of encouraging waste reduction, reuse and recycling, including improving the safety and functionality of waste disposal locations and exploring ideas such as dedicated 'freecycle' rooms where residents can leave possessions they no longer need for others to use. The policy will also signpost relevant and emerging guidance for architects and developers.
- 4. Establish the future role of utilities in supporting a low carbon future of the Royal Docks, including the future of the District Heat Network. Revisit the role and future of the Heat Networks to better secure and deliver low carbon development. Explore other approaches and new cost effective technologies as requirements of new development to support sustainable and low carbon future
- 5. Prioritise delivery of energy capacity in areas of high growth: The Local Plan will need to consider how to address the power capacity issues in the Royal Docks and setting out the expectations, through policy and /or site allocations, to ensure there is electricity capacity to support level of growth.

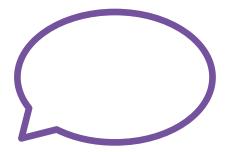
6. Prioritise the delivery of high speed broadband and other associated digital infrastructure, as part of inclusive growth for Newham. We will consider how planning policy can best support the delivery of inclusive digital infrastructure, working with network providers to ensure homes and business premises are sufficiently supported by digital infrastructure at the earliest stage and to avoid disruption to occupiers or retrofitting.





### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- Are there ways your home could be better designed to help you recycle or reuse more?
- How can planning support the delivery of inclusive digital infrastructure?
- How can we plan for a utilities network which contributes to addressing the climate emergency?
- Are there further mitigation measures in design terms to ensure utilities doesn't result in unacceptable impacts such as noise or smells?





# WE ARE SHAPING.



OUR PLAN.

#### Introduction

The Local Plan has a wide range of users, from professional planners (both within the Council and working for external organisations and developers) to businesses considering investments to residents interested in proposals for their neighbourhood and householders making planning applications.

We want to make sure the Local Plan is as easy to use as possible, providing clarity to all users on what the aspirations, objectives and policies are and what we require from applications in order to deliver and meet them.

### What you've told us

Feedback from regular users of our current Plan have said they like the following about the current Plan:

- Use of hyperlinks.
- The way the Local Plan is broken down into categories and then policies, which are colour coded.
- That each policy clearly states which other policy it relates to.
- Maps/diagrams and visual information.

However there were also a number of areas for improvement highlighted:

- Large paragraphs key points could be highlighted for improved clarity.
- Maps could be clearer with more street names and ability to zoom in.
- The document and policies are long and can be wordy and repetitive.
- Reducing the justifications under each of the policies would make it easier to navigate and more used.
- The Community Wealth Building document more effectively uses visuals to make an easy to read document.
- Bullet points rather than long sentences and long paragraphs would be clearer.

# What new trends and objectives to we want to address?

- The <u>London Plan 2021</u> has adopted a new policy numbering system, which is the same as our current Local Plan – this can make it confusing to quickly see which Plan is being referred to.
- National government has initiated a number of pilot projects to increase the use of mapping and digital
   Local Plans to improve ease of use. The White Paper
   on Planning 2020 stated 'Local Plans should be visual and map-based, standardised, based on the latest digital technology'.

### **Proposed policy changes**

- 1. Shorter topic related chapters. The current Plan has six policy chapters which include a range of topics. Some topics (like Town Centres) appear in more than one chapter. We propose to have more, shorter, topic related chapters so it is clearer which policies can be found where. The policy sections of this Issues and Options document has been laid out using our proposed chapter headings.
- 2. Simplify and shorten the policies. The current Plan has relatively few policies per topic, which cover a number of different aspects of each topic within one policy and can be very long. The policies are accompanied by justification text and implementation text. We propose to have shorter policies each focused on fewer aspects of the topic. This may result in more policies overall. We propose to remove the justification text from under each policy and have a single justification section for each topic. The implementation text will be more clearly linked to each part of the policy.
- Identify the spatial aspects of the policies more clearly. Currently each policy has a spatial section which describes where different policies apply. This can create duplication between policies and with the spatial. We propose to consider ways to make the balance and location of spatial guidance clearer. This could involve a separate spatial policy for each topic or adding more of the spatial guidance to spatial policies.

- 4. More images and more maps. The current Local Plan has no photos or diagrams. It does have a series of clear maps which are available as pdfs. We propose to include more images, including diagrams and photographs to provide clearer guidance and create a sense of Newham and our vision for the borough. We propose to introduce an interactive map which will allow users to choose which mapping layers to view and click on sites and buildings to know which policies apply there.
- 5. Adopt new unique numbering system and provide clear guidance on links between policies. The current Local Plan now has a similar numbering system to the new London Plan which can cause confusion. It provides clear guidance on how policies link to each other. We propose to adopt a unique numbering system to reduce confusion.





### You tell us

- Do you agree with the proposed changes?
- Are there other changes we should consider?
- Is there anything missing?
- Are there any planning documents you consider to be particularly easy to use?



