

# Newham Local Plan Refresh Regulation 18 Consultation Report



**WE ARE NEWHAM.**

**WE ARE SHAPING.**

The Local Plan is the key planning document the Council uses to assess planning applications and manage where regeneration and development will take place in Newham over the next 15 years.

**OUR LOCAL PLAN.**



Get involved in shaping the future of Newham together.

**Have your say before  
20 February 2023**

#NewhamLocalPlan



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January – February 2023

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## Executive Summary

This report aims to inform our stakeholders on the engagement process for the Regulation 18 Consultation, detailing who engaged with the consultation and outlining our responses to their feedback. The report comprises four main sections:

1. **Introduction:** Provides background information on the Local Plan Refresh process and the Regulation 18 consultation.
2. **Engagement Strategy:** Details the methods employed for engagement during the Regulation 18 consultation phase.
3. **Stakeholder Engagement Analysis:** Presents a breakdown of stakeholders who responded to the consultation, along with an analysis of engagement and equalities data.
4. **Response Summary:** Outlines responses to stakeholder feedback, categorized by chapters of the Local Plan and is followed by a summary of the young commissioner's workshop feedback.

### Key Findings:

- The methods used in this stage of consultation resulted in a total 325 representations being received. A representation represents a single submission by email, Co-Create, questionnaire or an in-person event where multiple people attended. An estimated 335 people attended in-person events in response to the Regulation 18 consultation. Some of these attendees may have also submitted additional representations, as they may have engaged using digital methods following the in-person events. From these representors and attendees, 8388 comments were received at this consultation stage.
- The demographic data analysis indicated an improvement in proportional representation across five of six measured demographic characteristics compared to the previous consultation.

## 1. Introduction

This report sets out the outcomes of the Newham Draft Local Plan (Regulation 18) consultation undertaken for the Newham Local Plan Refresh. The report summarises what we did in the consultation and engagement activities before reporting who responded. This includes an analysis of the representors, methods they used to respond, the chapters they commented on and their demographics.

The final chapter offers a summary of the comments received, detailing the Council's response to how these comments have informed changes to the Draft Local Plan. This is accompanied by a summary of Young Commissioners Workshop comments and our responses. The full set of comments received and the Council's responses to those comments is also provided in (see Appendix 7).

### Introduction to the Local Plan Refresh

- 1.1 The Local Plan serves as the primary planning document used by the Council to assess planning applications and manage areas for regeneration and development in Newham.
- 1.2 The current Local Plan, adopted in 2018, is currently being updated to meet the requirement for all Councils to maintain an up-to-date Local Plan. The updated Plan will guide development up to 2038, addressing the key challenges of delivering inclusive growth, supporting the Covid-19 recovery, and responding to the climate emergency.
- 1.3 The plan-making process commenced with the production of the Issues and Options document, with consultation taking place on it from 18<sup>th</sup> October to 17<sup>th</sup> December 2021. Further details about how this stage has informed the Draft Local Plan can be found in the [Issues and Options Consultation Report](#).
- 1.4 Subsequently, the Regulation 18 consultation took place between 9<sup>th</sup> January and 20<sup>th</sup> February 2023. The findings from this consultation, coupled with Local Plan evidence base research, have informed the Submission Draft Local Plan (Regulation 19), which will undergo consultation in summer 2024 (see Figure 1.1).

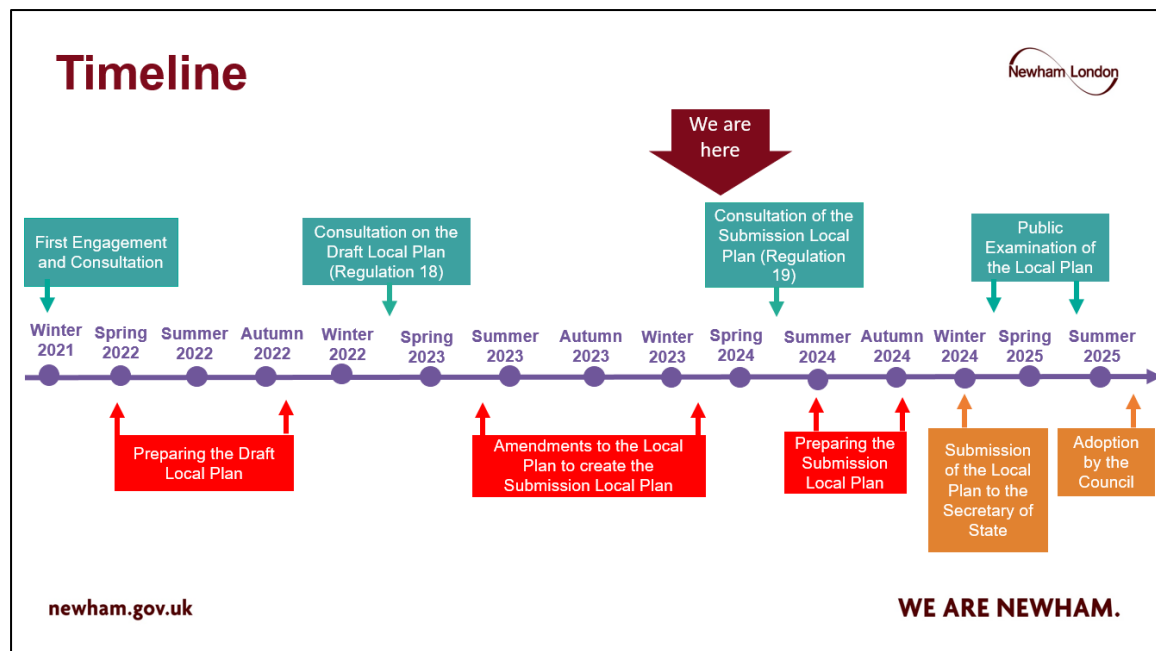


Figure 1.1 - Plan Making Process Timeline

## Introduction to the Regulation 18 Consultation

- 1.5 On 6<sup>th</sup> December 2022 Cabinet approved the Draft Local Plan for consultation. This was followed by a soft launch on the 16<sup>th</sup> December 2022, providing people the opportunity to review the Local Plan and leave comments prior to the six-week consultation period. The formal consultation took place between 9<sup>th</sup> January and 20<sup>th</sup> February 2023. This six-week consultation period meets Newham’s statutory requirements for a Local Plan consultation.
- 1.6 This was the first formal, statutory round of consultation, which aimed to invite stakeholders to comment on the detail of draft policies and provide feedback on what they would keep, change, or add to the policies. The approach to the consultation was informed by the Local Plan Refresh Engagement Strategy and met the Regulation 18 requirements, as well as the requirements of the Newham Statement of Community Involvement, published in October 2021.
- 1.7 The diverse range of stakeholders consulted included residents, statutory consultees, infrastructure providers, developers, community groups, neighbouring Local Authorities, landowners, business owners, elected officials, and Council staff. The variety of stakeholders, together with the array of engagement activities tailored to each of them, addressed equality considerations in line with the Equality Act 2010.

## 2. What we did - Consultation & Engagement activities

This section of the report provides a detailed overview of the methods used for consultation and engagement during the Draft Local Plan (Regulation 18) consultation.

### Overview

- 2.1 The Local Plan Engagement Strategy provided a framework for the methods of engagement with residents and other stakeholders during the Local Plan Refresh and specifically for the Regulation 18 consultation.
- 2.2 A variety of existing and innovative engagement methods were utilised throughout the consultation process. A primary aim of the engagement strategy was to apply methods that empowered participants with the skills and confidence to provide detailed feedback on policy wording within the Local Plan Review. This was achieved by informing residents on the Local Plan and why it is important, the plan-making process, and what can be achieved through planning and through engagement activity. Co-production methods were employed to review and amend the draft Plan. Additionally, the engagement strategy also aspired to make consultations more accessible and effective, creating a building block for future engagement.
- 2.3 Engagement activities were also developed in accordance with plan-making legislation, national planning policy, and the principles set out in the Newham Statement of Community Involvement. We employed methods to meet our statutory requirements such as issuing a public notice and making hard copies of the Local Plan available in libraries. Furthermore, we also employed innovative methods to enhance engagement from the previous consultation, including postcard drops and community events.
- 2.4 The engagement activities were divided into three categories, each of them with a different objective (see figure 2.1).

First, engagement was broadcast through emails, the Council's website, social media, press releases, a public notice, a promo video, public advertisement boards, internal communications, promotional postcards, site posters and Local Plan Summary factsheets.

After broadcasting the Regulation 18 consultation, the engagement process transitioned into listening to ideas and opinions, through a combination of online and hard copy questionnaires, Newham Co-Create, an online informative workshop, and written responses.

The final element of the engagement phase expanded on the listening phase to co-producing. This phase was undertaken through a series of drop-in sessions, community events, and Local Plan community assemblies.



Figure 2.1: Engagement Activities

## Equalities & Accessibility

2.5 The methods outlined above (see Figure 2.1) were tailored to address any equalities considerations in accordance with the Equality Act 2010. Various measures, such as adopting a consistent approach to engagement and finding alternatives for potentially digitally excluded stakeholders have been implemented throughout the consultation.

2.6 During the broadcasting stage, we used the press release, public advertising boards, postcards, and site posters to inform those who are digitally excluded about the upcoming consultation and how to respond. During the listening stage, hard copies of the questionnaire and Local Plan were made available at libraries and could be ordered for home delivery if residents were unable to attend in-person due to shielding. Additionally, written responses allowed those digitally excluded to submit a response via mail, enabling those without digital access or a lack of mobility to engage with the Local Plan. Finally, during the co-producing and exploring stage, drop-in sessions and community assemblies allowed for in-person co-production. This ensured that engagement and consultation was carried out in an equitable and accessible way, providing opportunities for all to participate.

2.7 Promotional postcards were sent to postcodes with a higher percentage of underrepresented groups during the Issues and Options stage, additionally translated text was added to postcards, referring residents to the online portal where they could use digital translation tools. Another method was specialised youth workshop involving the young commissioners to engage young residents. Furthermore, community groups were emailed to offer a bespoke tailored presentation to address issues of interest in the plan.

## Duty to Cooperate

2.8 Engagement with Duty to Cooperate bodies has been on-going throughout the Local Plan Review. Further information can be found in the Duty to Cooperate Report, and the responses from Duty to Cooperate bodies, along with our response to them, can be found in Chapter 4.

## How we Engaged

### 2.9 Broadcasting

#### *2.9.1 Emails*

The use of email distribution lists was to notify a wide range of stakeholders about the consultation. It provided information about the various ways to submit responses as well as information about the consultation events. This was the primary method of reaching our statutory consultees on the Draft Local Plan.

Three rounds of emails sent to the Planning Policy Consultation database. An email was sent during the soft launch period, followed by another email on the first day of the consultation (See Appendix 1). Reminder emails were sent during the final week of the engagement period.

Although the emails sent to the Planning Policy database reached 1,388 subscribers, the actual outreach was much higher. This was due to various teams across the Council and local organisations forwarding our emails to their subscribers on behalf of the Planning Policy team, as well as those registered on Newham Co-Create.

The organisations and stakeholders that assisted in sending out the email to their respective lists is provided below:

- Newham Planning Policy Database
- Newham Co-Create
- London Legacy Development Corporation Planning Database
- Community Neighbourhoods
- Royal Docks team
- Newham Staff via Newham News
- Mayor's Resident Bulletin
- Public Health and Covid-19 Champions
- Community Assembly Steering Groups
- Citizen's Assemblies
- Compost
- Inter-faith Forum
- Older People's Reference Group
- Ageing Well Residents' Group
- Faith Group
- Newham United Dialogue
- Businesses Newsletters



- Newham Events

Officers within the LBN Planning Department included a message about the consultation in their email signatures those already engaged with the planning system, such as developers and landowners.

### 2.9.2 Council Website

The Draft Local Plan was published on the [Council's website](#) at the start of the soft launch period (see Figure 2.1), on the Newham Local Plan Review webpage. The evidence base and the Integrated Impact Assessment were also published on the Local Plan Review webpage.

The Local Plan Review webpages not only provided a list of ways to submit responses but also provided a significant amount of information about plan-making and the Local Plan Refresh process, aiming to expand residents' planning knowledge. This content included the promotional video.

Additionally, the website provided a link to Newham Co-Create, helping to connect stakeholders who frequent the website to Co-Create, including developers, landowners and residents.

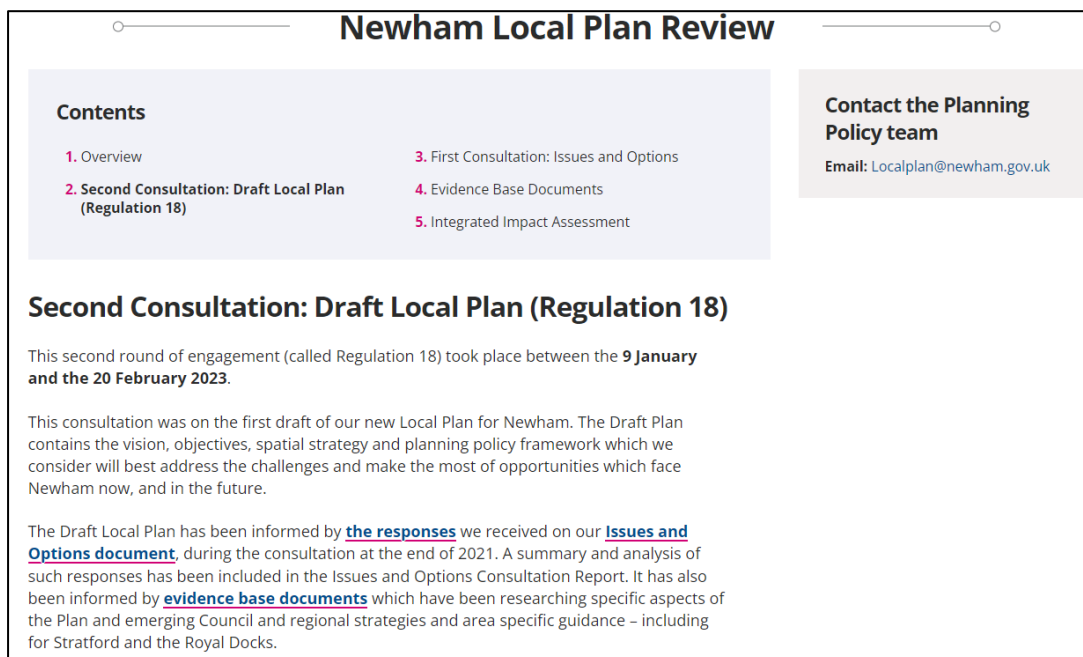
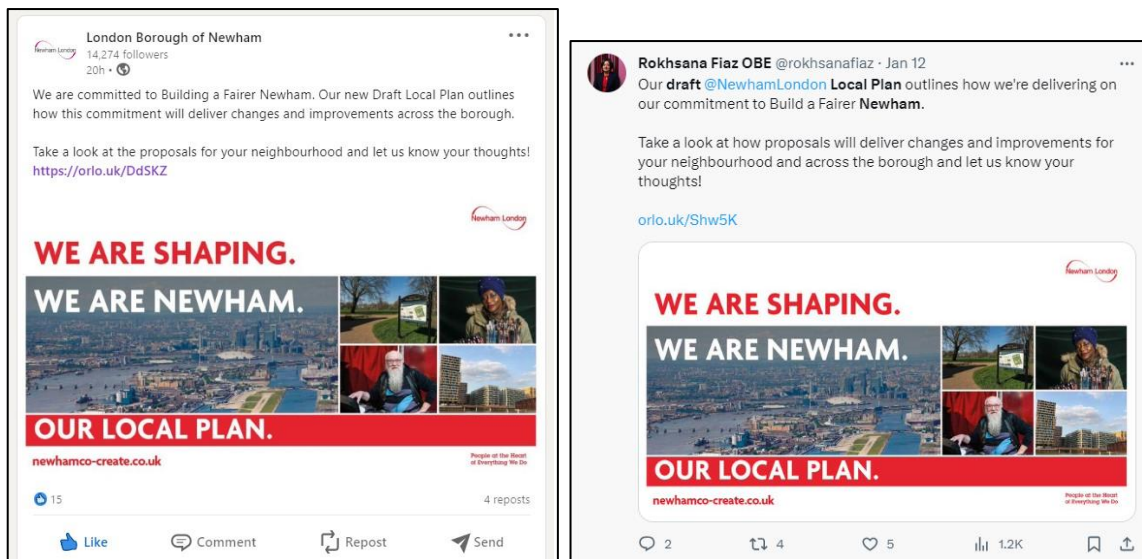


Figure 2.1 – Council Webpage

### 2.9.3 Social Media

The platforms Facebook, Instagram, X (twitter) and LinkedIn were used to broadcast the consultation (see Figure 2.2) and to invite people to attend our Community Assemblies, online informative workshop and drop-in session. Some of posts on these platforms

contained important information regarding each planning theme, ensuring stakeholders were well-informed on the focus of this consultation. Other posts focused on aspects of the plan which may have been of particular interest to various residents, helping to highlight the role and importance of the Local Plan and prompt interest in responding.



Figures 2.2 - LinkedIn post from LBN and 2.3 - Twitter posts by the Mayor

Some posts were re-shared on Councillors' social media accounts, in the Youth Zones' Instagram account, as well as the Mayor of Newham's account (See Figure 2.3).

Across our paid social media posts we generated 203,650 impressions (views of a post), 501 clicks (clicks on post taking you to our website), at a Click through Rate (CTR) of 0.25% (clicks as a percentage of total impressions).

#### 2.9.4 Press Release

Press releases were sent to the [Newham Recorder](#) and published on the 8<sup>th</sup> of February 2023 (see Appendix 2), aiming to reach digitally excluded residents or those without access to social media. This approach ensured a balance between digital and print media channels and aimed to encourage readers to provide feedback on the draft Local Plan.

An article about the Local Plan was also included in the Newham Mag, which is delivered to every household in Newham (see Appendix 3).

#### 2.9.5 Public Notice

A public notice was published in the Newham Recorder at the beginning of the engagement period, outlining the consultation dates and the various methods use to provide comments (see Appendix 4).

### 2.9.6 Promo Video

For the Regulation 18 Consultation promo video, the Issues and Options consultation video was updated to explain the purpose of the Regulation 18 consultation. It was released during the consultation period on 8<sup>th</sup> February 2023, effectively contributing to various engagement methods as it could be published across social media, the Council’s website, Co-Create and YouTube.

See the video here: [What does the Local Plan do](#)

### 2.9.7 Public Advertisement Boards

Public advertisements were displayed on JC Decaux boards in public spaces across the borough, including the Westfield Centre, with a variety of 8 different posters, one for each Community Neighbourhood Area, across 33 boards. These posters provided a summary of with main policy changes related to that area (see Figures 2.4). The graphics were designed in line with the Council’s branding guidelines and included a QR code that directed people to Co-Create. Additionally, smaller posters were placed in library bulletin boards. This aimed to reach people living and working in Newham, reaching them as they went about their daily activities.



Figures 2.4 - Public advertisement board in East Ham

### 2.9.8 Internal Communications

Internal communications were used to inform the Council staff about the Regulation 18 consultation. Promotional materials were added to Newham News and the Intranet, including an email template and the promo video, which were shared with Council staff. This method informed Council staff about the consultation and encouraged them to respond as key stakeholders, as well as to share the details with residents and other stakeholders they work with.

#### *2.9.9 Postcard Drops*

Promotional postcards were delivered to a sample of Newham's population, providing residents with a prompt and guide on how to approach the Draft Local Plan document and provide feedback. A total of 40,000 postcards were ordered and delivered to a sample of Newham's population as well as being made available in libraries and handed out at events. The selection of this sample was based on the analysis of demographic data from the Census in Newham and via postcode, aiming to address any demographic and geographic gaps identified in the previous round of engagement.

The postcards included the details of the online informative session, Local Plan Assemblies, drop-in session, a QR code to access Co-Create, and the contact information to respond to the Planning Policy Team. Information on how to access co-create was translated into Arabic, Bangla, Romanian, Tamil and Urdu (see Appendix 5).

#### *2.9.10 Site Posters*

Site posters aimed to make residents aware of the specific sites included in the Draft Local Plan as site allocations, and encourage them to provide feedback on the proposals for these sites. Each poster included a site map, a summary of the site allocation including development principles, design principles and infrastructure requirements for the site. The posters also featured a QR code linking to Co-Create (see Figure 2.5), enabling respondents to submit feedback on the site proposals.

A total of 118 A3 posters were strategically placed near the proposed 44 site allocations in the Local Plan, with a range of 2 to 4 posters per site, reflecting access routes to the site.



Figure 2.5 – Stratford Central Site Poster beside site location

### 2.9.11 Factsheets

Factsheet were created for each of the key themes of the Draft Local Plan, offering residents a simplified summary of the main policies in the plan (see Figure 2.6). They included concise summaries of the Issues and Options consultation feedback, the evidence findings and the resulting Draft Local Plan proposals. The factsheets were made available on the [Council's website](#), Co-Create and at in-person events.



**WE ARE SHAPING. NEWHAM DRAFT LOCAL PLAN. WE ARE NEWHAM.**



## YOU SAID, WE DID: HIGH STREETS

During our Issues and Options engagement in 2021, you said	Our evidence says	The Plan proposes
<ul style="list-style-type: none"> <li>• Increase the variety of shops and facilities on Newham's high streets.</li> <li>• The 15 minute neighbourhood concept should be carefully applied so that it does not result in less access to day-to-day goods and services.</li> <li>• A proactive approach should be taken toward enabling and managing the visitor, evening and night-time economy.</li> <li>• There are still too many betting shops and hot food takeaways, which needs to be addressed.</li> <li>• The public realm needs to be more attractive and enable social interaction and community development. Need more alfresco spaces and street markets.</li> </ul>	<ul style="list-style-type: none"> <li>• Newham's existing Town and Local Centres are serving local needs well, have lower vacancies than national average and are evolving in line with national trends.</li> <li>• There is a need to balance opportunities for increasing variety in our centres with the need to promote and protect retail and leisure in Primary Shopping Areas.</li> <li>• There are more parts of established high streets that could be protected. Alongside delivery of new Local Centres, these will help to address gaps in access to groceries and services in the existing protected network.</li> <li>• With the exception of Stratford, the visitor evening and night-time economy is not well established in Newham's centres and many residents travel out of the borough to access leisure and culture activities.</li> <li>• Markets make a significant contribution to the success of Newham's centres.</li> <li>• Two-thirds of adults and 43% of children in Year 6 are carrying excess weight. 1 in 3 children have tooth decay.</li> </ul>	<ul style="list-style-type: none"> <li>• To promote shops, cafes and restaurants, services, offices and workspaces within the Primary Shopping Areas of Town and Local Centres.</li> <li>• To support meanwhile uses, pop-ups/events and the multi-functional operation of buildings, promote affordable small commercial units, enhance and activate public realm, and protect existing markets and support the creation of new ones.</li> <li>• A new requirement for every home to be within 400m of a designated shopping area, or within 15min walking distance of at least two shopping areas. New Local Centre and Neighbourhood Parade designations to address gaps and further protect well-functioning high street frontages.</li> <li>• Support for the retention of established corner grocery shops in areas which are further away from protected shopping areas.</li> <li>• To promote evening and night-time uses in suitable locations, with the highest concentration allowed in the largest town centres.</li> <li>• Tightening of the concentration criteria for hot food takeaway and all types of gambling premises. Healthy eating catering standards promoted for all food-based businesses, and marketing standards to promote responsible operation of pawn shops, pay day loan shops and gambling premises (where no over-concentration).</li> </ul>




Figure 2.6 – High Streets factsheet published on the website

## 2.10 Listening

### 2.10.1 Online Informative Workshop

The online informative workshop was held on 16<sup>th</sup> January 2023. This engagement method provided an informative session introducing the Local Plan, why it is important, and outlining what can be achieved through planning. The workshop further explained the structure and main policy changes to the Draft Local Plan, while guiding participants on how to engage and provide comments (see Figure 2.7). The session concluded with a Q&A session with the Chief Planning Officer.

For convenience of those unable to attend, the session was recorded and uploaded to Co-Create and the Council's website.



**NEWHAM'S DRAFT LOCAL PLAN:  
INPUTS TO DATE**

**Issues and Options Consultation**

October to December 2022

- 9 pop-up stalls across the borough and 1 youth pop-up stall.
- 8 Community specific events (attended on invitation from the group).
- 2 online workshops.
- 7 themed co-production workshops and 1 co-production workshop for young people

386 representations  
5,207 comments  
74% residents

Consultation Report available on our website

**Evidence Base**

- Characterisation Study 2022
- Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Assessment 2022
- Retail and Leisure Assessment 2022
- Employment Land Review 2022
- Climate Change Evidence Base 2022
- Community Facilities Needs Assessment 2022
- Waste Plan Evidence Base 2022
- Site Allocation and Housing Trajectory Methodology 2022
- Built Leisure Needs Assessment
- Green and Blue Infrastructure Study
- Playing Pitch Strategy
- Sustainable Transport Study
- Water and Flood Risk Studies

All reports available on our website

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**BUILDING A FAIRER NEWHAM**

Figure 2.7 – Online informative workshop

### 2.10.2 Co-create

The Co-Create online platform provided an online space for people to submit consultation responses in multiple ways and centralised digital engagement within a single platform.

The Co-create webpage for the Regulation 18 consultation had several key resources including: the promotional video, factsheets on each of the key themes of the Draft Local Plan, the Typeform questionnaire to provide feedback on the policy proposals, and the dates and registration details of the Regulation 18 consultation events.

The Co-Create webpage included an interactive pdf reader (Konveio) to host the Draft Local Plan (see Figure 2.8), allowing users to provide comments in-situ directly onto the part of the plan they wanted to comment on. Konveio also featured a summary of the Draft Local Plan highlighting its key themes.

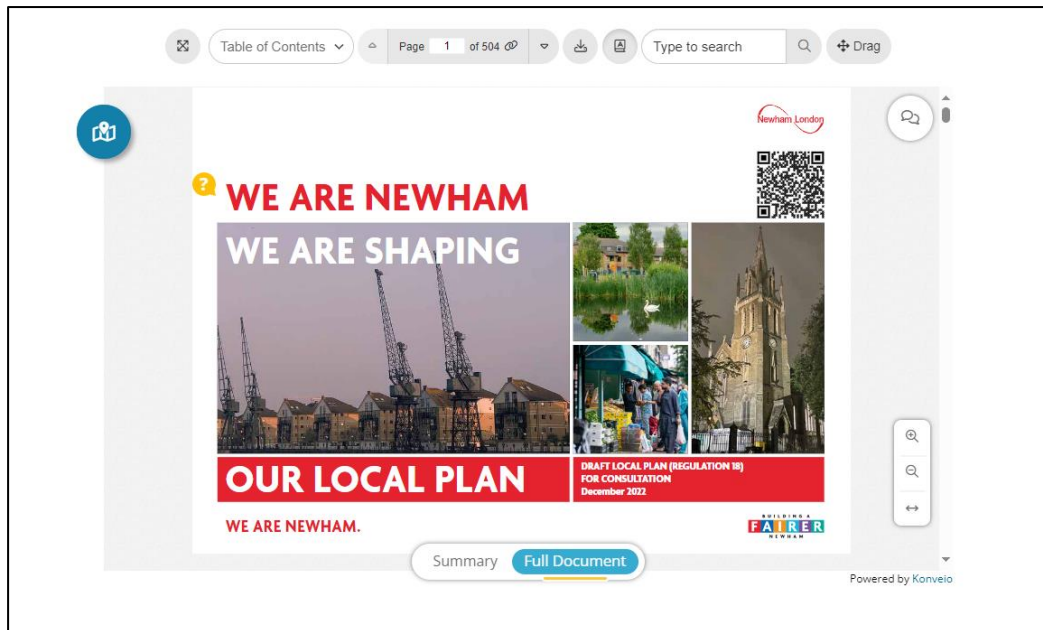


Figure 2.8 – Konveio Draft Local Plan

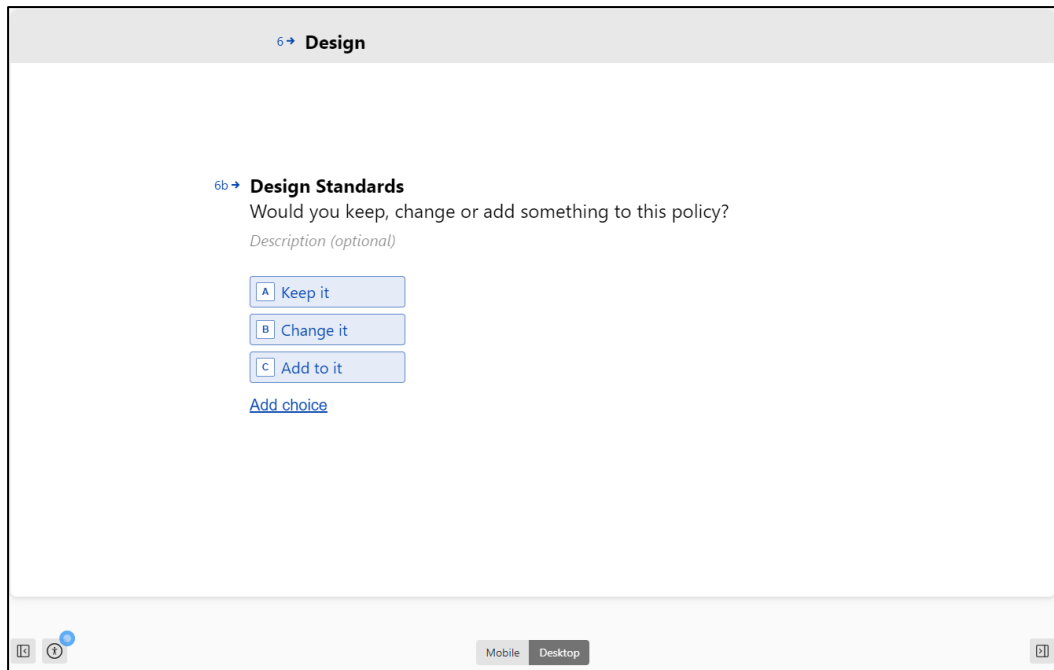
### 2.10.3 Questionnaire

The questionnaire provided a structured way for stakeholders to comment on the Local Plan. The first section included questions on the different Local Plan chapters and policies, asking stakeholders to provide comments on what to keep or change on the policy and whether anything should be added to the policy (see Figure 2.9). Following this, an open question provided an opportunity to share any other feedback stakeholders had about the policy and the plan as a whole. The final section of the questionnaire included an optional demographic survey to better understand who responded to the consultation.

Digital access to the questionnaire was facilitated through Co-Create using the survey software Typeform, allowing residents to conveniently submit their responses. Hard copies were also made available in local libraries along with hard copies of the Draft Local Plan.

To ensure inclusivity, residents with limited mobility or the need to shield were able to order a physical copy of the Draft Local Plan with the questionnaire, to ensure nobody was excluded from participating.





6 → Design

6b → **Design Standards**

Would you keep, change or add something to this policy?

*Description (optional)*

A Keep it

B Change it

C Add to it

[Add choice](#)

Mobile Desktop

Figure 2.9 – Questionnaire

#### 2.10.4 Written responses

This method provided a conventional method of written response, stakeholders had the flexibility to respond by emailing to the Newham Local Plan inbox, responding to the digital version of the Local Plan found on the Council’s website or via Co-create.

Stakeholders could also use a hard copy of the Local Plan, which included the contact information of the Planning policy team at our events in libraries or send comments in the post. This option catered to those who are digitally excluded, ensuring broader engagement with the consultation. This information was also shared on Co-create, the Council’s website, postcards and notification emails.

#### 2.10.5 Hard copies of the Draft Local Plan

Hard copies of the Draft Local Plan were located in all local libraries. Additionally, residents with limited mobility or the need to shield were able request the delivery of the Draft Local Plan, ensuring nobody in the Borough was excluded from engaging in the consultation.

### 2.11 Co-Developing & Exploring

#### 2.11.1 Drop-in Session

A drop-in session took place on Saturday 28<sup>th</sup> January 2023, from 11:00-13:00 at East Ham Library providing an opportunity for engagement with residents and local groups.

During this session, residents could pose queries to the Planning Policy Team regarding the Draft Local Plan and provide feedback on all aspects of the Plan. Factsheets were provided at the event and made available on the Council Website. Residents were able to leave written comments, examine maps and graphics developed as part of the Local Plan’s evidence base. Prompt questions were used by the team to help facilitate discussions and gather feedback (see Figure 2.10).



Figure 2.10 – Drop in session photos

### 2.11.2 Community Events

This engagement method aimed to enhance participation from residents who had not been reached in previous rounds of consultation. We identified representatives of communities who were underrepresented in the previous round of consultation and community representatives that have relevance to specific policies.

A total of 245 relevant groups were identified and sent personalised emails containing links to the ‘you said, we did’ factsheets, a guide on how to respond, and an invitation from the Planning Policy team to attend their local meetings to discuss proposed policies. This approach sought to tailor engagement efforts to specific community needs and foster meaningful discussions on proposed policies.

Despite reaching out to 245 relevant groups we saw little uptake in response, resulting in two meetings with relevant groups. We held one meeting with the homelessness forum, with an estimated 20 people in attendance, and another with Shelter, where approximately 12 people attended.

### 2.11.3 Local Plan Community Assemblies

This engagement method aligned with the Mayor’s manifesto commitment to use Community Assemblies for Local Plan engagement on the neighbourhood policies, creating an informal space for policy discussion and feedback. A series of Local Plan Community Assemblies were arranged, working collaboratively with the Community Neighbourhood teams and the People Powered Places team.

The neighbourhood policies and site allocations were presented to the 8 Community Assemblies for open discussions between the 19<sup>th</sup> January and 9<sup>th</sup> February 2023, with an estimated total of 231 attendees in-person and online. The specific dates, time, venue and location are detailed below (see Table 2). Each Local Plan Assembly focussed on different geographically-relevant groupings of Local Plan neighbourhoods.

Location	Venue	Date	Time
Beckton & Royal Docks	Royal Docks Learning & Activity Centre	31/01/2023	17:30 – 20:30
Canning Town & Custom House	Custom House & Canning Town Neighbourhood Centre	24/01/2023	17:00 – 20:30
East Ham	East Ham Library	09/02/2023	17:00 – 20:00
Forest Gate & Maryland	Forest Gate Learning Zone	19/01/2023	17:00 – 20:30
Green Street	Katherine Road Community Centre	06/02/2023	17:00 – 20:00
Manor Park & Little Illford	Jack Cornwell Community Centre	26/01/2023	17:00 – 20:00
Plaistow	Plaistow Library	02/02/2023	17:00 – 20:00
Stratford	Hopkins Room, Stratford Library	08/02/2023	17:30 – 21:00

Table 2: Showing locations and dates of Local Plan Assemblies

These sessions commenced with a presentation to explain to residents what the Local Plan is, why it is important, and what is achievable through planning. This was followed by an explanation of the timeline of the plan making process, and a question and answer session.

Following this, there were a series of activities facilitated by council officers with the purpose of encouraging residents to provide feedback on the strengths, challenges and opportunities for development and growth in their neighbourhood and the sites within them.

Each Assembly was a hybrid event, with the in-person event streamed so online attendees could watch the presentation and participate in the Q&A. The activities were then facilitated

online by a Council officer, using Jamboards (see Figure 2.16). Residents were asked at the beginning of the session which neighbourhood they were most interested and were directed to the right table or Jamboard to cover that neighbourhood.

Two activities facilitated the feedback. The first involved residents reviewing the relevant neighbourhood boundary, vision and policy, discussing what they would like to keep, change or add, with residents using post it notes to provide their responses (see Figure 2.12).

The second activity entailed residents reviewing neighbourhood profiles and site allocation summary posters, offering feedback what they would keep, change and add to the neighbourhood profile and site allocations. Residents added their feedback to the posters using post-it notes, as illustrated in (see Figure 2.15).

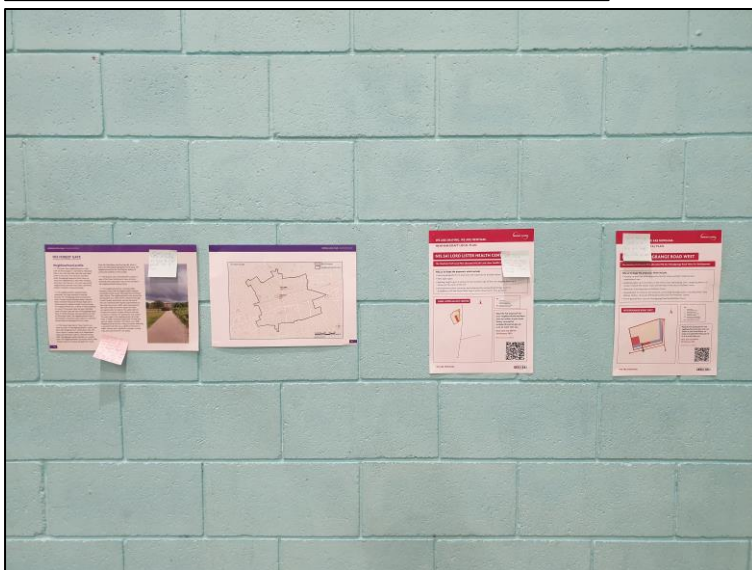


Figure 2.11 Plaistow Community Assembly & 2.12 Plaistow neighbourhood policy posters and comments





Figure 2.13 Plaistow Community Assembly



Figure 2.14 Stratford Community Assembly & neighbourhood policy posters and comments

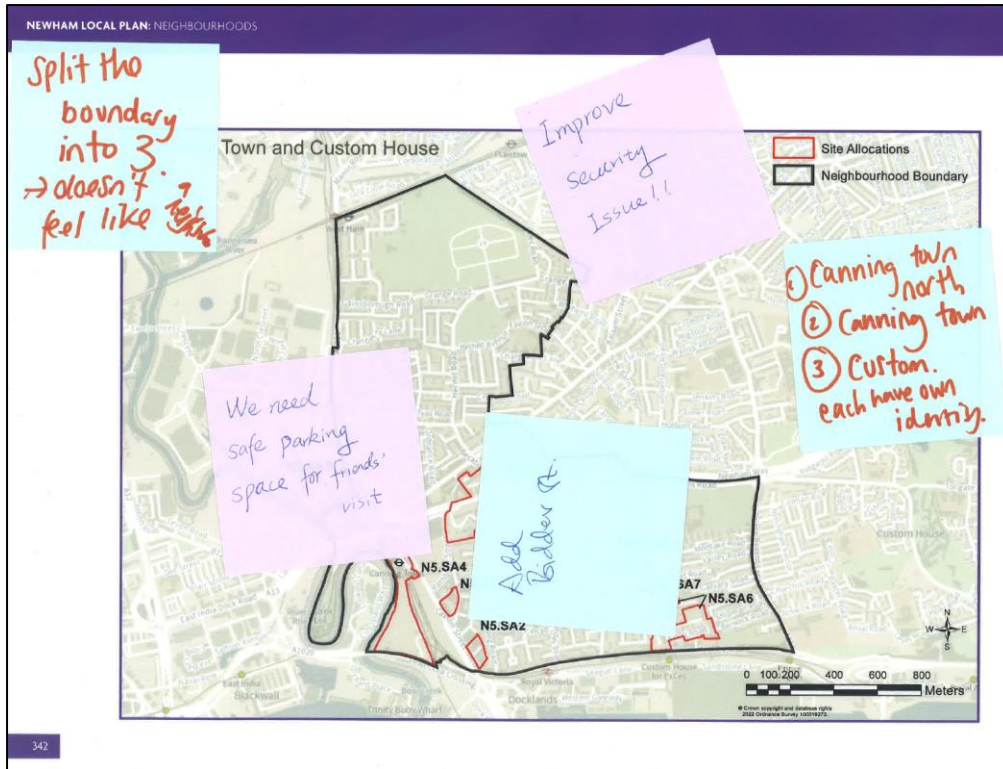


Figure 2.15 – Canning Town and Custom House Assembly Comments

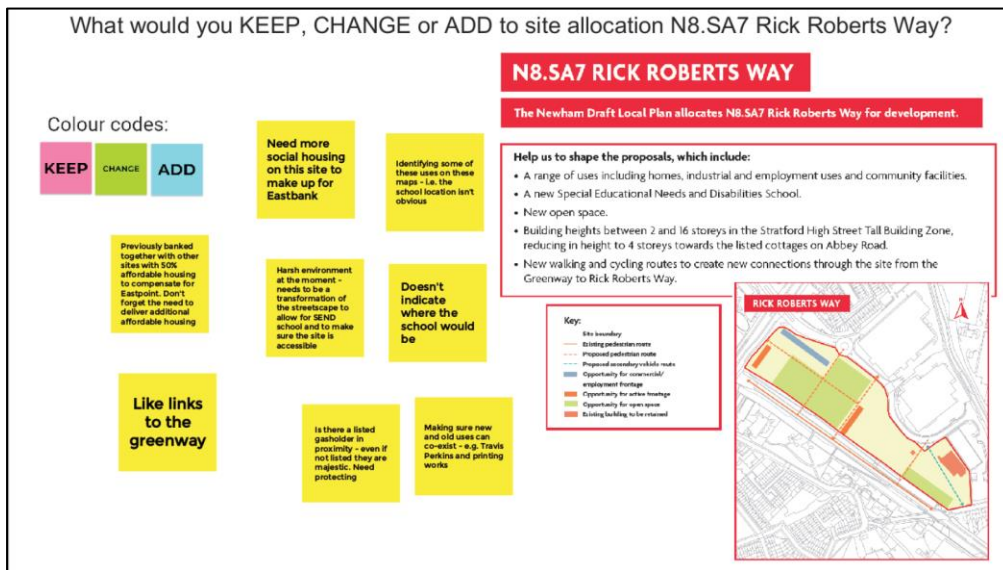


Figure 2.16 – N8.SA7 Rick Roberts Way jamboard from the Stratford and Maryland Community Assembly

### 3. Who Responded

This chapter aims to provide a breakdown of respondents, identifying successfully engaged stakeholders during the Draft Local Plan Regulation 18 consultation and highlighting areas that require further focus in the next round of consultation.

A total of 325 representations were received, and an estimated 335 people attended in-person events in response to the Regulation 18 consultation. Some of these attendees may also be representors, as they may have engaged using digital methods following the in-person events. Of these 325 representations, a total of 8388 comments were generated.

It is crucial to note the distinction between a representors, attendees, representations and comments. A representor refers to a stakeholder who has submitted a representation. A representation represents a single submission, or an in-person event where multiple people attended. This distinction is made because attendees at some of the in-person events were not asked to identify themselves when they made comments, so it was not possible to ascertain which attendees contributed. Consequently, analysing the attendees for the in-person methods provides a more accurate representation of engagement levels with each method. Comments represent each piece of feedback left by representors and attendees, who were able to leave multiple comments.

It is also important to acknowledge that providing information through any of the methods and in response to any of the questions was optional. Consequently, not all representors responded on all aspects of the plan and providing the equalities data was also voluntary so we do not have complete data on all representors.

#### 3.1 Representors

A breakdown of representations according to representors (see Figure 3.1). Residents are the most prevalent representor group, constituting 56.7% of representations. Following closely were Developers at 17.5%, Other<sup>1</sup> at 8.9% and Community group rep at 8.3%. For the full list of representors (see Appendix 6). The data showed an increase in developer engagement at the Regulation 18 stage compared to the Issues and Options stage, where developers made up only 4% of representors. This increased engagement was to be expected as this was the first statutory stage of consultation, providing stakeholders with the first opportunity to respond to draft policies.

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<sup>1</sup> The category 'Other' is used for representors that did not provide any information regarding their stakeholder role when submitting a response.

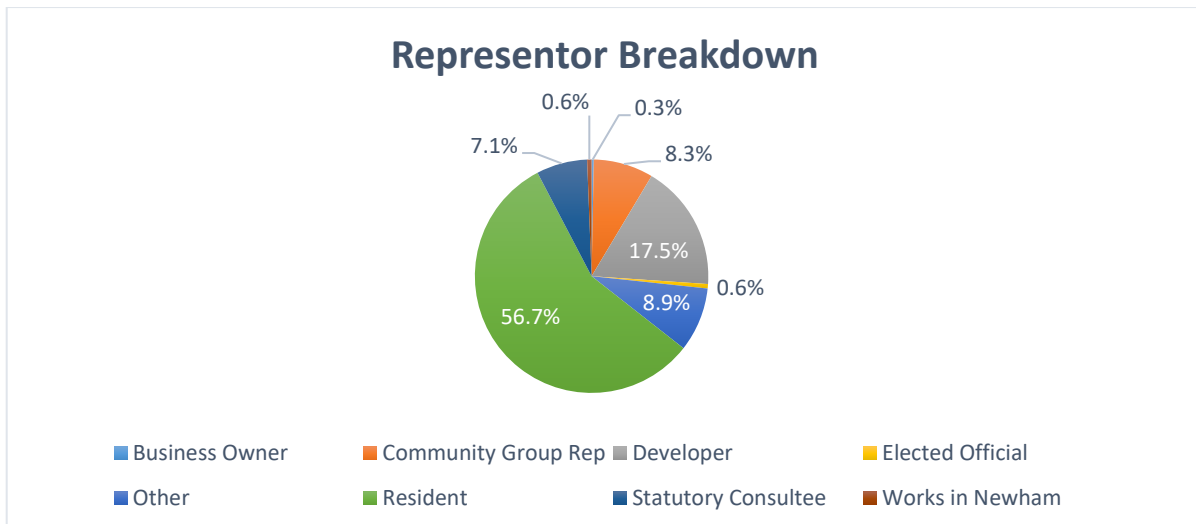


Figure 3.1 – Representer Breakdown

## 3.2 Methods

The digital and in-person methods of engagement have been analysed separately, considering representations for digital methods and attendees for in-person methods, as each in-person event only counted as one representation. The most popular digital method was email, generating the most representers. The most popular in-person method was community assemblies, bringing in the most attendees. Although this was expected as we held 8 community assemblies, and just 1 drop-in session, 1 young commissioner workshop and 2 stakeholder meetings.

### 3.2.1 Breakdown of representations by digital methods

The chart below (see Figure 3.2) illustrates the breakdown of representations by digital methods of engagement. Email returned the highest number of representations, accounting for 46%, followed by the questionnaire at 37%, and Co-Create at 17%. Compared to the Issues and Options stage, where the questionnaire only made up 20% and email constituted 31% of representations, while Co-Create contained 49% of representations, this consultation we saw a shift towards more email and questionnaire representations and away from Co-Create.



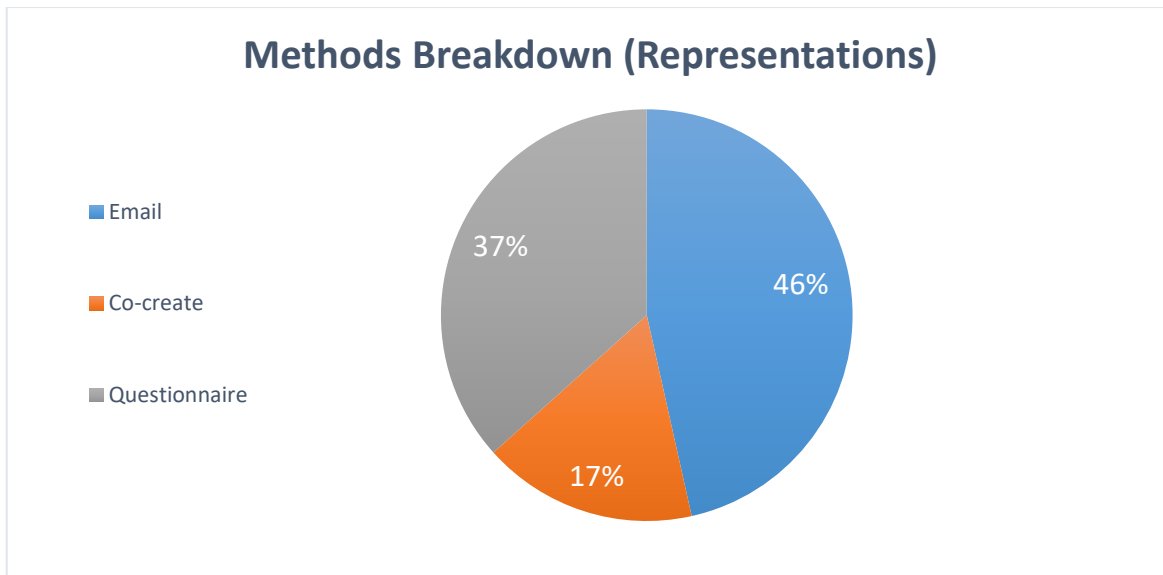


Figure 3.2 – Methods Breakdown (Representations)

Analysing the method of engagement by representor type (see Figure 3.3) revealed variations in the preferred engagement methods among different representor types. Residents were more likely to use the questionnaire, with 51.4% opting for this method. In contrast, developers and statutory consultants more commonly used email to respond, with 84.2% of developers and 91.3% of statutory consultants choosing for this method.

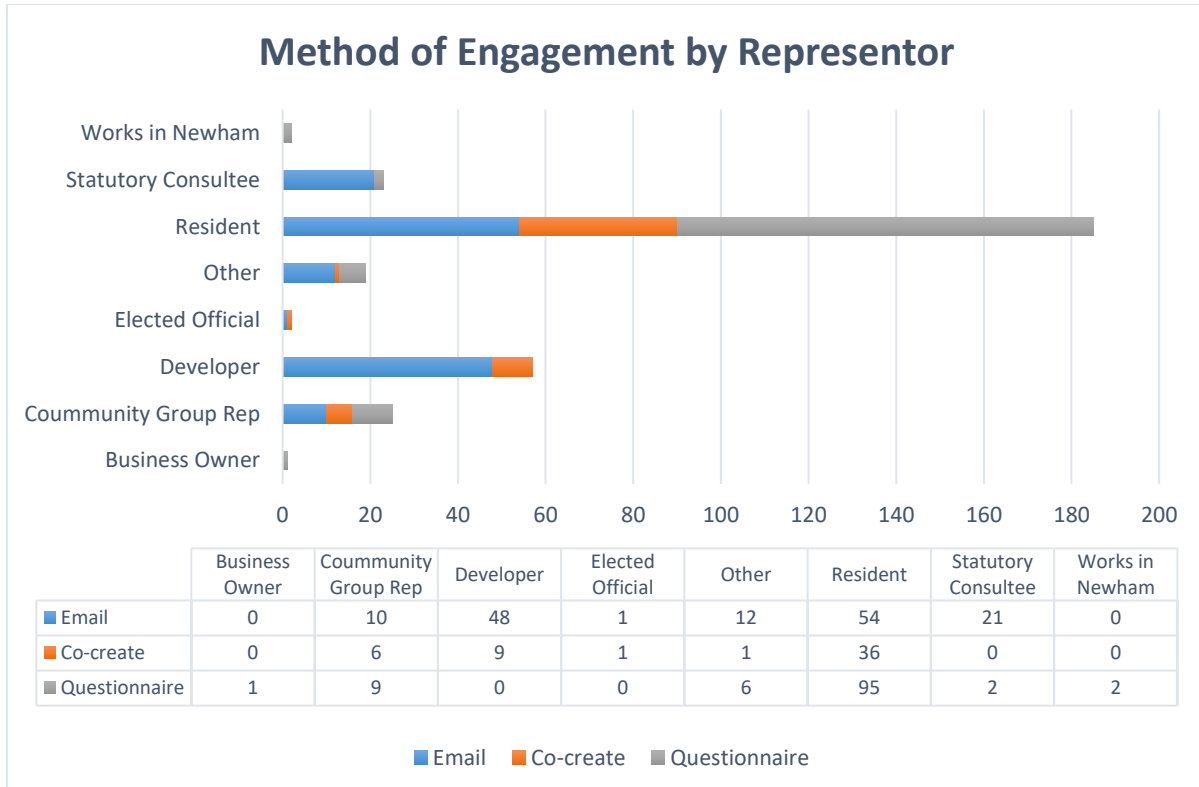


Figure 3.3 – Method of engagement according to representor

### 3.2.2 Breakdown of attendees of in-person events

The chart below (see Figure 3.4) displays the breakdown of attendees for different in-person methods of engagement. The data shows that Local Plan Assemblies were the most common in-person method of engagement, with 69% of attendees, followed by the Drop-in session with 15% and Stakeholder meetings with 12% of attendees. Local Plan Assemblies attracted more attendees than representatives, signifying its significance in generating engagement. While we cannot determine how many of the individual attendees contributed by providing individual comments during the assemblies, these sessions demonstrated good levels of engagement, making this method significant alongside email and the questionnaire.

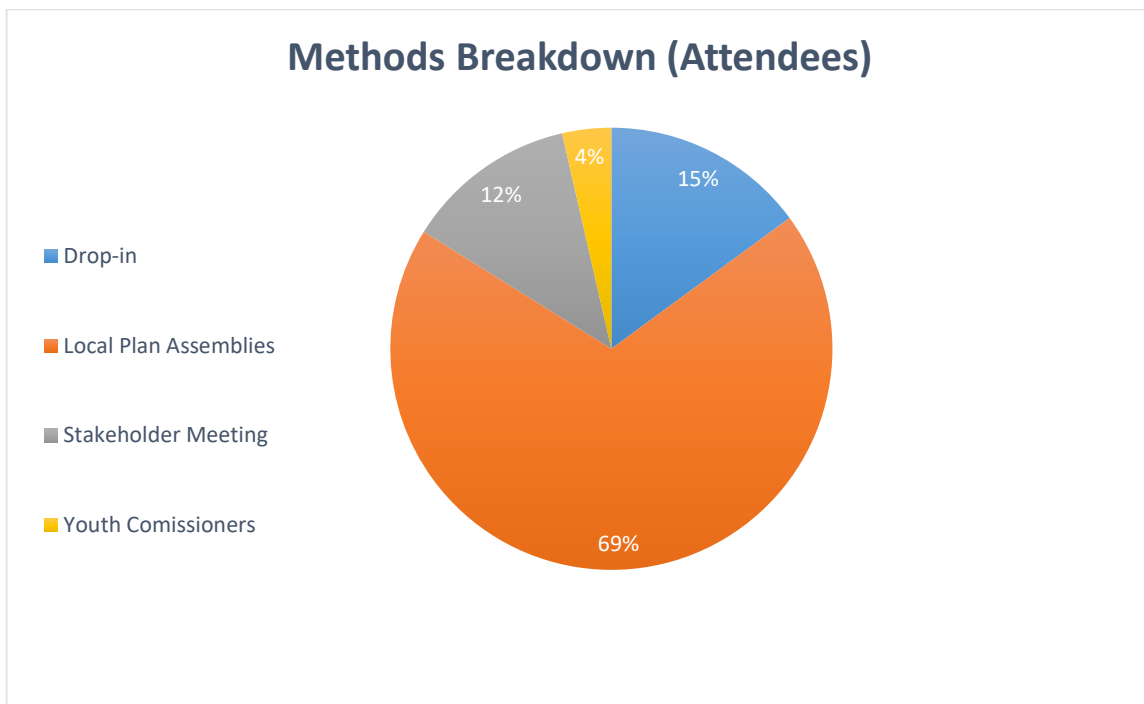


Figure 3.4 – Methods Breakdown (Attendees)

### 3.2.3 Breakdown of comments for all methods

The analysis of the comments (see Figure 3.5) found email to be most effective engagement method in terms of generating comments, accounting for 56.5% of the comments. This was then followed by the questionnaire and Local Plan Assemblies which accounted for 18.9% and 18.2% of comments, respectively. The remaining 6.4% of comments came from Co-create and Drop-in sessions.

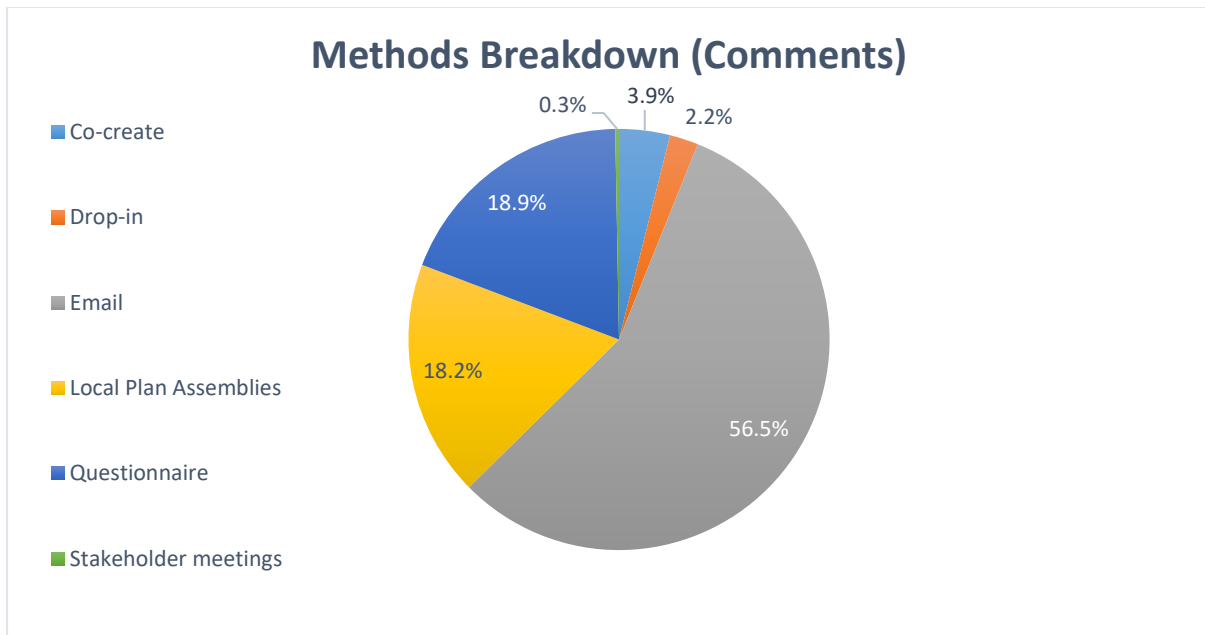


Figure 3.5 – Methods Breakdown (Comments)

### 3.3 Themes

In the process of collating the 325 representations, we broke down the representations into comments and categorised these comments according to the chapters of the Draft Local Plan. Comments made that had no direct policy link were collated into the General theme, which included general introductory remarks made by representors.

Our analysis of the comments data (see Figure 3.6) revealed Neighbourhoods to be the policy theme which elicited the most responses, with 3353 comments, followed by Green and Water Spaces with 1002 comments and Design with 689 comments.

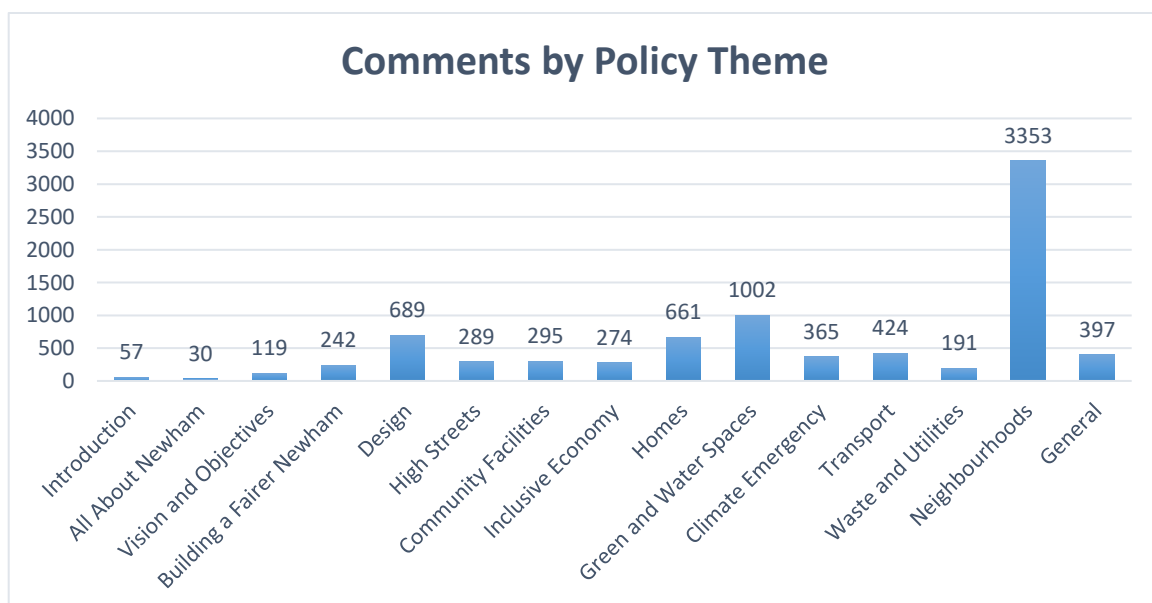


Figure 3.6 – Comments according to policy theme

### 3.4 Demographics

The following charts (see Figures 3.7, 3.8, 3.9, 3.10, 3.11, 3.12 & 3.13) illustrate the demographic analysis of the respondents according to their ethnicity, employment status, sexuality, faith, age, gender and disability. It is important to note we do not collect data for all of the protected characteristics, as some not relevant for peoples' engagement in the consultation.

Out of the total 325 representors and an estimated 335 attendees of the in-person events, only 168 provided some level of demographic information, as it was not a mandatory requirement. Therefore, the findings cannot be deemed fully representative of all representors.

Efforts were made to close the representation gap from the previous consultations, leading to improvements in the representation of groups who were underrepresented in the previous consultation. The analysis below will detail where these improvements were made. Despite these improvements, the findings from the regulation 18 consultation have pinpointed disparities between the characteristics of respondents and the population of Newham, according to the Census data 2021. This information will guide improvements in the next round of consultation, aiming for a more representative demographic profile.

### 3.4.1 Ethnicity

The analysis of the demographic data has identified gaps in the ethnicities of representors in comparison with Newham’s population. The data indicated that Asian residents, constituting 42.2% of the population, only accounted for 20% of respondents. Similarly, Black residents, making up 17.5% of population, comprised only 11% of respondents. Conversely, white residents were overrepresented, accounting for 58% of respondents despite representing just 30.8% of the population. However, despite these disparities, there was an improvement from the previous stage of consultation. At the Issues and Options consultation stage, Asian residents represented just 18.2% respondents, and Black residents only accounted for 13.64%.

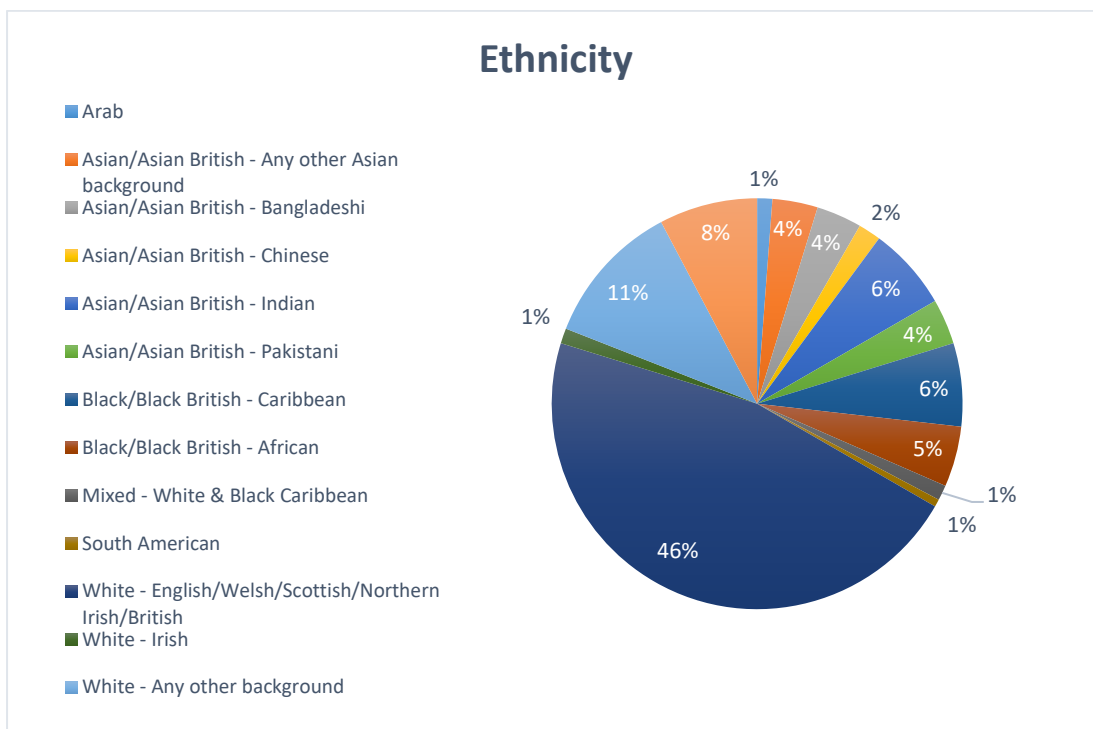


Figure 3.7 – Ethnicity

### 3.4.2 Employment Status

The analysis of demographic data revealed a slight underrepresentation of unemployed individuals, accounting for only 2% of the representors, despite comprising 5% of the population. Similarly, those in full and part time employment were also underrepresented, making up 48% of respondents compared to the 56% of the employed population. However, there was an improvement on the previous stage of consultation, where full and part-time employed residents only constituted 33.33% of respondents. The representativeness of this data is limited however, as only half of those who completed the demographic survey didn't answer this question or preferred not to say.

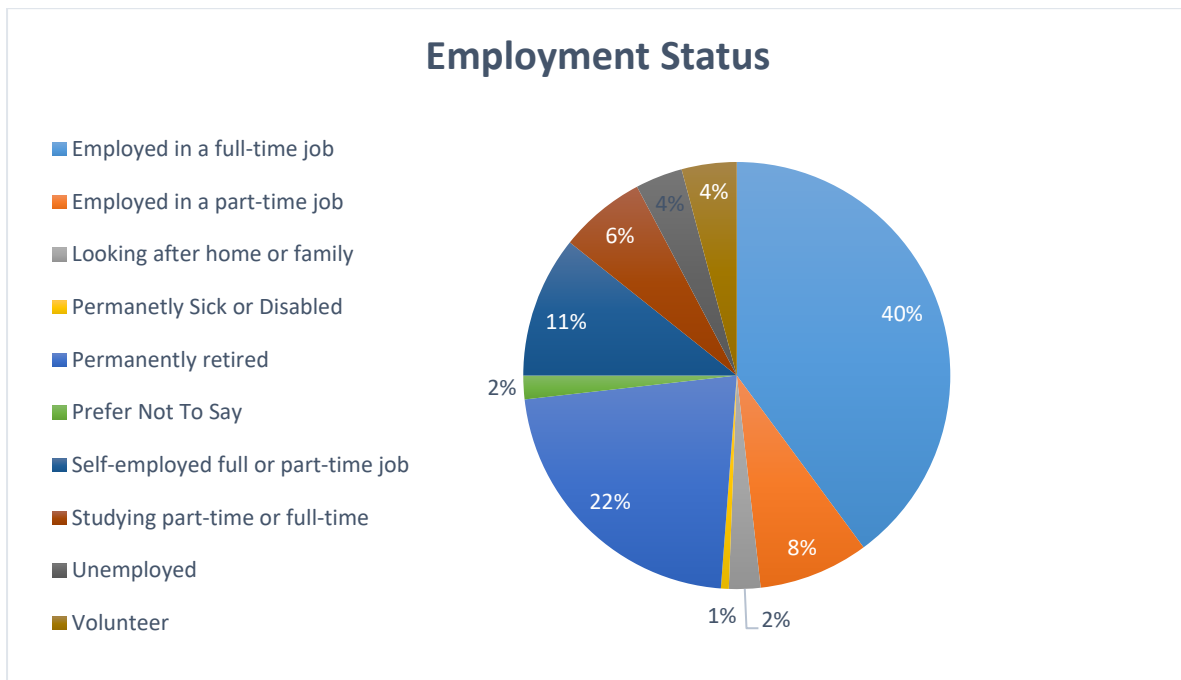


Figure 3.8 – Employment Status

### 3.4.3 Sexuality

Our demographic analysis has highlighted an underrepresentation of individuals identifying as Gay/Lesbian, Bisexual, and other in the Regulation 18 consultation, comprising only 4% of the representors despite accounting for 8.33% of Newham’s population. While this marks an improvement from the previous consultation where this group made up just 2.56%, there is still room for improvement. Notably, the increase in representation may be attributed to a reduction in those preferring not to answer this question, which was 58% of respondents in the Issues and Options consultation and decreased to 14% in the Regulation 18 consultation.

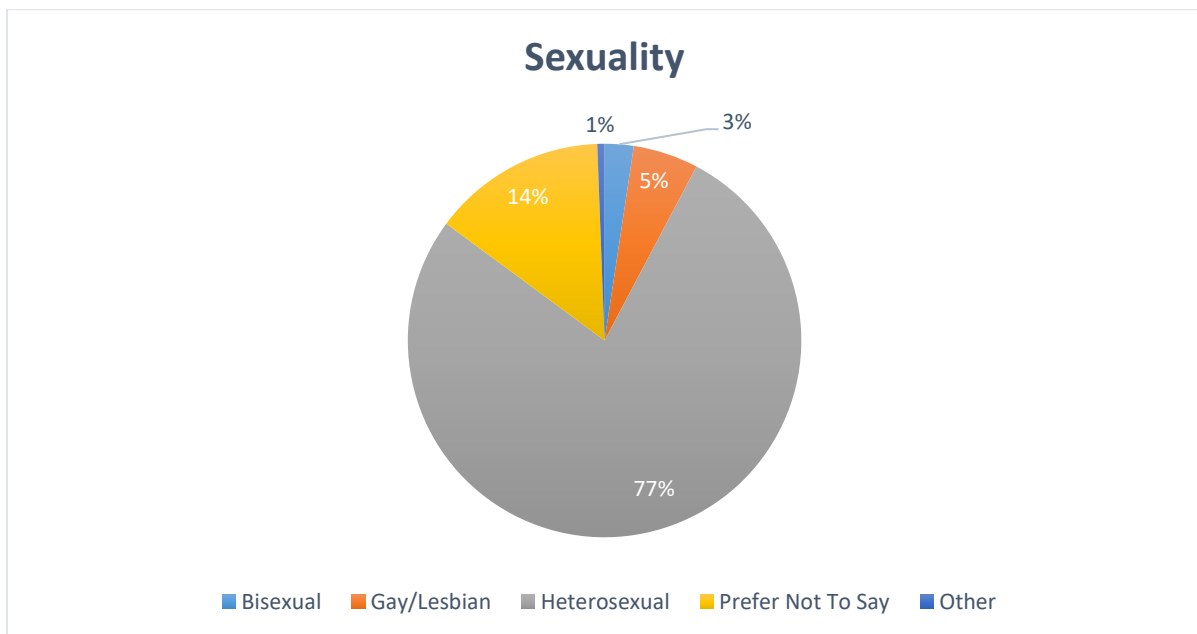


Figure 3.9 – Sexuality

### 3.4.4 Faith

The equalities data has revealed gaps in the representation of people of different faiths in the Regulation 18 consultation. Only 12% of the representors identified as Muslim, despite accounting for 34.8% of the population. Likewise, 35.3% of representors identified as Christian, compared to the 47% Christian population in Newham. Additionally, respondents with no religion were overrepresented, making up 35% of representors, while constituting only 14.5% of Newham’s population. Although there has been an improvement from the previous stage of consultation where Muslim residents made up only 3.42% of respondents and Christian residents accounted for 17.09%, further efforts are needed. Additionally, the level of representation may have been impacted by nearly half of the respondents who completed the demographic survey didn’t answer this question or preferred not to say.

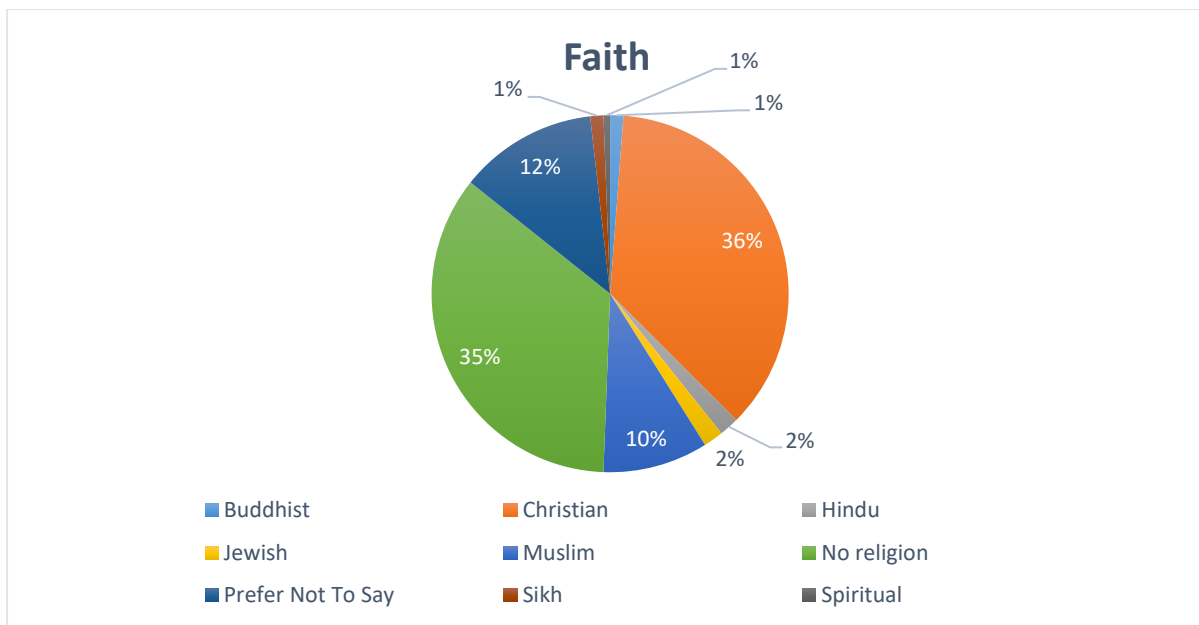


Figure 3.10 – Faith



### 3.4.5 Age

The analysis of demographic data unveiled a gap in the representation of young people in the consultation. While 13.2% of Newham’s population were aged between 16-24, this group accounted for only 3% of representors. Conversely, there was an overrepresentation of over 65s, accounting for 27% of representors despite only accounting for 7.1% of Newham’s population. Although, significant efforts were made to engage young people at the issues and options and Regulation 18 stages, most notably from the work with the Young Commissioner. These showed as under 16s engagement increased from 1% in the Issues and Options stage to 2% of representors at regulation 18.

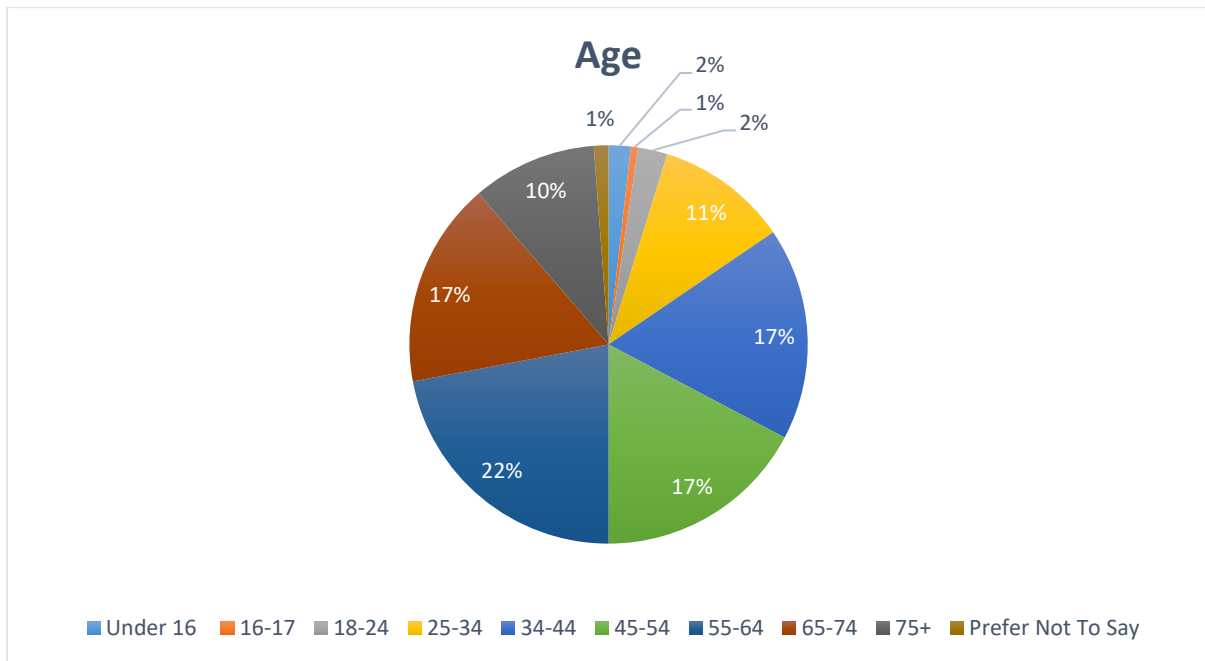


Figure 3.11 – Age

### 3.4.6 Gender

The analysis of the demographic data found a balanced gender representation among residents, with 51% identifying as male and 47% as female. This closely aligns with the population distributed in Newham, where gender demographics were 49.9% Male to 50.1% Female. While the representation of binary genders is quite accurate, there is a notable overrepresentation of non-binary respondents at 1%, compared to the 0.06% reported in the Census 2021 for Newham. This discrepancy may be attributed to the small sample size. Additionally, 1% of respondents preferred not to disclose their gender, contributing to the slight variation from Newham's population distribution. Nonetheless, this represents an improvement compared to the previous consultation, where males made up only 43% of respondents.

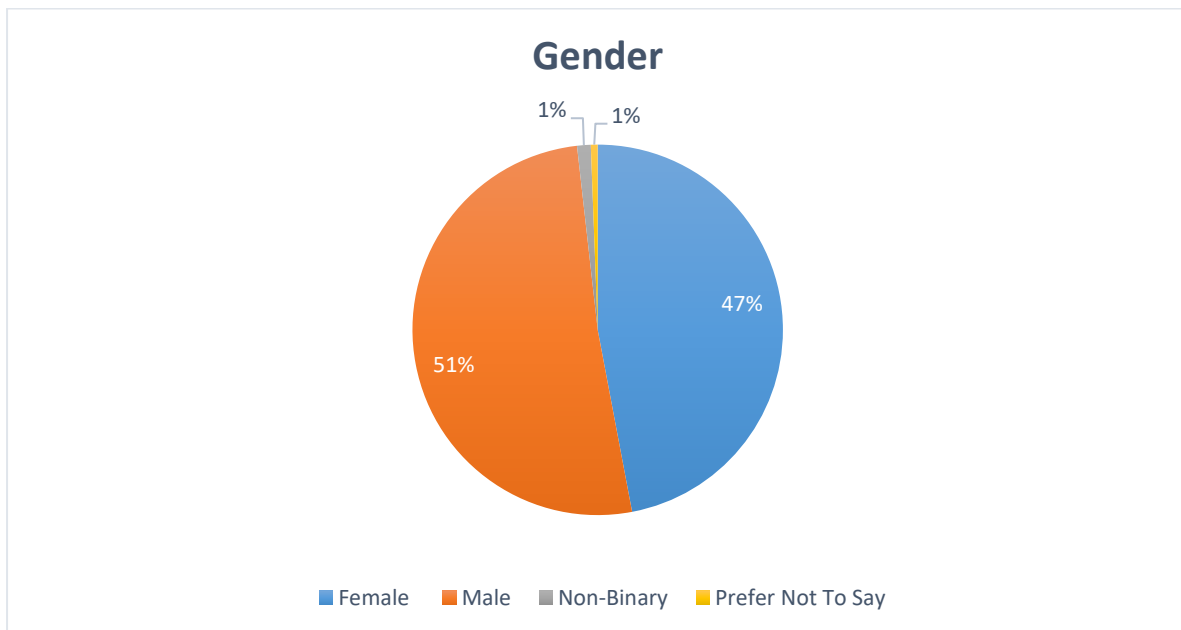


Figure 3.12 – Gender

### 3.4.7 Disability

The analysis of the disability data has found disabled people were underrepresented in the Regulation 18 consultation. The data revealed 12% of participants identify themselves as disabled compared to the 17.5% of Newham’s population who identify themselves as disabled. In comparison, the representation of people who are not disabled was wholly representative, with 82% of participants matching the percentage of the population who are not disabled. However, the underrepresentation of those identifying themselves as disabled may be partially due to 6% of participants preferring not to say.

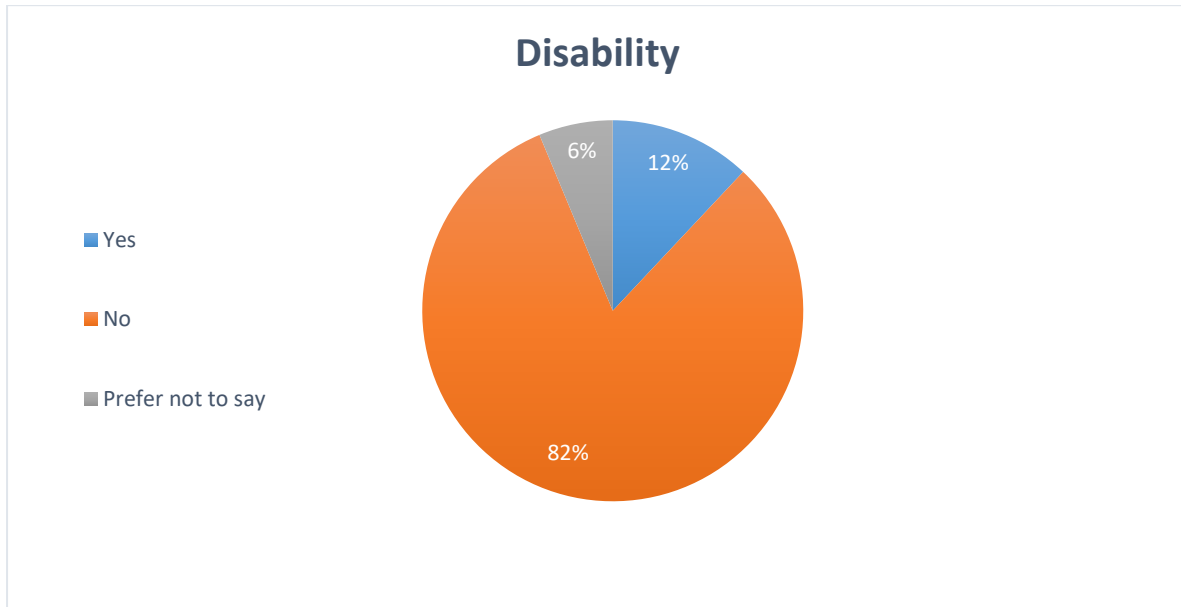


Figure 3.13 – Disability

## 4. Summary of responses

This chapter outlines our response to comments from the Regulation 18 consultation. The table details the key points raised in the comments, and our response outlining how these comments have been addressed or why they have not been addressed. The summary of responses table is then followed by the Young Commissioners summary, identifying the key themes from exercise 1 of the Young Commissioners Workshop, what should remain in the Vision and Objectives and how does the Vision and Objectives reflect the Young People's Charter. The full tables of comments and responses can be found in (Appendix 7).

## Summary of Responses Table

Themes and Policies	Responding to consultation representations	
	Main responses raised	Our response (How have these been addressed or why have changes not been made)
<b>Consultation Design</b>		
Consultation Design	<p><b>Design and accessibility of the plan on Co-create</b></p> <p>A number of residents said they found the platform difficult to access and provide comments, especially on the mobile site. Although, a number of residents also said the platform and consultation was well designed, making it easy to understand and submit a response.</p> <p><b>Concern that comments will be ignored</b></p> <p>A number of residents and a community group representative expressed the concern, that the council will not read, respond or incorporate comments raised in the consultation.</p> <p><b>Inclusion of marginalised communities and digitally excluded</b></p> <p>A number of residents and Councillors raised concerns regarding efforts to include the elderly, digitally excluded and marginalised communities who are less likely to engage with the consultation process.</p> <p><b>No confirmation comments had been submitted or received</b></p>	<p><b>Design and accessibility of the plan on Co-create</b></p> <p>We are working with the third party Co-create, who design our council engagement platform, to improve the accessibility and function of the Local Plan and response form.</p> <p><b>Concern that comments will be ignored</b></p> <p>All the comments in the consultation report will be considered and addressed, with individual responses. Please see the detailed list of representation and responses and the Issues and Options Engagement Report which provides evidence of this.</p> <p><b>Inclusion of marginalised communities and digitally excluded</b></p> <p>The consultation includes a wide range of methods to reach all of Newham’s population using a combination of online and offline methods. Making sure the groups such as the elderly, digitally excluded and marginalised communities are given the opportunity to engage with the Local Plan.</p> <p><b>No confirmation comments had been submitted or received</b></p> <p>Responses provided by email receive an automatic response. However we are unable to provide this functionality using co-create.</p>

	<p>A few residents and developers raised the concern that they had received no confirmation that their comments had been submitted or received.</p> <p><b>Resident Associations not consulted</b> A resident and community group representative objected to not consulting resident associations.</p> <p><b>Community assembly times exclusionary</b> A resident object to community assemblies being held in the evening as it excludes parents, the elderly and the disabled, who may be less able to attend in the evening.</p>	<p><b>Resident Associations not consulted</b> Significant efforts were made to reach residents through community groups and representative organisations. We also encourage individuals or organisations can also signup to our planning database to ensure they are informed of planning consultations.</p> <p><b>Community assembly times exclusionary</b> At the Regulation 18 consultation we held a drop-in session in the daytime and an online informative workshop for those who could not attend the evening community assemblies. We will be holding further day time events during the regulation 19 consultation.</p>
<b>Local Plan Section 1</b>		
Introduction	<p><b>General Support</b> Residents broadly found the introduction helpful and informative. Although some residents wanted further details to be added on cleanliness, crime, greenspace and air quality.</p> <p><b>15 minute neighbourhoods</b> A number of residents expressed concerns relating to 15 minute neighbourhoods and its implementation. In particular concerns that this approach was designed to reduce freedom of movement or limit choice. There were concerns it was undemocratic and not consulted on.</p>	<p><b>General Support</b> Support for the section is welcomed. As the purpose of this section is to provide a general overview of the Local Plan and other sections of the plan include more details, we have not made these additions. Where suggestions are beyond the scope of the Local Plan, we have provided them to our colleagues in other departments.</p> <p><b>15 minute neighbourhoods</b> No changes have been made to the approach as the Council’s commitment to delivering 15 minute neighbourhoods has been outlined in a number of documents and the whole Local Plan has been subject to detailed consultation. However further information regarding the delivery of 15 minute neighbourhoods has been added to the justification text for BFN1 to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind</p>

	<p><b>Clarity on the role planning regulations</b> One resident requested that further clarity be provided on when the Local Plan is required to be reviewed and the role of planning relative to other regulatory functions.</p> <p><b>Impact of Growth</b> A number of residents raised concerns regarding the impact of housing growth on access to infrastructure, including schools, health centres and parks</p>	<p>this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p> <p><b>Clarity on the role planning regulations</b> Changes have been made to provide further detail and clarity regarding when the Council is required to review the Plan and the role of planning relative to building control.</p> <p><b>Impact of Growth</b> No changes to this part of the Plan were made as a result of these concerns, as they are addressed in the Spatial Strategy and Developer Contributions policies as well as in the Social Infrastructure chapter. Ensuring that the impact created by additional housing is managed and mitigated is one of the key objectives of the Local Plan. This includes through allocating land for more schools and facilities and working with partners so they build sufficient utilities provision and securing contributions from developments which can be spend on making improvements to the local environment.</p>
All About Newham	<p><b>More data requested</b> A number of residents and businesses requested further details to be added to this section on greenspace, demographics and the faith, community and voluntary sector. The LLDC requested clarity on whether the housing figures included their data too.</p> <p><b>15 minute neighbourhoods</b> A number of residents expressed concerns relating to 15 minute neighbourhoods and its implementation. In particular concerns that this approach was designed to reduce freedom of movement or limit choice. There were concerns it was undemocratic and not consulted on.</p>	<p><b>More data requested</b> While this section is intended as a short overview of the borough, further details were added regarding demographic data available since the release of Census 2021 data as well as more information on the faith, community and voluntary sector. The wording and housing figures have been updated and clarified to explicitly include the LLDC.</p> <p><b>15 minute neighbourhoods</b> As above, no changes have been made to the approach as the Council's commitment to delivering 15 minute neighbourhoods has been outlined in a number of documents and the whole Local Plan has been subject to detailed consultation. However further information regarding the delivery of 15 minute neighbourhoods has been added to the justification text for BFN1 to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of</p>

		<p>facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>
<p>Vision and Objectives</p>	<p><b>General Support</b> A broad range of consultees supported the vision or aspects of it.</p> <p><b>Gentrification</b> A few residents and Councillors expressed concern that the Plan was not sufficiently radical to reduce or tackle gentrification in the borough.</p> <p><b>More objectives</b></p>	<p><b>General Support</b> Support for the vision and objectives is welcomed.</p> <p><b>Gentrification</b> Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, businesses and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also requires that all significant developments are masterplanned alongside the existing community - so that the community are central to shaping the borough as it changes. However the Local Plan must remain deliverable within the context of national and regional policy and legislation.</p> <p><b>More objectives</b></p>



	<p>A number of residents requested additional objectives to be added on open space, air pollution, litter, community facilities, shops, cycling, culture, areas of the borough and transport. Natural England requested further wording on protecting the natural environment and tackling the climate emergency.</p> <p><b>Role of specific sites</b> A developer and the Royal Docks team requested that changes be made to the vision and objectives to change the nature of the development proposed on their site and place more emphasis on the Royal Docks.</p> <p><b>Deliverability of Objectives</b> A community group objected to a number of the objectives on the grounds that a Local Plan cannot deliver them, including: Living Wage, measuring health and happiness, ensuring developments work for a range of residents.</p> <p><b>Small sites</b> A resident and Councillors raised a concerns that the Plan doesn't include reference to intensifying council housing sites.</p>	<p>Further sub-points and wording have been added to the objectives to address nature, litter and the climate emergency. Some suggestions were not incorporated as they were considered too detailed for this section and were captured in the neighbourhood chapters and/or thematic policies.</p> <p><b>Role of specific sites</b> A change was made to indicate the wider range of economic activity that will take place within the Docks. No other changes were made as the vision is a borough wide statement, with further detail provided in the relevant neighbourhood visions for the different parts of the borough.</p> <p><b>Deliverability of Objectives</b> No changes were made to these objectives as each is supported by policies in the Plan which will implement and measure their delivery.</p> <p><b>Small sites</b> Wording has been added to clarify that the intensification of smaller sites, including council owned sites have a significant role to play in the Plan's Spatial Strategy. Policies in the Housing and Design chapters already specifically support small site intensification and the Characterisation Study includes a Small Site Intensification Design Guide.</p>
<b>Building a Fairer Newham</b>		
BFN1 Spatial Strategy	<p><b>General Support</b> This policy was broadly supported by developers, duty to cooperate partners and statutory consultees, including the Mayor of London.</p> <p><b>Employment references</b></p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Employment references</b></p>

	<p>Developers requested a number of changes related to referencing employment uses on certain site allocations.</p> <p><b>Open space requirements</b> Developers and the Royal Docks Team requested greater flexibility on the open space requirements, suggesting there is insufficient evidence to proscribe the type and scale of open space.</p> <p><b>Walking and cycling routes</b> The Royal Docks Team and residents suggested more references should be included to specific walking and cycling routes, including the Royal Docks Corridor Scheme.</p> <p><b>15 minute neighbourhoods</b> A number of residents raised concerns regarding the intentions and deliverability of 15 minute neighbourhoods.</p> <p><b>Delivery of Infrastructure</b> The Royal Docks Team requested greater coordination of social infrastructure and developers requested greater</p>	<p>These changes were not made as the level of detail in the policy is considered suitable for a strategic policy and the allocation requirements align with the employment policies and Employment Land Review evidence base.</p> <p><b>Open space requirements</b> Changes to this policy approach have been made to reflect the latest Green and Water Spaces Strategy. This outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough and so requirements to deliver Local Parks have been retained.</p> <p><b>Walking and cycling routes</b> A change to this policy has been made to better reference the need for improved local walking and cycling connections.</p> <p><b>15 minute neighbourhoods</b> Further explanation regarding 15 minute neighbourhoods has been provided in the justification text for BFN1 to better explain the intention and implementation of the concept in particular to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p> <p><b>Delivery of Infrastructure</b> Updates were made to the policy to reflect the latest infrastructure specific evidence base documents. No further changes were made to</p>
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	<p>flexibility to assess need at time of application. The Environment Agency suggested this should be considered earlier in the process. Sports England wanted to ensure the requirements were inline with up to date evidence.</p>	<p>respond to these comments as the Plan, supported by infrastructure specific evidence base and the Infrastructure Delivery Plan, provides sufficient evidence on need, coordination and delivery of infrastructure.</p>
<p>BFN2 Co-designed masterplanning</p>	<p><b>General Support</b> This policy was strongly supported by residents, the Mayor of London, neighbouring Planning Authorities, statutory consultees and some developers.</p> <p><b>Post Occupancy Surveys</b> The Home Builders Federation and a number of developers questioned the purpose and value of post occupancy surveys. A resident highlighted their importance. Councillors expressed their support for such surveys and wanted more detail on their implementation.</p> <p><b>Definition, explanation and inclusion of, co-design</b> There was broad support for the requirement to undertake co-designed masterplanning from developers, residents, neighbouring boroughs, the Mayor of London and Transport for London. A number of residents, developers and the Friends of Queens Market requested further detail be provided on what would constitute co-design. A few developers requested the removal of the requirement.</p> <p><b>Piecemeal Development</b> Developers objected to the policy wording resisting piecemeal development and the policy requirement to bring forward a masterplan which covers the whole of a</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Post Occupancy Surveys</b> A change to this policy has not been made as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives and the implementation text already provides an explanation of their purpose and delivery.</p> <p><b>Definition, explanation and inclusion of, co-design</b> A change to the approach was not made as we did not consider that the additional of further detail or definition of co-design to be appropriate in the policy wording. As such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development. The removal of the requirement was not considered in line with the Plan and Council's objectives regarding people powered Newham.</p> <p><b>Piecemeal Development</b> A change to this policy has not been made as the wording has been retained (with changes to reflect the new Plan's objectives and updated legislative requirements) from the current adopted policy S1. This policy</p>

	<p>site allocation, on the basis that a number of site allocations have a number of owners.</p> <p><b>Meanwhile uses</b> Developers and the Royal Docks Team were broadly supportive of policy which requires phased sites to consider delivery of meanwhile uses and submit meanwhile use strategies but raised questions about how they would be secured, the impact on the final scheme as well as raising questions on support for speculative meanwhile applications.</p> <p><b>Masterplanning requirements application to employment uses</b> One developer objected to masterplanning objectives applying to employment sites on the basis they weren't applicable to those types of uses.</p>	<p>is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development.</p> <p><b>Meanwhile uses</b> Further guidance has been provided regarding securing meanwhile use strategies and the relationship with the final scheme in the implementation text. A new policy clause has been created in policy BFN1 to provide greater clarity on how speculative meanwhile use applications will be assessed, as well as requirements for meanwhile strategies on phased sites.</p> <p><b>Masterplanning requirements application to employment uses</b> This policy approach has now changed due to provide clarity on its applicability to developments providing a range of uses. The Council does not consider industrial sites, or any other uses, unable to consider or deliver the aspects or objectives listed in the policy. They are broad enough principles to be adapted to any site and use specific contexts.</p>
<p>BFN3 Social Value and Health Impact Assessment – delivering social value, health and wellbeing</p>	<p><b>General Support</b> There was broad support for this policy from residents, one neighbouring borough, developers and one community group.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Scope of the SV-HIA</b></p>

	<p><b>Scope of the SV-HIA</b> One developer asked for further guidance on the scope and requirements of the SV-HIA.</p>	<p>This policy approach has now changed to provide greater clarity on the approach to SV-HIA. P</p>
<p>BFN4 Developer contributions and infrastructure delivery</p>	<p><b>Prioritisation of affordable housing relative to infrastructure</b> Sports England, the Environment Agency, Transport for London raised concerns regarding the planning obligation hierarchy placing the delivery of affordable housing first. A number of residents raised the importance of sufficient infrastructure to support growth in homes.</p> <p><b>Financial contributions to non-council public services</b> The Lee Valley Regional Park Authority, NHS and Metropolitan Police requested that the plan include explicit support to secure funding from developments for their organisations.</p> <p><b>Infrastructure Sufficiency Assessments</b> A number of developers suggested the removal of the requirement for high density developments to demonstrate there is sufficient infrastructure to support the scale of development on the basis that this is the role of the Council through strategic planning.</p>	<p><b>Prioritisation of affordable housing relative to infrastructure</b> This policy approach has now changed to provide better clarity on the approach which will be used to ensure required infrastructure will be delivered, while emphasising the Council's commitment to delivering affordable housing.</p> <p><b>Financial contributions to non-council public services</b> Further clarity has been made to the relevant parts of the Plan (Social Infrastructure, Green and Water Infrastructure, Design and High Street policies). Where requested by the NHS, using the opportunities to meet these needs identified by the site allocation methodology work, the delivery of a health centre designed to meet NHS needs and standards is required on specific site allocations. The Plan requires the delivery of the health facilities to be subject to a needs base assessment at the time of delivery. Where no NHS facility is coming forward on a large site, any financial contributions would be considered at application stage and on an application specific basis and the financial contribution linked to a specified health project where the health needs of that population would be met. A similar scheme and site secured specific approach will be taken to securing contributions for the Lee Valley Regional Authority and Metropolitan Police.</p> <p><b>Infrastructure Sufficiency Assessments</b> This change was not made, although a change to the policy was made so it no longer refers to referable schemes. This policy wording reflects London Plan policy D2 and the development scale thresholds relates to the scale of development we consider to be high density (see policy D4 in the Draft Local Plan) and the important relationship between masterplanning and consideration of infrastructure capacity. The policy</p>

	<p><b>Clarity on planning obligations</b> The Metropolitan Police and a number of developers requested greater clarity on where planning obligations can be found, formulas to calculate them and a suggestion to list them in one location.</p>	<p>is considered important for the Council to ensure that there is sufficient infrastructure capacity to support growth, as per the requirements of London Plan policy D2.</p> <p><b>Clarity on planning obligations</b> No change to this policy has been made to address these comments. As policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text. Formulas have been added to these, where relevant.</p>
<b>Design</b>		
D1 Design standards	<p><b>Inclusive design standards</b> Residents, Councillors and the LLDC requested more explicit policy support for inclusive design standards. Sports England recommended explicitly supporting active design to help encourage active lifestyles for everyone.</p> <p><b>Concern with quality of recent developments.</b> Several residents and Councillors have commented to express their concern with recent developments in their area/Newham being of low quality, from large scale schemes to householder extensions. They were concerned that any design standards will not be adequately and consistently applied.</p> <p><b>Preferential location of plant equipment</b> Developers were concerned that giving priority to underground placement of plant equipment would be unreasonable and add costs where excavation is not normally expected.</p>	<p><b>Inclusive design standards.</b> This policy has changed to include additional references to inclusive and active design standards, making use of nationally available best practice guidance and the LLDC inclusive Design Standards 2019.</p> <p><b>Concern with quality of recent developments.</b> A change to this policy has not been made as the policies draw on substantial current best practice guidance as well as learning from recent developments in Newham. However, a change to the implementation text of this policy has been made to provide additional guidance for householder extensions.</p> <p><b>Preferential location of plant equipment</b> This policy has now changed to provide more flexibility to site-specific constraints while ensuring it is effectively integrated in the overall design of a scheme.</p>

	<p><b>Role of Secured by Design guidance and security related planning obligations</b>          Metropolitan Police Service supported the recognition of the standard in policy and suggested that the Local Plan could include a specific safety and security policy. They also requested that the policy implementation include support for a broad range of planning obligations being secured to support policing infrastructure, and that Designing out Crime officers could be involved in the design review process. A resident supported the use of the standard.</p> <p><b>Role of architect</b>          Developers expressed concern that the requirement for retention of original is not necessary to secure quality of a development to completion in the context of existing development management practices, including design review, and that it promotes anti-competition across architects. One developer suggested that the role of original architects as design guardians working alongside the technical delivery architect(s) may be more appropriate.</p> <p><b>Role of community design review</b>          London Borough of Redbridge supported the concept of a youth design review panel. Councillors were concerned that there isn't enough opportunity for residents to influence development in the borough. Residents also supported the opportunity to provide local feedback into the development of a scheme at an earlier stage. Developers supported the idea, and requested more information on how the panel would run alongside the professional Newham Design Review Panel. A resident</p>	<p><b>Role of Secured by Design guidance and security related planning obligations</b>          Support noted. We did not consider a specific policy to be necessary as designing out crime and embedding safety considerations are suitably addressed through policy D1 and a range of other policies across the Plan. Further, we consider the planning obligation as set out is sufficiently flexible to address a range of local security and policing interventions that may be required to mitigate the impacts of development.</p> <p><b>Role of architect</b>          This policy approach has now changed to allow for more flexibility on the method of retaining architect oversight.</p> <p><b>Role of community design review</b>          We have not made changes to this policy as the policy already supports public engagement and co-design. However, the policy implementation text has changed in response to further best practice research.</p>
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	<p>suggested there could be a role for residents to help monitor the quality of development on a site and provide feedback to the council.</p> <p><b>Application of standards to employment uses</b> Developers requested that more flexibility is added into the policy to recognise that not all criteria will be suitable or appropriate for industrial or logistics use developments.</p> <p><b>Application of standards to temporary buildings</b> A developer raised concerns that the design requirements are onerous for shorter term temporary developments and may render them unviable.</p> <p><b>Residential extensions, front gardens and walls.</b> A small developer requested support for two storey extensions. A resident requested additional support for reinstatement of front gardens and walls.</p> <p><b>Planning obligations for post-occupancy surveys</b> Developers argued that the need for post-occupancy surveys should be negotiated on a site by site basis. A</p>	<p><b>Application of standards to employment uses</b> This wording change has not been made as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. The principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.</p> <p><b>Application of standards to temporary buildings</b> This policy approach has now changed to provide a more proportionate approach to the design standards and time length of temporary developments. Please see the new wording in Policy D1 Design Standards.</p> <p><b>Residential extensions, front gardens and walls.</b> A change to this policy implementation text has been made to provide additional guidance for householder extensions and for the role of front gardens. However, we did not consider it appropriate to explicitly support two storey extensions as the policy criteria set within policies D1 and D7 (now D6) are considered effective at addressing the design quality for a range of small scale developments.</p> <p><b>Planning obligations for post-occupancy surveys</b> A change to this policy has not been made as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful</p>
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	<p>resident suggested the requirements should be made stronger in order to better monitor the quality of development, tied to improved enforcement processes.</p>	<p>the Plan has been at delivering its objectives. However, the planning obligation in D1 was a duplication of requirement in policy BFN2 and has now been removed from this policy's list of obligations.</p>
<p>D2 Public realm net gain</p>	<p><b>Inclusive design standards</b>  LLDC recommended the use of additional guidance documents and to ensure that the policy makes clearer the importance of targeted engagement to understand the experience of different user groups, particularly women and girls. Historic England recommended the inclusion of their advice note Streets for All to the implementation guidance. Residents have also raised concerns about the quality of the public realm: its upkeep, accessibility, safety, lack of greenery, signage legibility, and clutter.</p> <p><b>Active Travel Zone Assessment vs. Healthy Streets Framework</b>  TfL argued that the type of assessment used to inform public realm net gain should be the Active Travel Zone Assessment</p> <p><b>Green infrastructure as part of public realm interventions</b>  The part of the policy was supported by the Environment Agency, Lee Valley Regional Park Authority and the London Historic Parks and Gardens Trust. EA recommended to include Natural England's Green Infrastructure Framework and the GLA's Urban Greening Factor (UGF) guidance documents in the implementation section of the policy. London Historic Parks and Gardens Trust recommended that green infrastructure in the public realm should be supported more broadly rather than in areas of deficiency. There was also broad support from developers.</p>	<p><b>Inclusive design standards</b>  This part of the Plan has now changed to provide further inclusive design criteria and relevant best practice guidance to support implementation. Guidance to inform quality of signage that can improve accessibility for people with disabilities, including dementia, have been included in Policy D5 (formerly D6) on Shopfronts and Advertising.</p> <p><b>Active Travel Zone Assessment vs. Healthy Streets Framework</b>  This change has been made.</p> <p><b>Green infrastructure as part of public realm interventions</b>  Support was welcomed and we have amended the policy to clarify that green infrastructure is a requirement for developments across the brought, rather than just in areas of deficiency of access.</p>

	<p><b>Playspace in public realm</b> Developers requested more flexibility on this policy to reflect circumstances where site constraints would not allow for public access to the playspace provided, e.g. when located at podium level. One developer objected to the principle of requiring developers to provide additional playspace to cater for existing deficiencies.</p> <p><b>Additional public realm floorspace on large sites</b> Developers questioned what quantitative public realm gains are expected, if there is a specific methodology for calculating additional floorspace for public realm. They noted that the principle is supported, however not all sites can deliver substantial increases in public realm.</p> <p><b>Formula for calculating planning obligations for maintenance of highways</b> Developers requested clarification of how the planning obligation will be applied and calculated</p>	<p><b>Playspace in public realm</b> We have updated this policy following the completion of the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being embedded in site allocations, and thereafter this policy has been amended to clarify that it is complementary to the requirements established in the site allocations, encouraging additional provision of playspace to be located in the public realm of the scheme.</p> <p><b>Additional public realm floorspace on large sites</b> This policy part has been removed in recognition that requirements for new public realm floorspace are embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy.</p> <p><b>Formula for calculating planning obligations for maintenance of highways</b> This planning obligations approach has now changed to provide the methodology for calculating maintenance costs, in line with the Highways department's practice.</p>
<p>D3 Design-led residential site capacity optimisation</p>	<p><b>Design-led approach</b> There was broad support for the principles of this policy across developers. London Borough of Waltham Forest also expressed support.</p> <p><b>Moderate uplift in density</b> Developers argued that the word 'moderate' should be removed and that more support should be given in the policy for higher density development in more accessible areas. A developer suggested that the policy map should show the 'transform', 'enhance' and 'conserve' areas within Newham.</p>	<p><b>Design-led approach</b> Support for this policy is welcomed.</p> <p><b>Moderate uplift in density</b> A change to this policy has not been made as the policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the Characterisation and Growth Strategy LPG (2022).</p>

<p>D4 Tall buildings</p>	<p><b>Flexibility - Greater heights</b>          Developers considered the proposed prevailing heights and maximum heights permissible too restrictive and requested either the removal of maximum height parameters and/or to have greater prevailing heights and/or maximum heights. Some developers also proposed allowing more flexibility for tall buildings outside of tall building zones. They raised concerns that the evidence base was not robust enough to mandate these heights and zones.</p> <p><b>Too many tall buildings</b>          Residents objected to tall building developments - especially for residential uses - and proposed restrictions on building heights to maximum 6 storeys, expressing their concern regarding potential antisocial behaviour experienced in the past in high rise council estate buildings, overshadowing and overlooking issues and the design quality of tall building developments when they are not well integrated with the surrounding low rise/medium rise context.</p>	<p><b>Flexibility - Greater heights</b>          A change to this policy approach has not been made as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and requires boroughs to identify in their development plan what is considered a tall building for their specific localities.          Newham’s Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Through this further analysis it was concluded if a tall building zone designation could be extended to areas that had the same sensitivity and suitability for tall buildings developments as other areas already allocated to tall building designation and if the maximum proposed heights were in line with the methodology or should be amended.</p> <p><b>Too many tall buildings</b>          Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey." In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding. Tall buildings are key to deliver the much needed homes and the emerging Local Plan has identified suitable locations for tall building developments and the maximum heights that could be acceptable in these locations.</p>
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	<p>expressed in meters in the tall building zones and expressed in number of storeys in the site allocation design principles. They also raised that different land uses could require different floor-to-floor heights and could therefore result in a different number of storeys.</p> <p><b>Support industrial intensification</b> Developers with an interest in industrial lands in the Borough requested the reconsideration of the approach to tall building zones in the context of London Plan and Local Plan industrial intensification objectives.</p> <p><b>Impact on conservation areas and heritage assets</b> The GLA supported the policy and the methodology but suggested to refine the policy to ensure the London View Management Framework (LVMF) View 9A.1 is protected. Historic England objected to the impact tall building developments could have on conservation areas and requested better reference to heritage considerations.</p> <p><b>Impact on watercourses, open spaces and microclimate</b> Public bodies (the Canal River Trust, Environment Agency and Lee Valley Regional Park Authority) objected to the impact tall building developments could have on watercourses and open spaces and the risk to groundwater for tall buildings in locations within Source Protection Zones (SPZs). Residents objected to the impact tall buildings have on the microclimate and how this have a negative impact on pedestrian and cycling experience.</p>	<p>Prevailing heights and maximum heights are now expressed in meters providing an estimate of number of storeys could be achieved for explanatory purpose only. Furthermore, implementation text has been clarified to explain that Policy D4 applies to all buildings of 21 m, irrespective of use and related floor-to-floor height.</p> <p><b>Support industrial intensification</b> This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that, due to their location in the Royal Dock and Beckton Riverside Opportunity Area, the Strategic Industrial Locations could be included in the tall building designation in order to support industrial intensification with a stacked industrial typology.</p> <p><b>Impact on conservation areas and heritage assets</b> This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and key views set out in the London View Management Framework (LVMF) and in adopted Conservation Area Appraisals and Management Plans have been included. Wording has also been added to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas.</p> <p><b>Impact on watercourses and open spaces and microclimate</b> Further wording has been added to the implementation text to stress the importance of wind assessments in high streets and town centres, ensure groundwater resources are preserved and ensure the impact of tall buildings on watercourses are considered in line with Green and Water Space policies.</p>
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<p>D5 Living well at high density</p>	<p><b>Broad support for principle</b> Broad support from developers and the LLDC. Nevertheless, a residents noted that the policy is not very specific in how it may improve quality of high density developments, and another was sceptical of high density living being suitable.</p> <p><b>High density definition as 250 units/ha</b> A developer argued that the local 'higher density' level of 250 units/ha does not align with the London Plan (2023) higher density level of 350 units/ha. The LLDC noted that there are a number of areas in its remit where this density is achieved or surpassed in both delivered and approved schemes.</p> <p><b>Pedestrian-friendly prevailing building height</b> Two developers noted that the principle of pedestrian-friendly prevailing building height should not apply to the overall scale of development, but to the lower levels or podium.</p>	<p><b>Broad support for principle</b> Support is welcomed. The policy was developed in response to available best practice and the recommendations of the Newham Characterisation Study (2022), as available at the time of drafting. We recognise there is ongoing research into the interaction between density levels and health and wellbeing of people.</p> <p><b>High density definition as 250 units/ha</b> This policy has now changed to clarify that this policy provides additional design criteria for developments where the principle of high density development at or above 250units/ha is acceptable. This threshold has been identified following emerging research on how density impacts on quality of life and social inclusion, set out in the evidence base for the policy, and an assessment of major planning applications considered by the LPA over the last 5 years. The London Plan does not include the 350 units/ha as a threshold in policy, and it is intended to be an indication of how 'higher density' is to be interpreted, flexibly, in the London Plan (2021) policy context. This does not preclude boroughs developing their own standards for managing high density.</p> <p><b>Pedestrian-friendly prevailing building height</b> The policy has changed to clarify the intention to create a consistent base, rather than consistent overall height.</p>
<p>D6 Shopfronts and advertising</p>	<p><b>Scale of impact</b> Residents wanted the policy to be bolder and also directly address the quality of existing shopfronts. A business owner noted that the criteria must be flexible to apply in different circumstances.</p> <p><b>Protection of heritage</b></p>	<p><b>Scale of impact</b> We did not make changes to the policy as it is already considered to be suitably flexible. It is not possible to impose design standards retrospectively on existing buildings or to recently approved developments being delivered via the planning system.</p> <p><b>Protection of heritage</b></p>

	<p>A few residents were concerned with the quality of shopfronts and advertisements in the setting of conservation areas and other heritage assets.</p>	<p>The policy implementation approach has been changed to refer to the need to address heritage impacts however, the criteria cannot be applied retrospectively, or to changes/advertisements that do not require planning permission.</p>
<p>D7 Neighbourliness</p>	<p><b>Broad support</b> The Environment Agency, Network Rail, the Port of London Authority and business operators expressed support for the agent of change principles and the detailed guidance set in the policy. One developer also expressed support.</p> <p><b>Measuring amenity impacts</b> Tate &amp; Lyle suggested that implementation section should provide additional guidance on measuring the worst case scenario amenity impacts of established employment uses.</p>	<p><b>Broad support</b> Support for the policy is welcomed.</p> <p><b>Measuring amenity impacts</b> This change to the policy implementation approach has been made, to provide additional guidance of what an applicant should take into consideration when assessing the impact of neighbouring development on the amenity of future occupiers of the site.</p>
<p>D8 Conservation Areas and Areas of Townscape Value</p>	<p><b>Broad support</b> The Lee Valley Regional Park Authority, and residents expressed support for the policy. One business owner noted it was unclear what the policy is protecting.</p> <p><b>Consistency of heritage protection</b> Historic England were broadly supportive but expressed the need for the policy to be clearer and be further strengthened in relation to development that could potentially affect heritage assets and their significance.</p>	<p><b>Broad support</b> Support noted. No changes have been made as the policy sets out the framework of Council's legal responsibilities under which designations for Conservation Areas and Areas of Townscape Value are made.</p> <p><b>Consistency of heritage protection</b> The policy implementation text has now changed to require a Heritage Impact Assessment, and in the case of tall buildings also a Townscape Visual Impact Assessment, to justify the design solution and help mitigate any impacts on the significance of heritage assets or their setting. This is aligned with the revised approach in policy D4 (Tall buildings).</p>
<p>D9 Archaeological Priority Areas</p>	<p><b>Broad support</b> London Historic Parks and Gardens Trust, a resident and a developer expressed support for the policy.</p>	<p><b>Broad support</b> Support welcomed.</p>

	<p><b>Archaeological Priority Areas evidence base update</b> Historic England noted that the council should seek to update the spatial evidence base to reflect recent fieldwork which would helpfully refine both spatial extent and significance.</p>	<p><b>Archaeological Priority Areas evidence base update</b> Following further engagement with GLAAS, wording change has been made to indicate that the council will seek to commission this work during the lifetime of the Plan.</p>
<p>D10 Designated and non-designated heritage assets, ancient monuments and historic parks and gardens</p>	<p><b>Broad support</b> Historic England, London Historic Parks and Gardens Trust, a business owner and several residents expressed support for the policy. Residents expressed concern for the protection of heritage assets, including their maintenance and appropriate use, and a desire for stronger policy and enforcement.</p> <p><b>Non-designated archaeology</b> Historic England requested reference be included in the policy to non-designated archaeology.</p> <p><b>Harm vs. public benefit</b> Two developers argued that the policy should support less than substantial harm where there are public benefits emerging from the proposed scheme.</p>	<p><b>Broad support</b> Support noted. While we not residents desire to better protect heritage assets, we have not made changes to the policy as a level of change is sometimes necessary to maintain viable use of heritage assets, which will help preserve them.</p> <p><b>Non-designated archaeology</b> This wording change has been made.</p> <p><b>Harm vs. public benefit</b> A change to this policy approach has not been made as the policy is aligned with the NPPF approach, which gives significant weight to any level of harm to designated heritage assets and their setting.</p>
<p><b>High Streets</b></p>		
<p>HS1 Newham's Town Centres Network</p>	<p><b>Definition of town centres in Newham's context</b> Developers argued that the policy is unclear as it appears to separate local centres and larger town centres, rather than use the NPPF definition of 'town centre' for both.</p> <p><b>Katherine Road designations</b> Rt Hon Sir Stephen Timms MP welcomed the additional designations along this major route through the borough.</p>	<p><b>Definition of town centres in Newham's context</b> We have added a clarifying explanation that main town centre uses are directed to both town centres and local centres, as both types of centres meet the NPPF 'town centre' definition. However the Local Plan maintains the London Plan's definitions and referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres.</p> <p><b>Katherine Road designations</b> No changes have been made to these designations. As part of the review of Newham's town centre network at Reg 18 stage, we've</p>



	<p>Two residents expressed concern that previous refusals of planning permission have meant that shops have remained vacant. One resident argued that more of the street frontages should be protected, while another argued that the neighbourhood parade in the north of the street is low quality and should not be designated.</p> <p><b>15 minute neighbourhoods and the Newham Town Centres Network</b>          Developers broadly expressed support for the approach of the policy to ensure centres are within walking distance of the people they serve. Developers requested clarification that the policy’s catchment criteria only apply to proposals for new main town centre uses. One developer considered that the catchment criteria is unrealistic, while the Royal Docks team and a developer argued for more provision to be made for the Royal Docks area. A resident argued that using the 15 minute neighbourhood concept limits access to particular shops only, while several other residents supported the policy. Another resident argued for improved connectivity to and accessibility of the centres. Councillors commented that the concept of 15 minute neighbourhoods and the Local Plan neighbourhood boundaries require resident engagement.</p> <p><b>Impact Assessment requirement for new centres</b>          Two developers argued that the use of Impact Assessments as part of delivering new centres in line with the Local Plan designations is unnecessary and will hamper investment and deter businesses from locating in Newham. They consider the threshold of 300sqm GIA is too low.</p>	<p>designated significantly more frontages of Katherine Road, as 2 new Local Centres and an expanded Neighbourhood Parade. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the Town Centre Network Review Methodology Paper 2022.</p> <p><b>15 minute neighbourhoods and the Newham Town Centres Network</b>          No changes have been made to this policy approach. The idea of 15 minute neighbourhoods is used to ensure that all residents can live within a 15 minute walk of key facilities such as shops, community facilities and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan. In the case of this policy, the 15 minutes neighbourhood concept has informed the designations within Newham's Town Centres Network. Please see Town Centre Network Review Methodology Paper 2022 and the Town Centre Network Review Methodology Paper Update 2024. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities etc, and by creating new routes to increase access to existing facilities.</p> <p><b>Impact Assessment requirement for new centres</b>          Some clarifying language has been added to explain that the intention is that the overall scale of new local centres (or extensions to these) and new neighbourhood parades should be subject to an Impact Assessment, in order to ensure their scale is aligned with local need rather than a larger offer that may draw trade away from existing town and local centres. The threshold for the Impact Assessment has not</p>
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	<p><b>Scale criteria for new/extended local centres, including provision for 'small to medium sized food stores'</b>          Developers support the role of masterplanning in determining the overall location, scale and mix of the new main town centre uses. However, The Royal Docks team and two developers argued the policy needs more flexibility. They suggest that the quantum, size and location of units should be assessed on a case-by-case basis and based on evidence at the time of application, in order to respond to local needs and rapid changes in the retail and leisure industries and allow a suitable mix of uses.</p> <p><b>Stratford Town Centre</b>          A developer supported the ongoing vision to grow the centre to an international scale, while the LLDC requested additional support in policy for the growth of the centre. The LLDC further argued that the boundary as identified should be revisited as this does not accurately reflect the current boundaries as shown in the adopted Newham and LLDC local plans when taken together, and that it should include the East Bank area.</p> <p><b>East Village Local Centre</b>          The LLDC argued that the local centre boundary should be amended to include a significant new floorspace of town centre uses recently delivered.</p> <p><b>Silvertown Local Centre</b>          The Royal Docks team and a developer argued that the designation should be for a District scale or above. The developer further argues that the Silvertown Quays site</p>	<p>been changed. The requirements are in line with the NPPF and the recommendations of the Retail and Leisure Study (2022).</p> <p><b>Scale criteria for local centres, including provision for 'small to medium sized food stores'</b>          The policy has been updated and now allows for flexibility in unit sizes. Units should primarily be small but some units larger than 150sqm GIA can be delivered in Local Centres, if justified by local need. The policy on the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators.</p> <p><b>Stratford Town Centre</b>          The designation boundary of Stratford Metropolitan has now changed to correct the omission of the East Bank site. Additional guidance regarding the evolution of Stratford to an International scale has also been provided. Uses at plot N17 have been retained in the revised boundary of East Village Local Centre as the uses are suitable Local Centre uses and are spatially connected to the public realm of East Village Local Centre. More information is included in the Town Centre Network Review Methodology Paper Update 2024.</p> <p><b>East Village Local Centre</b>          The proposed change to the boundary of East Village Local Centre has been made.</p> <p><b>Silvertown Local Centre</b></p>
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	<p>allocation should deliver a new centre which is separate from the existing local centre at Royal Wharf, and that it is not appropriate for the location of this Local Centre to be illustrated on a map and/or the boundary should reflect the approved planning status of the site which includes significant allowances for town centre uses within and surrounding Millennium Mills.</p> <p><b>New designation potential along Portway in West Ham neighbourhood.</b> A resident raised the possibility to designate a local shops parade on Portway at the level of Amity Road (E15 3QJ).</p> <p><b>Gallions Reach Shopping Centre and relationship to the future town centre at Beckton Riverside</b> A developer argued that the new town centre designation on the site allocation should support the protection and ongoing maintenance of the existing shopping park and associated asset management through a phased delivery.</p>	<p>A change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. We have also clarified the centre’s relationship to the Excel centre and its visitors. However, we have retained the single local centre with Silvertown Quays and Royal Wharf as this optimises the ability to create an integrated and complementary single cluster. In addition, the policy already allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes.</p> <p><b>New designation potential along Portway in the West Ham neighbourhood</b> This new designation has been made, alongside protection of further frontages on Plashet Road to the east. These new designations help complete gaps in the network around West Ham Park. The Town Centre Network Review Methodology Paper Update 2024 sets out in further detail the assessment made.</p> <p><b>Gallions Reach Shopping Centre and relationship to the future town centre at Beckton Riverside</b> We have not changed our approach in relation to the Gallions Reach Shopping Park. The transformation of an out of town retail park into an accessible district centre, remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). To do otherwise risks entrenching a car-dependent and unsustainable retail location, potentially undermining the delivery of a more sustainable town centre network across the borough and East London.</p>
<p>HS2 Managing new and existing Town</p>	<p><b>Policy effectiveness</b> Several residents supported the policy, while a few more argued that the policy needs to be much bolder in order to improve the quality of the offer of Newham’s centres.</p>	<p><b>Policy effectiveness</b> Support for the policy is welcomed, some change have been made where supported by new evidence and these are outlined in more detail below.</p>

<p>and Local Centres</p>	<p>Some developers supported the objectives of the policy, while others have argued that the policy is overall too restrictive.</p> <p><b>Sports uses in town centres</b> Sports England objected to the loss criteria for Class E floorspace set out in the policy as it could potentially lead to loss of sports facilities that are otherwise protected in policy.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b> Two developers argued that the criteria is overly restrictive and not aligned with the national policy for diversity and flexibility of use.</p> <p><b>Meanwhile Use Strategy requirement</b> A developer expressed concern that the policy will limit the attractiveness of units within the Borough and restrict the letting of units to long term tenants, in favour of short term occupiers. Another developer argued that the policy is ineffective and the council should rely on enabling market flexibilities. A further developer supported the principle, but argued that the policy should allow for the strategy to</p>	<p><b>Sports uses in town centres</b> This policy has been updated to clarify that other policies, such as the Social Infrastructure policies, may also apply.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b> We have updated the policy to require different targets for the percentage of Use Class E floorspace within Primary Shopping Areas. We did not remove the targets as requested, as the approach is in line with the recommendations of the Retail and Leisure Study (2022), and Class E itself provides broad flexibilities of use. We have increased the targets as our objective is for town centres to maximise the quantity of town centre floorspace (Class E) and we have evidence demonstrating that the majority of centres, and particularly Stratford Town Centre, are already performing well in terms of the town centre floorspace (Class E) being provided within them. This means an increased target is deliverable.</p> <p><b>Meanwhile Use Strategy requirement</b> We have not changed our approach (although we have updated the name to a Vacancy Prevention Strategy) as our monitoring indicates that a number of recent large scale mixed use developments including main town centre uses have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan process enables proactive management of this issue. The potential benefits of having a meanwhile use</p>
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	<p>be appropriately developed and updated to reflect market conditions.</p> <p><b>Marketing Strategy requirement</b> A developer has argued that the requirement is not effective, but only a further burden on developers.</p> <p><b>Support for local small/independent businesses and affordable rent units</b> Residents requested that the Plan support local and independent businesses to set up, including through affordable rent arrangements, as they will help centres to thrive. Two developers argued that the policy will lead to unfair competitive advantage for some businesses and that it may deter development. One developer argued that the requirement should only apply to surplus floorspace, while another argued that it would be more appropriate to require 10% of floorspace to be at affordable rent levels, in line with approach taken by other councils for affordable workspace policies.</p>	<p>approach to managing vacancies, , are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022).</p> <p><b>Marketing Strategy requirement</b> This policy has not changed as the effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current planning permissions.</p> <p><b>Support for local small/independent businesses and affordable rent units</b> The policy approach remains broadly the same, however additional detail has been added about the expected approach to provision of affordable small business space within town and local centres, following additional research and recommendations set out in the Topic Paper: Supporting Provision of Affordable Small Business Premises (2024), appended to the Retail and Leisure Study (2022).</p>
<p>HS3 Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services</p>	<p><b>Broad support</b> A developer supported the clear scope of the uses to which the policy applies. Other developers welcomed the sequential test exemptions criteria. A resident also expressed support for the policy.</p>	<p><b>Broad support</b> Support noted.</p>

	<p><b>Support for businesses</b> A few residents recommended that the policy could further support local businesses. Developers have argued that the policy is too restrictive.</p> <p><b>Cafes in parks</b> A resident requested support for cafes in parks.</p> <p><b>Impact Assessment threshold</b> Developers argued that the Impact Assessment threshold at 300sqm is too low, and it will disadvantage traditional retailing compared to online retailing and will limit access to goods and services for residents.</p> <p><b>Use of conditions/obligations</b> Developers argued that the clauses for Marketing Strategy, Meanwhile Use Strategy and/or limiting the range of uses permitted on the site should be removed and conditions and obligations should only be applied on a case by case basis.</p>	<p><b>Support for businesses</b> No changes have been made as the local plan already supports creation of business spaces in suitable locations, primarily as part of the designated network of town and local centres and on employment designated land. In recognition of the important role that local small businesses play, certain exemptions from the nationally prescribed Sequential Test are also set out under this policy.</p> <p><b>Cafes in parks</b> This wording change has been made to support the principle of café facilities in parks.</p> <p><b>Impact Assessment threshold</b> This change has not been made as the Retail and Leisure Study (2022) indicated retail growth need can be accommodated within the Town Centres Network and there is no need to consider additional edge of centre or out of centre sites. The 300sqm benchmark has been used in Newham’s Local Plan for more than a decade, and the evidence indicates it remains relevant. Delivery-based uses are also subject to policies of this Local Plan directing their location and quality of provision.</p> <p><b>Use of conditions/obligations to limit the use permitted</b> This change has not been made as the planning permission in the out of centre location is granted based on the proposed use and the identified level of impact. Without adequate conditioning, a different use within the broad Use Class E may operate on the site and result in local impacts that have not been assessed or mitigated against at the planning application stage.</p>
HS4 Markets and	<b>Operation of markets, including sustainability best-practice.</b>	<b>Operation of markets, including sustainability credentials</b>

<p>events/pop-up spaces</p>	<p>Residents have been supportive of the policy. Several have asked non-planning related questions about the running and funding of markets and how support for these may be gained. Climate You Change have included recommendations on how markets can support climate change adaption and mitigation through their operation.</p> <p><b>Specific support for existing markets</b> Councillors raised concern that the Local Plan does not provide enough protection for street markets in the borough, including in Green Street and East Ham, noting their multiple socio-economic benefits.</p> <p><b>The markets management plan requirement to include sustainability criteria.</b> Climate You Change have suggested that the management plan could address how the space will be used sustainably, with as minimal carbon footprint impact as possible.</p> <p><b>Support for hot food stalls and open food courts in markets through ensuring the infrastructure is in place</b> A resident requested that the policy should ensure that markets have the infrastructure necessary for food courts serving hot food.</p>	<p>Support for the policy is welcomed and we have provided comments the local plan cannot address to our colleagues in the markets department.</p> <p><b>Specific support for existing markets</b> A change to the policy has not been made as the Local Plan protects existing markets and supports establishment of new ones, recognising that they offer more affordable opportunities for small local businesses.</p> <p><b>The markets management plan requirement to include sustainability criteria.</b> This policy implementation has now changed to reflect the opportunity for market operators to promote sustainable business models.</p> <p><b>Support for hot food stalls and open food courts in markets through ensuring the infrastructure is in place</b> This policy has changed to address how markets and pop-up uses should support health and wellbeing and complement policy HS6.</p>
<p>HS5 Visitor Evening and Night Time Economy</p>	<p><b>Neighbourliness vs aspiration for Evening and Night Time Economy growth.</b> A business group asked for clarification of how the policy will apply alongside the requirements for neighbourly development in policy D7. Several residents supported the objective of the policy and have suggested strengthening it to bring forward a vibrant mix of evening and night time</p>	<p><b>Neighbourliness vs aspiration for Evening and Night Time Economy growth</b> This policy has now changed to provide further clarity on the application of Agent of Change to protect the Evening and Night Time Economy Zones function of town centres, including allowing for their growth beyond current provision.</p>



	<p>uses. Three developers also expressed support for the policy.</p> <p><b>Silvertown Local Centre</b> A developer argued that Silvertown Local Centre should be identified as an Evening and Night Time Economy Zone in the policy. The Royal Docks team also suggested that the Royal Docks area would benefit from an Evening and Night Time Economy Zone to support implementation of the Royal Docks Cultural Placemaking Strategy.</p> <p><b>Prescription of preferred location of uses in centres</b> Two developers argued that the direction of different uses towards specific areas (e.g. inside or outside of primary shopping areas) as set out in Table 5 limits the flexibility between the uses.</p>	<p><b>Silvertown Local Centre</b> A change to this policy approach has not been made. An Evening and Night Time Economy Zone for Silvertown Local Centre was considered but not taken forward as it would not align with its designation as a local centre nor does it have sufficient night time public transport.</p> <p><b>Prescription of preferred location of uses in centres</b> This policy approach has now changed to allow for more flexibility.</p>
<p>HS6 Health and wellbeing on the High Street</p>	<p><b>Broad support</b> Many residents continue to raise the issue of over-representation of betting shops and hot food takeaways in the borough, and support measures to restrict them. Residents also asked for bolder action to curate the offer of high streets.</p> <p><b>Green infrastructure</b> Many residents requested that the policy supports the introduction of green infrastructure for its health and wellbeing benefits.</p> <p><b>Application of healthy food standards</b></p>	<p><b>Broad support</b> Policy support is welcomed and we have provided comments on aspects which the Local Plan is unable to deliver to our colleagues in the Public health department.</p> <p><b>Green infrastructure</b> A change to this policy has not been made as the Local Plan addresses this topic through a range of other policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter.</p> <p><b>Application of healthy food standards</b></p>

	<p>A resident has argued that the requirement for accreditation to healthy food standards set by the policy cannot be enforced through planning legislation.</p>	<p>Comment noted. A commitment to improving the quality of food offer is already part of the development plan, through the London Plan (2021) Collaboration across the planning and health teams are underway and will enable conditions to be co-monitored and enforced.</p>
<p>HS7 Delivery-led businesses</p>	<p><b>Broad support</b> Support for the policy was expressed by Transport for London, a resident and two developers. Two residents expressed a need to protect carriers' jobs.</p> <p><b>Preferential location approach</b> A developer argued that requiring delivery led businesses to locate firstly on designated industrial land is unhelpful and does not reflect operational models. Another developer requested that policy support provision also on strategic sites expected to deliver employment uses.</p>	<p><b>Broad support</b> Support for the policy is welcomed.</p> <p><b>Preferential location approach</b> This policy has now changed to clarify the intended approach to the location of delivery-led businesses, which is more flexible than a sequential approach, and to include parts of site allocations expected to deliver employment uses as suitable locations.</p>
<p>HS8 Visitor accommodation</p>	<p><b>Spatial strategy for visitor accommodation.</b> A resident expressed concern that too many bed and breakfasts cause great population churn and should instead be resisted, e.g. on Romford Road. The Royal Docks team suggested that the policy should allow a longer walking distance from ExCeL of 20minutes and to also allow visitor accommodation within a similar distance from London City Airport.</p>	<p><b>Spatial strategy for visitor accommodation</b> A change to this policy has not been made as the policy already seeks to control the location and overall quantum of new visitor accommodation proposals. Further, 15minutes is in keeping with the 15minuted neighbourhood concept that is threaded throughout the Plan. There is no justification to extend this in the case of the ExCel conference centre, while LCY sits within 15min of existing and future local centres, and new visitor accommodation should be directed to these locations in the first instance.</p>

	<p><b>More quality criteria required to manage impacts and to support inclusive design.</b> Residents expressed concern with the quality criteria used to assess a recent hotel scheme, requesting additional attention to impacts on neighbouring uses such as schools. The LLDC recommended that the quality criteria for inclusive design be expanded beyond provision of wheelchair accessible rooms.</p>	<p><b>More quality criteria required to manage impacts and to support inclusive design.</b> This policy implementation has now changed to clarify the need for visitor accommodation uses to consider their amenity and safety impacts and work proactively to mitigate these through the design of the scheme and the operation. The implementation section also now refers to the additional inclusive design guidance provided in policies D1, D2 and D5 (formerly D6), which together address inclusive design standards on private and within public space.</p>
<p><b>Community Facilities</b></p>		
<p>CF1: Existing community facilities and health facilities</p>	<p><b>Support for the provision of community facilities and their protection</b> This policy was broadly supported by residents, Sport England and the Theatre Trust. A number of residents, West Silvertown Foundation and the Theatre Trust highlighted the importance of community facilities; and support for their protection. Community groups and a number of residents highlighted a desire for more social infrastructure, especially to meet the projected population growth.</p> <p><b>Conformity with the National Planning Policy Framework (NPPF)</b> Whilst in general supportive of the policy, Sport England highlighted that part of the policy needed to be amended to ensure it was in conformity with the NPPF and Sport England policy.</p> <p><b>A need for facilities for young / older people and people who are homeless</b> Residents and community groups raised the need for youth clubs and facilities for teenagers. A desire for spaces where young people and adults could mix was also expressed as</p>	<p><b>Support for the provision community facilities and their protection.</b> Support for the policy is welcomed. The Local Plan continues to address the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant site allocations have been updated to reflect the updated evidenced need for community facilities, education and childcare facilities, built leisure facilities and playing pitches.</p> <p><b>Conformity with the National Planning Policy Framework (NPPF)</b> This policy approach has now changed to exclude sporting and informal recreation facilities from the previous exemption at Policy CF1.b (now Policy SI1). The policy has been amended to clarify intent and to ensure it fully aligns with the NPPF and Sport England policy.</p> <p><b>A need for facilities for young / older people and people who are homeless</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Community Facilities chapter continue to protect existing (SI1) and support new</p>

	<p>well as a centre for independent living. The need for facilities for people who are older and those who are homeless was also raised.</p> <p><b>Affordability of community space</b> Residents raised the need more affordable community facilities. The Theatre Trust supported the implementation text criteria which requires prices to reflect rates paid by community groups.</p> <p><b>Safe spaces</b> The Plaistow Assembly wanted the chapter to address the need for safe spaces.</p> <p><b>Quality of evidence base</b> A small number of residents and a community group, questioned the quality of the Community Facilities Needs Assessment (2022), its methodology, scope, approach to consultation and its findings.</p>	<p>spaces (SI2, SI3 &amp; SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of facilities which young people and adults may use. The policy also continues to protect and deliver of facilities which people who are homeless may use. The delivery of specific facilities is the responsibility of other parts of the council and the community and voluntary sector.</p> <p><b>Affordability of community space</b> A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 and SI3 continues to set out the requirement for community facilities to undertake a Social Value-Health Impact Assessment (Policy BFN3) and that facilities should enter into a Community Use Agreement. This is to ensure the long-term use and affordability of facilities.</p> <p><b>Safe spaces</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the creation of safe spaces is addressed in the Local Plan's design policies.</p> <p><b>Quality of evidence base</b> This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. The Assessment has sought to better understand, protect and to guide the future development of Newham's social infrastructure. We have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the</p>
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		<p>Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2023), Playing Pitch Strategy (2023), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>
<p>CF2: New and re-provided community facilities and health facilities</p>	<p><b>General support</b> This policy was broadly supported by residents, developers and Sport England.</p> <p><b>A need for more community facilities, social gathering places and health facilities</b> Residents and one community group raised the need for more community facilities, social gathering spaces and health facilities.</p> <p><b>Town-centre first approach to the location of new social infrastructure</b> The City of London raised concerns about the location of new community facilities smaller than 1,000 sqm GIA. One developer suggested the policy needed to be more flexible to allow provision of community facilities outside of a town centre, to support the delivery of 15 minute neighbourhoods. Concerns about the inability of the voluntary sector to access town centre community space was also raised by one resident.</p> <p><b>Affordability and quality of community space</b></p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>A need for more community facilities, social gathering places and health facilities</b> The Neighbourhood chapter and relevant site allocations have been updated to reflect the need for community facilities, education facilities and childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Plan period. Policy SI2.7 continues to include the provision for community facilities to enter into a Community Use Agreement, to make sure the space continues to meet the needs of its users.</p> <p><b>Town-centre first approach to the location of new social infrastructure</b> This policy approach has now changed to allow greater flexibility to the location of small scale social infrastructure (smaller than 1,000 sqm GIA).</p> <p><b>Affordability of community space</b></p>

	<p>Two residents and a community group raised the need for affordable community facilities. A lack of good quality affordable space for rent or lease from Newham Council was also raised. The Theatre Trust supported the implementation text criteria which requires prices to reflect rates paid by community groups.</p> <p><b>How will social infrastructure be delivered?</b> One community group requested that there be clarity on how social infrastructure will be delivered.</p> <p><b>Burial space</b> One neighbouring borough raised concerns that the Local Plan did not address the need for burial space.</p> <p><b>Greater focus on the voluntary sector and places of worship</b> One community group and two residents noted a lack of direct references to the voluntary community and faith sector in the chapter.</p>	<p>This policy approach has now changed to provide better guidance on what we consider an affordable and good quality community space to be. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Policy BFN3). This assessment will include an understanding of the affordability of a premises for its intended users. We will pass this feedback regarding the affordability of LBN meeting rooms on to Newham's Resident Engagement and Participation team since this is not something the Local Plan can address.</p> <p><b>How will social infrastructure be delivered?</b> This policy approach has changed following the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). These studies supplement the Community Facilities Needs Assessment (2022). Please see the New wording is now included in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements for social infrastructure.</p> <p><b>Burial space</b> A new burial space policy has been added to the Plan. Newham is actively working on its approach to addressing the need for burial space, including discussions with neighbouring boroughs.</p> <p><b>Greater focus on places of worship</b> The term community facility used in the Local Plan encompasses places of worship and many of the facilities run by the voluntary and charity sector. The rationale for improving the protection of these spaces and flexibility of where they can be located is based on our understanding of their importance to residents.</p> <p><b>Public toilets / cycle storage</b></p>
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	<p><b>Public toilets / cycle storage</b> Residents and community groups raised the need for more public toilets and for there to be cycle storage at community facilities. One developer asked for greater clarity around the provision of public toilets and at what scale of development are they expected.</p> <p><b>Swap shop / exchange centres / community fridges</b> Residents and one community group raised the need for spaces where people can exchange unwanted items and wanted provision of community fridges.</p> <p><b>Co-design of social infrastructure</b> Residents raised the need to ensure all age groups are included in the planning of community facilities. One community group requested greater clarity on how and when developers engage with the community when consulting on their plans.</p> <p><b>Speculative community facilities</b> One developer raised a concern that Policy CF2 (now SI2) sought to resist speculative development. Conversely, one community group wished to see operators identified and secured as part of the early design of schemes.</p>	<p>A reference to a threshold for the provision of public toilets has been added to the policy. The policy approach has also changed to ensure better alignment with London Plan Policy S6. With regard to cycle storage, this policy now directs the reader to the transport policies.</p> <p><b>Swap shop / exchange centres / community fridges</b> A change to this policy approach has not been made as the implementation for Policy SI2 provides further guidance, including the provision of kitchen and food storage spaces. In addition, Policy W3 requires the provision of re-use and circular economy rooms in large developments to aid residents to share and donate items.</p> <p><b>Co-design of social infrastructure</b> This policy approach has now changed to ensure we are being clear about our expectations of the co-design process. This includes the need to speak with and consider the needs of different age groups. We have also provided greater clarity on the studies applicants should consult and the requirement to engage with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</p> <p><b>Speculative community facilities</b> A change to this policy approach has not been made as the Community Facilities Needs Assessment (2022) and the consultation undertaken with community groups as part of this work, has highlighted the downside of providing speculative community space. We do not wish to see vacant space or facilities which have been designed without considering the end user.</p>
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<p>CF3: Cultural facilities and sport and leisure recreation facilities</p>	<p><b>General support</b> This policy was broadly supported by residents, the City of London, Sport England and the Theatre Trust. The Theatre Trust highlighted that the policy provides strong protection for Newham’s valued cultural venues.</p> <p><b>Built Leisure Needs Assessment and Playing Pitch Strategy</b> Sport England raised the need for the completion of both the Built Leisure Needs Assessment and the Playing Pitch Strategy. This work is needed to ensure that a robust and up-to-date evidence base informs and supports Policy CF3 (now SI3). Sport England requested that the Neighbourhood chapter and site allocations in the Local Plan reflect the findings of the evidence base documents.</p> <p><b>Protection of sport and informal recreation facilities</b> Sport England was concerned that sites would only be protected if viable which is different to being needed.</p> <p><b>Need for sport and informal recreation and cultural facilities</b> Residents raised the need to deliver sport and informal recreation facilities and cultural facilities to meet the project growth in housing. A number of residents raised the need for more leisure centres, fitness and gym facilities.</p> <p><b>Affordability of space</b> The Theatre Trust supports the criteria in the implementation text which requires prices to reflect rates</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Built Leisure Needs Assessment and Playing Pitch Strategy</b> This evidence base has been refined and finalised and both have informed the latest requirements for facilities which are set out in the neighbourhood policies and site allocations.</p> <p><b>Protection of sport and informal recreation facilities</b> This wording change has been made which now aligns with the wording in the NPPF.</p> <p><b>Need for sport and informal recreation facilities</b> These policies already protect existing community facilities and supports new facilities However, the Neighbourhood chapter and relevant site allocations have been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches.</p> <p><b>Affordability of space</b> This policy approach has now changed to provide better guidance on what we consider an affordable space to be. In addition, Policy SI2 continues to require proposals for all new and re-provided (including</p>
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	<p>paid by community groups. One resident raised the need for more affordable cultural spaces.</p> <p><b>Lee Valley Regional Park</b> The Lee Valley Regional Park Authority proposed amendments to ensure the Local Plan supports the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley Velo Park and Three Mills Island.</p>	<p>modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.</p> <p><b>Lee Valley Regional Park</b> Wording changes have been made across the policies in this chapter to support the Lee Valley Regional Park.</p>
<p>CF4: Education and childcare facilities</p>	<p><b>Meeting the need for education space</b> One developer stressed the importance of education and childcare facilities needing to be based on an up-to-date needs assessment and suggested a wording change to Policy CF4 (now S14).</p> <p><b>More flexibility required to meet the need for education space</b> The Department for Education considered that Policy CE4.2 (now S14) failed to provide flexibility and that it should allow for education to be delivered on windfall sites.</p> <p><b>Increasing capacity at existing education facilities</b></p>	<p><b>Meeting the need for education space</b> We have made a wording change to Policy S14 to reflect the requirement for applicants, on sites where a school is required to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered at the right time. The Places for All Strategy (2022) and our work with Newham’s Education department have informed our approach to education requirements on site allocations. In response to this evidence of need, the Regulation 19 approach remains the same in respect of the sites being allocated for primary, secondary and SEND education.</p> <p><b>More flexibility required to meet the need for education space</b> A change to this policy approach has not been made as Policy S14.1.c already considers the issue of windfall education sites.</p> <p><b>Increasing capacity at existing education facilities</b></p>

	<p>The Department for Education recommended the policy make specific reference to the requirement for developer contributions to increase the capacity of existing schools and the provision of new schools.</p> <p><b>Pupil Yield Modelling</b> A community group questioned the pupil yield model and its accuracy. The same community group raised concerns about the child yield model and the GLA School Roll projection.</p> <p><b>Design of education space</b> One community group suggested the policy needed to be clearer and wanted the policy to allow for the future growth / reduction of schools. The same community group wanted the site allocations to specify the size of the space given to a school. The Department of Education requested land to be safeguarded for future school expansion and for the inclusion of details such as phasing and minimum site area. However, it also noted that while it is important to provide clarity, the policy also needed to provide a degree of flexibility about site specific requirements.</p> <p><b>Access to green space</b> Residents and one community group raised the importance of providing green space within education settings. The community group asked for the policy to define a set amount of green space to be delivered.</p> <p><b>Sharing of facilities with the wider community</b></p>	<p>This policy approach has now changed to reflect that the specific requirements for developer contributions for education contributions will be confirmed at application stage.</p> <p><b>Pupil Yield Modelling</b> No changes have been made as a result of these comments as the model is considered to be robust and as accurate as possible. To reflect the need to remain responsive, Policy SI4 requires developers to engage with the Council’s education department at the point of delivery to ensure the right size school is delivered at the right time.</p> <p><b>Design of education space</b> A change to this policy approach has not been made as the design requirements of individual school sites will need to be assessed at the point of application and the policy already makes provision for the need for a flexible design to allow for future growth.</p> <p><b>Access to green space</b> A change to this policy approach has not been made as the policy already makes provision for the need to education facilities have access to outdoor green and play spaces and to ideally be located within a 15-minute walking distance of a park.</p> <p><b>Sharing of facilities with the wider community</b> Support for the policy is welcomed. However, the policy approach has now changed to ensure the ambition of securing shared use of</p>
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	<p>Sport England and residents supported the shared use of education facilities by the wider community. One community group wanted the policy to provide further explanation on the sharing of facilities with the wider community. The same community group questioned if and how shared space in education settings would be deliverable / viable.</p>	<p>education spaces is deliverable. Policy SI4 now includes the requirement for applications where these is shared use of education facilities to enter into a Community Use Agreement.</p>
<p><b>Inclusive Economy</b></p>		
<p>J1 Employment and growth</p>	<p><b>General Support</b>  This policy is broadly supported by the City of London, the Port of London Authority (PLA), the Greater London Authority (GLA), the London Legacy Development Corporation (LLDC) and a number of developers. In particular, London City Airport, the PLA and some developers indicated support for the policy approach on Thameside West Strategic Industrial Land (SIL), Thameside East SIL, Rick Roberts Way North Local Industrial Location (LIL), Albert Island LIL and Ashburton Terrace Local Mixed Use Area.</p> <p><b>Approach to office space</b>  The GLA supported the general policy approach and considered it in line with the London Plan. A developer is supportive of the approach to direct major offices to Stratford Metropolitan Centre but recommended extending the use to research and development. A developer requested greater flexibility to allow the delivery of office floorspace in proximity to Stratford Metropolitan Centre. A developer requested further clarification on the evidence base on supply.</p>	<p><b>General Support</b>  Support for the policy is welcomed.</p> <p><b>Approach to office space</b>  A wording change has been made to allow research and development floorspace in Stratford Metropolitan Centre. No changes have been made to allow office floorspace around Stratford Metropolitan Centre as the town centre first approach is supported by the Employment Land Review (2022) which outlines that there is an oversupply of office floorspace in the borough. Detailed evidence for office needs and supply are set out in the Employment Land Review (2022).</p>

<p><b>Approach to industrial land</b> The general policy approach to industrial land is broadly supported by the GLA, the PLA and many developers. However, the GLA requested greater clarity regarding where new industrial land would be delivered. Some developers requested for greater clarity for the approach in site allocations and one of them objected the delivery of industrial use in site allocations.</p> <p><b>Industrial and residential buffering</b> A developer supported the buffering approach but suggested adding more detail requirements to protect industrial uses.</p> <p><b>Revision of employment designation boundaries</b> Some developers requested changes to the boundaries of employment designations, such as expanding London Industrial Park SIL to Beckton Alps and releasing parts of Thameside West SIL to allow residential uses in the approved scheme and Mayer Parry Wharf to be redesignated from LMUA back to SIL.</p> <p><b>Allowing sports facilities in designated employment locations</b> Sport England recommended adding sports facilities into employment land as they also generate employment opportunities.</p> <p><b>Allowing residential use on employment land</b></p>	<p><b>Approach to industrial land</b> Changes have been made in Local Plan Policies J1 and J2 to better reference the London Plan and to provide clarity on the approach to deliver industrial uses in site allocations, including a list of specific site allocations for such delivery. No changes have been made in response to the objection to industrial floorspace provision in site allocations as we require industrial land to be delivered on site allocations where they were created through managed release on Strategic Industrial Locations (SILs) in the adopted Local Plan to protect some of the lost capacity, or where they will function as a buffer between industrial land and residential neighbourhoods.</p> <p><b>Industrial and residential buffering</b> Additional details have been added in Local Plan Policy J1 and D6, and relevant site allocations to provide greater clarity on the existing buffering approach.</p> <p><b>Revision of employment designation boundaries</b> No changes have been made to the boundaries as the proposed boundaries are supported by our evidence base and remain necessary to achieve and balance the Plan’s objectives regarding the protection of open space and delivery of sufficient industrial capacity.</p> <p><b>Allowing sports facilities in designated employment locations</b> This change has not been made as the Local Plan adopts an evidenced approach, which aligns with transport and town centre policies, to deliver new leisure facilities to meet the needs as informed by the Built Leisure Needs Assessment (2024).</p> <p><b>Allowing residential use on employment land</b></p>
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	<p>The LLDC and a number of developers requested to allow residential uses at Bow Goods Yard SIL, Beckton Riverside SIL and Cook’s Road LIL, and to allow residential-led development at Beeby Road LMUA.</p> <p><b>Allowing ancillary uses in Land East of London City Airport</b> The London City Airport suggested changes in policy to allow the site to deliver research and training use as an aviation centre of excellence.</p> <p><b>Requirement for economic strategy submission requirement</b> One developer raised concern that the Economic Strategy requirement to be applied for all developments will limit investment in the borough.</p>	<p>No changes are proposed to the SILs and LMUAs, noting that residential development is allowed within LMUAs so long as the employment uses are re-provided on site. For the SILs, these sites are designated for industrial intensification which follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough, including those sites previously within the LLDC’s planning remit. Cook’s Road is changing from LIL to LMUA, as recommended by the Employment Land Review, to allow the permitted residential uses (which is under implementation) to come forward Fo</p> <p><b>Allowing ancillary uses in Land East of London City Airport</b> This wording change has been made to allow such provision.</p> <p><b>Requirement for economic strategy submission requirement</b> Wording change has been made to provide greater clarity on the requirement including threshold and scope of the Economic Strategy.</p>
<p>J2 New employment floorspace</p>	<p><b>General Support</b> This policy is strongly supported by the City of London and developers.</p> <p><b>Intensification of industrial uses</b> A developer supported the intensification approach but raised deliverability concerns and requested greater</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Intensification of industrial uses</b> This change has not been made as the Employment Land Review (2022) indicates that the pipeline supply of industrial land is not sufficient to meet need. As such, the Local Plan requires industrial development in</p>

	<p>flexibility in case uses cannot be intensified on SILs and LILs.</p> <p><b>Allowing employment floorspace outside designated locations</b> A developer suggested further flexibility for the delivery of employment space outside of designated employment locations.</p> <p><b>Sequential test and impact assessment</b> One developer objected to the requirements to submit sequential test and impact assessment for office spaces outside town centres and Micro Business Opportunities Areas.</p> <p><b>Employment floorspace to support green economy</b> A community group suggested a list of measures to support green industries including the offering affordable workspaces for green industries.</p>	<p>both SILs and LILs have to take the form of intensification to deliver further industrial floorspace. There is already sufficient flexibility within the policy for alternative approaches when intensification cannot be delivered.</p> <p><b>Allowing employment floorspace outside designated locations</b> No changes have been made as the flexibility to deliver employment uses outside the designated areas or site allocations is allowed subject to requirements to bring economic benefit to the local community. We consider this provides sufficient flexibility, acknowledging the need for alternative priority land uses, including housing and the economic benefits of ensuring there is a sufficient, but not oversupply of employment land.</p> <p><b>Sequential test and impact assessment</b> This change has not been made as the town centre first approach is supported by the Employment Land Review (2022) as there is oversupply of office floorspace in the borough and the sequential test and impact assessment requirement is to ensure the vitality and viability of town centres. This approach is in conformity with the London Plan.</p> <p><b>Employment floorspace to support green economy</b> No changes have been made as all developments incorporating employment floorspace are required to support transition to a greener economy.</p>
<p>J3 Protecting employment floorspace</p>	<p><b>General Support</b> This policy is supported by the City of London and developers.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p>

	<p><b>No net loss of industrial land</b>  A developer strongly supported this approach to SILs and LILs but suggested this requirement applies to land instead of floorspace to avoid loss of yard space provision. One developer requested the removal of the no net loss requirement due to inconsistency with the London Plan. One developer objected to the requirement for no net loss of industrial floorspace in LMUAs.</p> <p><b>Clarity of requirements for various designations</b>  Developers requested greater clarity to the application of the no net loss approach, the requirement to submit marketing evidence and 15-minute mapping to justify loss of employment floorspace across employment designations and site allocations.</p>	<p><b>No net loss of industrial land</b>  These changes have not been made as the Employment Land Review (2022) indicates that the pipeline supply of industrial land is not sufficient to meet need and highlights Newham's important strategic role as a key industrial property market area and in close proximity to the Central Activity Zone. As such, the Local Plan requires industrial development in all SILs, LILs and LMUAs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. The GLA has indicated they are supportive of this approach (see their representations). Also, the policy is clear that industrial intensification in capacity also includes yard space.</p> <p><b>Clarity of requirements for various designations</b>  The requirement to submit marketing evidence and 15-minute mapping for proposals which result in loss of employment floorspace on site allocations are now removed in recognition that these sites have been subject to an allocation process. More clarity is added in the policy on the approach to no net loss on different employment designations, town centres, site allocations and non-designated sites.</p>
<p>J4 Delivering Community Wealth Building and Inclusive Growth</p>	<p><b>General Support</b>  This policy is broadly supported by developers, City of London and a community group.</p> <p><b>Developer contributions on local training and employment</b>  A number of developers requested greater flexibility with regards to the requirement for contributions to local</p>	<p><b>General Support</b>  Support for the policy is welcomed.</p> <p><b>Developer contributions on local training and employment</b>  No changes have been made to this approach. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local</p>



	<p>training and employment, and questioned on the viability of this requirement.</p> <p><b>Enhancing local employment quantity and quality</b> Residents suggested further requirements to improve local employment such as suggesting the council commission local services, attract local entrepreneurs and big companies by offering low rents, providing training courses, supporting apprenticeships, prioritising employment for low income families and long term residents. Residents also suggested adding details on healthy workplace and job discriminations.</p> <p><b>Green economic growth</b> One resident and developers supported the recognition of green economy in the policy but requested greater clarity on the meaning of green technology and industries.</p> <p><b>Other requirements</b> One developer requested greater flexibility on the requirement of childcare facilities while another developer questioned the viability of affordable workspace provision requirement.</p>	<p>residents and deliver our inclusive Economy objectives. This approach was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p><b>Enhancing local employment quantity and quality</b> No changes have been made as the policy has already set out a list of comprehensive requirements to achieve the policy aim in creating high quality economic opportunities to support community wealth building for all local residents And further suggestions are not deliverable via planning policy.</p> <p><b>Green economic growth</b> Definitions have been added in the Glossary.</p> <p><b>Other requirements</b> No changes have been made as the level of flexibility is considered appropriate in the policy. Childcare facilities will only be required where the additional need cannot be meet by existing provisions while provision of new affordable workspace is not a compulsory requirement.</p>
<b>Homes</b>		
H1 Meeting housing needs	Developers and the GLA raised concerns that Newham was unable to meet its housing target in the London Plan, and whether there was insufficient flexibility in other policies that impact our housing delivery (for example, tall buildings, employment and family housing policies being too restrictive and negatively impacting viability).	We have updated our housing target, following updates to the designed capacity testing of a number of sites, including two new site allocations identified through comments on the draft Regulation 18 Local Plan. We have also moved on the start date for our housing target by one year, to reflect the housing completions recorded for financial year 2022/23.

		<p>No further policy flexibility is considered necessary. While we are still unable to meet our London Plan housing target, primarily due to delays in site delivery, we have sought to optimise housing delivery in line with the London Plan’s design-led approach while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Further information is outlined in the Site Capacity and Housing Trajectory Methodology Note</p>
<p>H2 Protecting and improving existing housing</p>	<p><b>Family housing protections</b> Residents supported the protection of family-sized homes. A landlord felt the policy should be more flexible on allowing more accommodation for sharers.</p> <p><b>Repairs</b> Some residents raised the difficulties they had faced in getting repairs to their homes and advocated for faster repairs in the borough.</p>	<p><b>Family housing protections</b> We have retained the policies protecting family housing, and allowing for subdivisions or conversions in exceptional circumstances.</p> <p><b>Repairs</b> We have not amended our policy approach as repairs and improvement works often don't require planning permission. Where repairs and improvement works or conversions require planning permission, proposals will be expected to meet the relevant quality requirements of the Local Plan, including Policy H11 requirements around housing design quality.</p>
<p>H3 Affordable housing</p>	<p><b>Affordable housing targets</b> While developers were broadly supportive of adopting the London Plan’s threshold approach to affordable housing delivery, they considered the affordable housing targets in the Plan were unlikely to be deliverable in all contexts due to viability challenges. Residents stated that the delivery of truly affordable housing and particularly social rent housing was extremely important and key to ensure the borough remained liveable for a range of residents. Councillors felt that the borough should deliver 50 percent</p>	<p><b>Affordable housing targets</b> Our affordable housing targets have now changed to require new residential developments on sites delivering ten dwellings or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. All social rent homes delivered in the borough will be allocated to people on Newham's housing waiting list.</p>

	<p>of all new housing as social rent homes, and these should help to house those in temporary accommodation.</p> <p><b>In-house viability advice</b> Some residents felt it was important to appoint in-house viability expertise. Councillors felt that the Council should robustly scrutinise viability assessments, and consider new models of viability that could help deliver more affordable homes.</p> <p><b>Approach to gasholder sites</b> A developer wanted the borough to clarify that gasholder sites could follow the threshold approach where they deliver 35% affordable housing.</p>	<p><b>In-house viability advice</b> No change has been made to the policy approach as the policy already requires independent scrutiny and does not specify who this is undertaken by. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. Given very significant restrictions of grant available currently from central government to fund affordable housing, we did not consider alternative viability models would be successful at delivering more affordable homes.</p> <p><b>Approach to gasholder sites</b> Due to the change to affordable housing targets, there is no variation in affordable housing delivery requirements according to land use in the revised wording for Policy H3.</p>
H4 Housing mix	<p><b>Family housing targets</b> Residents showed broad support for the delivery of more family-sized homes, particularly where these were affordable. Councillors felt our family housing target should be more ambitious. Developers felt targets for the delivery of family-sized homes, including homes with four or more bedrooms on site allocations would have a disproportionately negative impact on viability. Developers and the GLA felt the policy should be more flexible in allowing developments to follow the fast track route even where there was a shortfall against family housing targets.</p>	<p><b>Family Housing targets</b> Newham’s family housing target has not been amended. We did not consider a change to the target to be appropriate as Newham’s latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough’s most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>

	<p><b>One bedroom and studio unit policies</b>          Developers felt the policy was over restrictive in its requirements around delivering one bedroom and studio units. Developers felt that smaller units should be recognised for their role in freeing up family housing. Their delivery should be prioritised near town centres, in opportunity areas and highly accessible locations. They should also be prioritised in build to rent schemes and specialist housing for older people.</p> <p><b>Portfolio approaches</b>          Developers and the LLDC wanted further clarity on the acceptability of securing portfolio approaches to the delivery of affordable and family housing.</p>	<p><b>One bedroom and studio unit policies</b>          This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Our target for no more than 15 per cent one-bedroom homes on major developments has not been amended, as this target has been informed by evidence of housing needs.</p> <p><b>Portfolio approaches</b>          Policy H4 now includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Developments within a portfolio delivering additional affordable housing and/or family homes should be located in Newham, and completed and ready for occupation prior to developments that deliver) below the policy target(s).</p>
<p>H5 Build to Rent housing</p>	<p><b>Resident views on build to rent</b>          Residents provided mixed feedback on the policy. While there was support for the policy, some residents were concerned about the delivery of private rented sector homes, in particular because they seemed less affordable.</p> <p><b>Affordable housing for Build to Rent</b>          While developers supported the inclusion of a standalone policy on build to rent housing, they opposed the affordable housing requirements in the Local Plan, suggesting instead they should reflect the wording of the London Plan. Some developers also raised concerns on the</p>	<p><b>Resident views on build to rent</b>          We note the concerns related to the affordability of rented homes. Our policy approach for affordable housing delivery on these schemes has now changed to reflect our updated affordable housing target in H3. This will help to deliver a greater proportion of build to rent affordable homes at London Affordable Rent levels.</p> <p><b>Affordable housing for Build to Rent</b>          Our affordable housing target for Build to Rent homes is based on our evidence of housing needs. As such, our Build to Rent target has been changed to reflect the tenure split of our affordable housing target set out within policy H3. Dual viability assessment requirements have been</p>

	<p>requirements for a dual viability assessment, comparing for sale and for rent scheme outcomes.</p> <p><b>Housing mix and build to rent</b> Developers felt that Build to Rent schemes should be subject to more flexible policies around housing mix, as take up of units to date has been mainly of one and two bedroom homes.</p> <p><b>Revenue subsidy</b> The Greater London Authority raised concerns about whether the requirement for payments into a revenue subsidy fund where affordable housing targets could not be met remained appropriate.</p>	<p>retained as they allow officers to transparently compare the viability impacts of build for sale vs build to rent.</p> <p><b>Housing mix and build to rent</b> We did not consider this change to be appropriate as our evidence of housing needs demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p> <p><b>Revenue subsidy</b> This requirement in the policy has now been removed.</p>
<p>H6 Supported and specialist housing</p>	<p><b>Resident views on specialist housing</b> Residents broadly supported the policy, and stressed the importance of delivering homes to meet the needs of people with support needs.</p> <p><b>Local need for accommodation</b> Providers and developers of specialist accommodation felt it was important that provision was supported where it was needed and in accessible locations. One developer raised concerns on the local occupancy requirement in the policy. They also considered that accommodation should be supported where residents required much lower levels of care or weren't directly commissioned by the Council.</p> <p><b>Loss of specialist housing</b></p>	<p><b>Resident views on specialist housing</b> Support for the policy is welcome.</p> <p><b>Local need for accommodation</b> Policy clauses around local need (as defined and determined by Newham commissioning teams) have been retained, recognising the need to balance the delivery of needed specialist and supported accommodation with general needs housing..</p> <p><b>Loss of specialist housing</b> This policy approach has now changed to include an additional option for the release of specialist accommodation. This involves</p>

	<p>A developer felt the policy should be more flexible, requiring less strict criteria for the release of accommodation.</p>	<p>accommodation being offered to commissioning teams. If commissioning teams consider the existing accommodation provision is not needed locally, then accommodation can be lost to other residential uses.</p>
<p>H7 Housing for older people</p>	<p><b>Resident views on accommodation for older people</b> Residents broadly supported the requirements set out in the policy, and the delivery of more accommodation for older people.</p> <p><b>Definition of older people’s accommodation</b> A developer considered that accommodation for older people wasn’t clearly defined in the policy.</p> <p><b>Requirements being too restrictive</b> A developer felt the policy requirements were too restrictive, including requirements around affordable housing, local need for the accommodation, location requirements and provision of main town centre uses.</p> <p><b>Design requirements</b> A developer raised that older persons accommodation that isn’t assessed by the Care Quality Commission should be subject to different design requirements</p>	<p><b>Resident views on accommodation for older people</b> Support for the policy is welcomed.</p> <p><b>Definition of older people’s accommodation</b> The wording of Policy H7 now clarifies that policies H6 and H7 apply to those forms of older-persons housing where care is provided (sheltered housing, extra care and care homes). Age-restricted general market housing should be assessed against policy requirements applied to general needs housing, including affordable housing and housing mix requirements.</p> <p><b>Requirements being too restrictive</b> Policy H7 has now changed to further clarify those forms of specialist accommodation for older people most needed in the borough. of the requirement for accommodation to be close to town centres has now been softened to exempt care home accommodation from this requirement, and remove the requirement for accommodation to be located on major roads. This policy also now clarifies that the provision of community facilities in developments for older residents is encouraged, rather than compulsory to deliver.</p> <p><b>Design requirements</b> This policy approach has now changed to allow for assessment against HAPPI principles where accommodation for older people is not regulated by the Care Quality Commission.</p>

<p>H8 Purpose-built student accommodation</p>	<p><b>Restrictive requirements</b> Residents broadly supported the policy and restricting Purpose build student accommodation. Developers felt the policy was too restrictive, particularly requirements limiting additional delivery of purpose-built student accommodation in Stratford and Maryland and requirements for nominations agreements with Newham-based campuses.</p> <p><b>Community facilities requirement</b> Developer’s felt developments shouldn't have to provide community facilities to reduce impact on nearby centres.</p> <p><b>Affordability</b> Some residents recommended purpose built student accommodation delivery be restricted and made more affordable</p>	<p><b>Restrictive requirements</b> This policy approach has now changed to explicitly support delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or, where developments would create an oversaturation of purpose built student accommodation delivery, only where adjacent to existing campuses. The policy now also provides more flexibility for higher education providers to sign up to nominations agreements, albeit additional requirements apply where developments would result in an over-concentration of student bed spaces.</p> <p><b>Community facilities requirement</b> This policy approach has now changed to reflect that the objective of this policy is to relieve pressures on local public spaces for study (such as libraries) and gyms.</p> <p><b>Affordability</b> Policy H8 affordable housing requirements have been updated to require at least 60 per cent affordable student accommodation.</p>
<p>H9 Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living</p>	<p><b>Support and opposition to delivering more houses in multiple occupation</b> Residents and developers had mixed views on the delivery of houses in multiple occupation, with some feeling the policy was too restrictive. Other residents felt the delivery of houses in multiple occupation should be controlled given their amenity impacts.</p>	<p><b>Support and opposition to delivering more houses in multiple occupation</b> The policy position has remained broadly similar, recognising there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents, while also balancing their delivery against the much higher need for family homes. In the majority of cases therefore, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation. More intensely occupied larger houses in multiple</p>

	<p><b>Rent caps</b> Residents supported the rent caps proposed by the policy for houses in multiple occupation.</p> <p><b>Payments in lieu</b> Developers objected to the payment in lieu requirements when affordable housing isn't provided on site, being higher than those in the London Plan.</p>	<p>occupation will be directed to Town and Local Centres and along nearby major roads, so residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing.</p> <p><b>Rent caps</b> While support for the policy was noted, this policy approach has now changed to apply the requirement for rents to be capped at Local Housing Allowance Shared Accommodation rates only to those homes secured for Newham Care Leavers and single homeless people. This is due to this requirement being too onerous to deliver via a legal agreement.</p> <p><b>Payment in lieu</b> The policy position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall.</p>
H10 Gypsy and traveller accommodation	Residents felt the Council should be providing more pitches to meet the needs of the Gypsy and Traveller community	This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to national legislation. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme, which is reviewing how best to use a range of small areas of land in the Council ownership.
H11 Housing Design Quality	<p><b>Detailed policy requirements</b> Residents broadly supported the policy requirements, with Councillors also supporting better quality space standards.</p>	<p><b>Detailed policy requirements</b></p>



	<p>Developers raised concerns around a number of clauses in the policy, saying these were too detailed for a Local Plan policy, and were more akin to Supplementary Planning Guidance.</p> <p><b>Housing adaptations for people without a physical disability</b> A charity felt that design requirements should consider the cultural needs of residents and the needs of neurodivergent people or people with learning difficulties.</p> <p><b>Membership model</b> Developers questioned the legal basis for requirements around on-site services and facilities needing to be provided via a membership model, available to all residents at an equivalent cost of using a Council facility.</p> <p><b>Portfolio approach</b> Developers sought additional flexibility on providing wheelchair adapted properties through a portfolio approach.</p>	<p>This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording.</p> <p><b>Housing adaptations for people without a physical disability</b> A new policy clause has been added that requires developments referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham’s forthcoming ‘Housing design needs study’. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham’s housing waiting list.</p> <p><b>Membership model</b> This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented.</p> <p><b>Portfolio approach</b> We have retained the portfolio approach wording, requiring developments delivering additional adapted homes to be completed and ready for occupation prior to developments that deliver wheelchair user dwellings below the policy target. This is to ensure development portfolios do not result in an under delivery of wheelchair adapted homes against policy targets.</p>
<b>Green and Water Spaces</b>		
GWS1 Green spaces	<p><b>General support</b> Residents, the GLA, Environment Agency, Natural England, Sport England, London Historic Parks and Gardens, the</p>	<p><b>General support</b> Support for the policy is welcomed.</p>

<p>Woodland Trust, City of London, Lee Valley Regional Park Authority, the London Legacy Development Corporation and a number of developers broadly supported the comprehensive approach taken in this policy. Support for the crossover with other Local Plan policies regarding climate change, air quality, biodiversity and SuDs was also recognised.</p> <p><b>Definition of green space</b> Two developers disputed the definition of green space / open space in the Local Plan.</p> <p><b>Protecting green space</b> Residents and one community group highlighted the many benefits green space brings to their lives and the importance of providing space for nature. The importance of green space in helping provide resilience to climate change was also raised. The Environment Agency and CPRE supported the approach to the protection of green space. A few developers objected to the policy, stating it was too restrictive.</p> <p><b>Delivering new green space</b> Residents expressed a strong desire for more green space to meet the projected population growth. There is also a need for multifunctional space which is of a reasonable size. Two developers, one community group, the Royal Docks Team and the London Legacy Development Corporation disputed site specific green space allocations.</p>	<p><b>Definition of green/open space</b> This policy approach has now changed to ensure the definition of green space provided is clear and aligns with both the London Plan and NPPF.</p> <p><b>Protecting green space</b> The policy continues to protect and improve Newham's green spaces. The borough currently experiences shortfalls in publicly accessible green space, areas for community and food growing and play space. However, the policy does include exceptional circumstances which could be met in order to develop on green space.</p> <p><b>Delivering new green space</b> Newham's Green and Water Infrastructure Study (2024) is the evidence base which supports our policy approach to the borough's green, water, access to nature, play and growing space needs. This evidence has informed the latest requirements for green space set out in the site allocations. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing.</p>
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	<p><b>Improving existing green space</b> Residents supported the desire to improve existing green space, with strong aspirations to see the quality of green spaces improved. This included improvements to biodiversity and provision of play space and informal recreation activities. The Environment Agency supported the approach taken to support the delivery of multifunctional green space.</p> <p><b>Exceptional circumstances for building on green space</b> One community group disputed the use of the 'exceptional circumstance' test for any development on green space which, it stated, should only be used in respect of Metropolitan Open Land and the Green Belt. One community group expressed concern that the clause would lead to the loss of green space and harm to biodiversity. The CPRE wanted to see the list of exceptions substantially reduced. One developer requested greater flexibility to ensure the policy did not compromise the viability of a development. One developer disputed the exceptional circumstances in policy, stating that the clause should not exclude Metropolitan Open Land.</p> <p><b>Newham publicly accessible green space standard</b> The GLA supports the development of a 'Newham Open Space standard' on a per population basis. There was a strong desire from residents, community groups, the CPRE and London Historic Gardens Trust for the policy to be more ambitious about the provision of publicly accessible green space per head of population.</p>	<p><b>Improving existing green space</b> Support noted. The policies in the Green and Water Spaces chapter continue to highlight the importance of multifunctional green space and seek to protect and improve the quality of Newham's green space assets.</p> <p><b>Exceptional circumstances for building on green space</b> We have not changed this policy as it continues to protect green space, while providing clear and very limited criteria where, in exceptional circumstances, development on green space would supported. To be allowed, the proposed development would need to deliver a benefit to those living in Newham and improve the use and quality of the green space. The policy also clearly states there must be no detriment to the natural environment.</p> <p><b>Newham publicly accessible green space standard</b> We have not made a change to the standard, as this was created using up-to-date evidence to support this chapter and its targets. Given the projected population increase, it is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p>
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<p><b>Improved connectivity / access to green space</b> Residents, the Woodland Trust, the Environment Agency, the Canal and River Trust, Lee Valley Regional Park, City of London and two developers supported the approach to improving green space connections for the benefit of people and wildlife. Residents highlighted the virtues of the Greenway and wanted to see further investment in this space. They also wanted to see improvements to access in the east of the borough and along the River Roding. Residents raised the need to improve the biodiversity of incidental spaces, streets and footpaths to deliver improvements to green space links.</p> <p><b>Approach to Metropolitan Open Land / Green Belt</b> Thames Water and a number of developers with sites containing Metropolitan Open Land objected to and sought to delete the designation. The CPRE requested the retention of the Beckton Sewage Works Metropolitan Open Land designation.</p> <p><b>Management of new green space</b> Developers and the City of London expressed concern with clause five of the policy. The clause includes the ability for the Council to have ownership of new green space on site allocations and new green space which will function as a local park. One developer broadly welcomed this clause.</p> <p><b>Maintenance of green space</b> Residents raised the need for green spaces in the borough to be properly maintained, the issue of litter was frequently highlighted.</p>	<p><b>Improved connectivity / access to green space</b> The policy clauses around improving connectivity have been retained but, following the completion of the Green and Water Infrastructure Study (2024), we have added new wording to the relevant neighbourhoods and site allocations which now give detail on where we would like to see improvements to green space connections.</p> <p><b>Approach to Metropolitan Open Land / Green Belt</b> A change to this policy approach has not been made as London Plan Policy G3 stipulates that Metropolitan Open Land boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified. A review of Newham’s Metropolitan Open Land and Green Belt has been undertaken ensure that the existing designations reflected the NPPF (2023), London Plan (2021) and Newham’s strategic requirements for green infrastructure.</p> <p><b>Management of new green space</b> A change to this policy approach has not been made as it is considered to be suitably flexible to allow for other forms of ownership and management.</p> <p><b>Maintenance of green space</b></p>
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	<p><b>Growing space</b> Residents expressed a desire for more growing space in Newham, highlighting the current low provision. They would like the policy to be more ambitious regarding the amount of space provided per head of population. Plaistow Assembly wanted to see a policy for community gardens. One community group asked for growing space to be mandatory on school sites.</p> <p><b>Playing fields</b> Sport England raised the need to make a wording change to Policy GWS1.1e, to state ‘playing field’, and not just ‘playing pitches’. Sport England supported the approach in Policy GWS1.2, to ensure the local replacement of any lost playing field and the policy support for ancillary sport facilities on green spaces. Sport England wanted to see the policy clause GWS1.4 to also consider new playing field provision.</p> <p><b>Dogs</b> A number of residents wanted to see greater control of dogs in green and play spaces and the enforcement of the rules relating to dogs.</p> <p><b>West Ham Nursery Site</b> The City of London is exploring opportunities to open-up part of the West Ham Park Nursery Site as new green space. This proposal also includes the delivery of</p>	<p>A change to this policy approach has not been made as the policy already includes mechanisms to ensure maintenance of new parks is secured.</p> <p><b>Growing space</b> The policy continues to require the integration of food growing opportunities where feasible and practical and Policy SI4 continues to require education facilities to maximise biodiversity on site, including the provision of trees gardens, and food growing spaces. However, following completion of the Green and Water Infrastructure Study, the Neighbourhood chapter and site allocations have also been updated to stipulate where we would expect to see new community growing space.</p> <p><b>Playing fields</b> This wording change has been made.</p> <p><b>Dogs</b> The Local Plan is unable to make further changes regarding dogs. However, it should be noted there are 5 dogs on leads control orders in Newham, please see here for further information: <a href="https://www.newham.gov.uk/public-health-safety/dog-care-control">https://www.newham.gov.uk/public-health-safety/dog-care-control</a>. We have also provided the Parks team with the comments relating to this issue.</p> <p><b>West Ham Nursery Site</b></p>
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	<p>housing/employment uses on part of the Nursery Site. Residents, two community groups, London Historic Gardens Trust and the CPRE strongly objected to the idea of developing the Nursery Site at West Ham Park. Instead, they would like to see the site become a publicly accessible green / community growing space. They also requested an update to the Policies Map, to designate the West Ham Nursery Site as green / community growing space.</p> <p><b>Newham needs a planned approach to its green, water, play and growing spaces</b> Residents called for a strategic approach to the planning and investment of Newham’s green spaces including its growing and play spaces.</p>	<p>Following the completion of the Green and Water Infrastructure Strategy (2024), the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.</p> <p><b>Newham needs a planned approach to its green, water, play and growing spaces</b> Newham’s Green and Water Infrastructure Strategy (2024) has assessed the borough’s green, water, play and community growing spaces. The Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham’s green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough.</p>
<p>GWS2 Water spaces</p>	<p><b>General support</b> Residents, a community group, developers, the Canal and River Trust, the Port of London Authority, the Environment Agency, Natural England, the Woodland Trust and the London Legacy Development Corporation broadly supported the policy approach.</p>	<p><b>General support</b> Support for the policy is welcomed.</p>

	<p><b>Access to water space /Improvements to water space</b> Residents wanted to see an improved network of water spaces. Improvements to the River Roding, River Lea and dock edges. Residents and one community group wanted to see more water spaces in Newham’s parks, a desire for outdoor swimming and a strong call for improvements to the quality of the existing water environment. One community group wanted to see monitoring targets for improving water quality.</p> <p><b>Roding Back River</b> Residents and Thames 21 showed strong support for the delivery of the River Roding Trust’s plans to restore East Hams Back River.</p>	<p><b>Access to water space / Improvements to water space</b> Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements can be made. A change to this monitoring framework has not been made as water quality of our rivers is monitored under Policy CE1.</p> <p><b>Roding Back River</b> This policy approach has changed to reflect the support for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their visions to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has also been amended to include a requirement for developers to explore the restoration of the Back River. Newham’s Green and Water Infrastructure Strategy (2024) also supports the Back River initiative.</p>
<p>GWS3 Biodiversity, urban greening, and access to nature</p>	<p><b>General support</b> Residents, a community group, developers, the Canal and River Trust, the Environment Agency, Natural England, the Woodland Trust, Port of London Authority, the Lee Valley Regional Park Authority and the London Legacy Development broadly supported the policy approach.</p> <p><b>Protection / better access to nature</b> Residents wanted to see more protection for existing biodiversity. Residents also wanted there to be more spaces in Newham where they can access nature and</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Protection / better access to nature</b> The policies in the Green and Water Chapter of the Local Plan continue to highlight the importance of improving access to Newham's green and water spaces.</p>

<p>expressed strong support for rewilding projects. The Greenway was highlighted as an important asset. One community group wanted to see more floating gardens on the dock edge to encourage wildfowl.</p> <p><b>Living building features</b> Residents and community groups showed a strong desire for more urban greening, features such as green roof and measures to improve Newham’s biodiversity. Developers broadly supported this element of the policy. The Environment Agency, the London Legacy Development Corporation and a number of residents supported living building features. Two residents supported the provision of green roofs.</p> <p><b>Urban Greening Factor</b> There was support from the GLA, and one community group for the proposal to take forward a bespoke Urban Greening Factor for Newham. Two developers wanted the policy to reflect the London Plan Urban Greening Factor and did not want to see a bespoke Newham approach. The London Legacy Development Corporation wanted to see more information on the Newham-specific approach. Two developers wanted the policy to include a caveat if the target Urban Greening Factor could not be met and highlighted the challenge of delivering urban greening on industrial sites.</p> <p><b>Biodiversity Net Gain</b> There was broad support for the approach to biodiversity net gain, including support from the Environment Agency, residents and developers. One community group wanted Newham to set a more ambitious target. Natural England</p>	<p><b>Living building features</b> Policies in this chapter continue to support the delivery of living building features, including the provision of green space at roof level. Further wording has been added which now provides further guidance on different types urban greening features.</p> <p><b>Urban Greening Factor</b> This policy approach has now changed following the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5.</p> <p><b>Biodiversity Net Gain</b> This policy approach has now changed to better reflect the Environment Act 2021 and the requirement for a minimum 10 per cent Biodiversity Net Gain.</p>
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	<p>made a number of suggestions to ensure the policy reflected the Environment Act 2021 and its requirements. One resident wanted to see better monitoring of biodiversity net gain.</p> <p><b>Sites of Importance for Nature Conservation Value</b> Three developers, the London Legacy Development Corporation and Thames Water disputed the Site of Nature Conservation Value (SINC) designations on their sites.</p> <p><b>Ecologist expertise</b> Residents and one community group raised the need for in-house ecology expertise in the Council.</p>	<p><b>Sites of Importance for Nature Conservation Value</b> A change to the updated SINCs have not been made as an assessment of Newham's SINCs was undertaken between June-August 2022 to inform the Local Plan. This was endorsed by the September 2023 London Wildlife Sites Board.</p> <p><b>Ecologist expertise</b> The Green and Water Infrastructure Strategy (2024) has been completed since the Regulation 18 Local Plan consultation. This updated evidence base has improved our knowledge of the borough's green and water spaces. In addition, the Council is currently seeking to improve our in-house ecology expertise.</p>
GWS4 Trees and hedgerows	<p><b>General support</b> Residents, community groups, developers, the Woodland Trust and London Historic Parks and Gardens showed strong support for this policy.</p> <p><b>Tree planting / increased canopy cover</b> Residents expressed a strong desire for more trees in the boroughs green spaces and on its streets. They would like to see an increase in Newham's canopy cover.</p> <p><b>Protection of trees</b></p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Tree planting / increased canopy cover</b> Policy GWS4 continues to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.</p> <p><b>Protection of trees</b></p>

	<p>A few developers expressed concerns that the policy provided a blanket protection on all existing trees.</p> <p><b>Edible green space</b> One community group requested inclusion of food forests, fruiting species and nut trees in every park/ green space.</p>	<p>A change to this policy approach has not been made as whilst Policy GWS4 seeks to protect trees and hedgerows, it also includes a clause to allow for the loss of a tree or hedgerow where sufficient evidence is provided to justify this approach. This is considered to be proportionate and balanced approach.</p> <p><b>Edible green space</b> This wording change has been made.</p>
GWS5 Play and informal recreation for all ages	<p><b>General support</b> Residents showed strong support for this policy</p> <p><b>Lack of play and informal recreation facilities for children, young people and adults</b> Residents and one community group raised a strong desire for more outdoor facilities for children, young people and adults. There is a need for outdoor spaces which are safe, provide cover, access to nature and place to run and cycle. A need for outdoor spaces to offer additional facilities such as gym equipment, cafes, water fountains and toilets was also raised. Residents highlighted the poor quality of Newham’s existing play spaces.</p> <p><b>Co-design play facilities</b> Residents want to be involved with the design of play space in Newham</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Lack of play and informal recreation facilities for children, young people and adults</b> Newham currently has a low level of play and informal recreation space. Following the completion of the Green and Water Infrastructure Strategy (2024) and the Built Leisure Needs Assessment (2024). The neighbourhood policies and site allocations now include, where appropriate, the need for development to deliver play and sport and recreation facilities.</p> <p><b>Co-design play facilities</b> We have not changed this policy as it already sets out that new play and informal recreation facilities should be designed to meet the needs of Newham’s population, be inclusive, accessible and safe. It support the co-production of play space with local adults, children and young people, parents, and carers.</p>
<b>Climate Emergency</b>		
CE1	<b>Resident support</b>	<b>Resident support</b>

<p>Environmental design and delivery</p>	<p>Residents supported the policy overall, noting their concern about the Climate Emergency and the lack of action to tackle it effectively.</p> <p><b>Contaminated land</b> Developers had concerns regarding de-contamination of land and the requirements and cost of doing so.</p> <p><b>Pollution</b> Concern from the Environment Agency that groundwater pollution was not addressed, and that the Contaminated Land Strategy (2003) was out of date.</p> <p><b>Water efficiency</b> The Environment Agency wished to highlight that Newham is in an area of serious water stress. Concern was raised by Thames Water regarding the need for water efficiency measures and how they could be implemented in policy (such as BREEAM).</p>	<p>Support for the policy was welcomed. The Climate Emergency policies in the Local Plan, as well as wider work across the Council will allow us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p><b>Contaminated land</b> No change was made as developers must remediate land if necessary for development to occur.</p> <p><b>Pollution</b> Additional policy wording and supporting text has been added regarding groundwater pollution and source protection zones. The Contaminated Land Strategy has been updated.</p> <p><b>Water efficiency</b> No change was made as we maintain the 105 litres or less per head per day water use target for residential development, alongside other measures in policy. The supporting text makes clear that Newham is in an area of serious water stress.</p>
<p>CE2 Zero Carbon development</p>	<p><b>Justified and Deliverable</b> Some developers supported the overall aim of the policy. Some developers had concerns about the cost, deliverability and implementation of the policy – and trade-offs with other policy requirements such as affordable housing and infrastructure. Other developers had concerns regarding policy thresholds and when the policy would apply. Residents and community groups supported the policy, as well as offering suggestions on how the policy could go further in future, including stronger energy standards and suggestions of specific materials to be used in construction.</p>	<p><b>Justified and Deliverable</b> Support for the policy is welcomed. The policy approach has remained the same, as it is necessary for Newham to meet its climate emergency objectives and the Climate Change Evidence Base demonstrates that the policy is deliverable, viable and achievable. The evidence base included modelling of a variety of buildings to demonstrate this. As assessment of the cost of the energy policy is included in the viability assessment and demonstrate they are deliverable, in line with the NPPF. The policy thresholds have been clarified, while maintaining the overall approach that as little energy as possible should be used to run/heat a building.</p>

	<p><b>Solar PV offset</b> Developers had concerns regarding the methodology behind the solar PV offset, requesting that it is set to an affordable level. They also had concerns regarding competing requirements for roof space for private amenity, biodiversity net gain, utilities and solar PV.</p> <p><b>Electric heating</b> The GLA had concerns regarding electric heating, noting the high cost of running these systems.</p> <p><b>Gas connections</b> One developer considered the prohibition of gas connections to be onerous.</p> <p><b>Decarbonisation of heat networks</b> Developers, the LLDC and the GLA had concerns regarding the policy requirement for decarbonisation of heat networks, and how this would be achieved in the short run as well as the implications for LLDC requirements and assumptions that developments in close proximity to their heat network, would connect to it in the future.</p>	<p>Support from residents and community groups was welcomed; however, some suggestion by residents (such as using specific building materials) were suggestions that the Local Plan cannot implement. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Solar PV offset</b> The policy has not changed, as the Climate Change Evidence Base demonstrates how the solar PV offset figure was calculated, and the methodology behind it. The Climate Change Evidence Base also considers the trade offs at roof level, demonstrating that targets can be met while allowing some space for other purposes. The supporting text clarifies that roof space should be prioritised for solar PV and that biodiversity improvements and amenity space should be delivered at ground or podium level.</p> <p><b>Electric heating</b> The policy continues to allow electric heating as an option, with the evidence base noting that they may become more viable over time as energy demand from homes falls.</p> <p><b>Gas connections</b> We did not change the policy, as it is necessary to meet our climate objectives. Alternatives to fossil fuelled powered heating are viable and affordable and are in wide use across the UK.</p> <p><b>Decarbonisation of heat networks</b> The policy maintains the objective to move away from heat networks that use fossil fuels. The policy has clarified when connections to district heat networks will be allowed and allows further flexibility. The heat network will not have to be decarbonised at the point of application but a fully funded decarbonisation plan which will be implemented within</p>
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	<p><b>Data centres</b> Some developers had concerns regarding how the policy would affect data centres, noting their abnormal energy use requirements. They also noted that a data centre could provide waste heat.</p>	<p>the lifetime of the Local Plan – must be in place at the point of application.</p> <p><b>Data centres</b> The policy maintains the overall approach that as little as energy as possible should be used to run/heat a building. The policy approach regarding waste heat as a source of low carbon heat has been clarified. The policy is clear that the use of waste heat is supported and encouraged but that waste heat would not be considered to be a specific benefit of a scheme unless it pays for the development of heat network infrastructure that would allow waste heat to be delivered.</p>
<p>CE3 Embodied carbon</p>	<p><b>Justified and Deliverable</b> Some developers supported the policy, but did note the challenge of meeting the requirements. Other developers considered that the policy was too onerous, and should only apply to schemes referable to the Mayor of London. Some developers considered that there was a lack of evidence to support the policy approach. One developer stated that the policy standards exceed building regulations, and the Written Ministerial Statement of 2015 means that we cannot set our own targets and so the policy should follow building regulations.</p> <p><b>Data centres</b> One developer requested that the policy exclude data centres in light of their high embodied carbon.</p> <p><b>Policy doesn't go far enough</b> Some community groups and residents considered that the policy didn't go far enough – targets should be lower and the circular economy should be considered in the policy.</p>	<p><b>Justified and Deliverable</b> The policy approach has been maintained, as newly published evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little viability impact. We maintain the policy approach of applying it to all major development, considering it necessary in light of our climate objectives. This Written Ministerial Statement was superseded in December 2023, and we do not consider that this changes the ability for councils to set their own standards.</p> <p><b>Data centres</b> The policy approach to minimise the amount of embodied carbon has been maintained.</p> <p><b>Policy doesn't go far enough</b> The circular economy principles have been added to the policy. The overall policy approach has been maintained, as we do not have evidence that lower embodied carbon targets would be achievable or justified.</p>

<p>CE4 Overheating</p>	<p><b>General Support</b> Residents and community groups supported the policy, noting their concerns regarding overheating and offering various suggestions on how overheating can be minimised.</p> <p><b>Building Regulations</b> Some developers considered that overheating is covered in Building Regulations and should not therefore be included in the Local Plan.</p> <p><b>Active cooling</b> The Port of London Authority and some developers noted that prohibiting active cooling may be the only way to prevent overheating if other policy objectives take precedence.</p> <p><b>Data centres</b> One developer requested that the policy exclude data centres, given the large amount of mechanical cooling used.</p>	<p><b>General Support</b> Support is welcomed, and the supporting text includes a variety of passive design considerations that help to minimise overheating.</p> <p><b>Building Regulations</b> The policy remains in the Plan and the justification text has been expanded to show why considering overheating at the earliest stage of design is important. This is because, passive design principles (building orientation, unit layout etc.) can only be considered at the earliest stage of design, and during the planning process, rather than later during the design process, when building regulation sign off occurs. Delaying these considerations risks limiting the cooling principles which could be considered making it more likely that active cooling methods are required.</p> <p><b>Active cooling</b> The policy approach has been modified, clarifying that significant noise, pollution or agent of change issue may mean that that active cooling is appropriate. Policy H11 Housing Design quality also requires the provision of alternative aspects (windows or doors) where poor external conditions including noise and visual amenity exist.</p> <p><b>Data centres</b> The policy approach has been maintained, with buildings required to be designed to minimise the need for active cooling as much as possible. This is considered to be flexible enough to consider exceptional uses such as data centres.</p>
<p>CE5 Retrofit and the circular economy</p>	<p>Some residents considered that the policy should further encourage retrofit for householders, as well as supporting residents who do so. Other residents and community</p>	<p>The justification text has been expanded with background on retrofit, and why comprehensive retrofit should be considered. No further changes have been made as</p>

	<p>groups made suggestions on how retrofit can be implemented in the borough, such as increasing the amount of solar panels, removing gas boilers and lowering the cost of a planning application</p>	<p>many retrofit actions can take place without needing planning permission and the policy is already supportive of retrofit work. Some suggestions from residents are included in the policy, however some suggestions by residents cannot be implemented by the Local Plan. We have passed on suggestions that other teams in the Council can action for consideration.</p>
<p>CE6 Air quality</p>	<p><b>General Support</b> Some developers and the Environment Agency supported the policy, noting Newham’s poor air quality and efforts to improve this.</p> <p><b>More action needed</b> Residents and community groups noted their concern regarding air quality in the borough. Many residents offered suggestions on how air quality could be improved in the borough, such as tree planting, reducing private car use and mandating a specific planting density.</p>	<p><b>General Support</b> Support for the Local Plan approach is welcomed.</p> <p><b>More action needed</b> Many suggestions by residents were things that the Local Plan cannot implement, noting that many actions to address poor air quality are being taken across the Council (such as the Climate Action and Highways team) and by Transport for London. We have passed on suggestions that other teams in the Council can action for consideration.</p>
<p>CE7 Managing flood risk</p>	<p><b>Alignment with water studies</b> The Environment Agency, Port of London Authority and GLA were supportive of, and suggested greater referencing of, water studies which LB Newham is working on in partnership. The Royal Docks Team suggested removing the Riverside Strategy reference.</p> <p><b>Small technical amendments</b> The Environment Agency were strongly supportive of the policy but requested that some small technical</p>	<p><b>Alignment with water studies</b> A small change to the implementation text has been made to explain how developments within the Royal Docks and Beckton area should deliver the relevant site-specific recommendations of the local Integrated Water Management Strategy. However references to the Riverside Strategy have been removed due to uncertainty around resourcing this study.</p> <p><b>Small technical amendments</b> The wording recommendations have been made to ensure policies are suitably robust, in line with best practice and clear.</p>

	<p>amendments be made to the policy regarding setbacks, safe havens and lifetime of a development definition.</p> <p><b>Policy Flexibility</b> Developers requested further policy flexibility regarding policy requirements on setback.</p> <p><b>Further details on flood defences</b> The Environment Agency and Royal Docks Team requested that further detail be provided on flood defences in the borough and how developments should maintain them.</p>	<p><b>Policy Flexibility</b> This change was not made as flexibility is already provided through the implementation text, which states that the buffering line is indicative only and that applicants should discuss requirements further with the Environment Agency. The current and draft policies are in keeping with national and regional policy.</p> <p><b>Further details on flood defences</b> The wording in the implementation text has been changed to include these flood defences requirements. It was not considered necessary to add further wording on the requirements for developers as this was already adequately addressed.</p>
CE8 Sustainable drainage	<p><b>Groundwater protection</b> The Environment Agency supported this policy but requested further detail be added regarding the need to consider land contamination when discharging surface water.</p> <p><b>Policy Flexibility</b> Developers requested further policy flexibility regarding standards for greenfield run off rates in the policy.</p> <p><b>Guidance on greening and permeable surfaces</b> Climate You Change suggested greater emphasis and guidance on greening and permeable surfaces be included.</p>	<p><b>Groundwater protection</b> This wording change was been made to provide further guidance on this issue.</p> <p><b>Policy Flexibility</b> This change was not made as it was considered there was sufficient evidence, in the Local and Strategic Integrated Water Management Strategies, to demonstrate the necessity and deliverability of the standards. In addition the policy provides greater flexibility in the limited circumstances where they cannot be achieved.</p> <p><b>Guidance on greening and permeable surfaces</b> Changes regarding greening were not made as this is sufficiently addressed in the Sustainable Drainage Hierarchy which development is required. Further greening requirements for new development are also already included in the Green and Water Space policies. Some changes to reference need for permeable surfaces have been made, which also</p>



		<p>reflect the recommendations of the Strategic Integrated Water Management Strategy for the Royal Docks and Beckton Opportunity Area. This highlighted the need for, and opportunity to, establish targets for Blue-green infrastructure run-off reduction interventions on site allocations in that part of the borough.</p>
<b>Transport</b>		
<p>T1 Strategic Transport</p>	<p><b>General Support</b> Developers, Transport for London (TfL) and London City Airport welcomed the policy. Residents and community groups supported the policy, with many general suggestions on how transport in the borough could be improved, including improved cycle routes, better bus services and discouraging driving.</p> <p><b>Rail heads</b> One developer requested that the Bow East Goods Yard be safeguarded as a strategic rail head, in light of its use for the transport of aggregates to supply the construction industry in London.</p> <p><b>Bridges and piers</b> Port of London Authority requested that bridges and piers be considered as strategic transport infrastructure, to offer them greater protection and consideration from nearby development.</p>	<p><b>General Support</b> Support for the policy is welcomed. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. Projects and initiatives suggested were fed into the development of the strategy, which assisted policy development. We have also passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Rail heads</b> Policy wording has been amended to include the safeguarding of rail heads.</p> <p><b>Bridges and piers</b> Policy wording has been updated to include these as strategic transport infrastructure.</p>
<p>T2 Local Transport</p>	<p><b>General Support</b> Residents, community groups and developers expressed their support for the policy, making suggestions how walking, cycling and public transport in the borough could be improved. Specific routes mentioned included the Greenway, River Roding Way, Leaway, Thames Path and major roads in the borough. Residents, community groups,</p>	<p><b>General Support</b> Support for the policy is welcomed. The supporting text has been expanded to note support of improvements to public transport. The Sustainable Transport Strategy was consulted on in March 2024. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. Projects and initiatives suggested were fed into the development of the</p>

<p>developers and TfL supported the future Sustainable Transport Strategy, and expressed desire to input into this work.</p> <p><b>Low Traffic Neighbourhoods</b> Some residents expressed concern regarding Low Traffic Neighbourhoods and the policy approach regarding these – with concern regarding traffic displacement, consultation, equity and a perceived inability to access certain parts of the borough.</p> <p><b>Freight by river</b> Port of London Authority requested that the policy be expanded to promote the use of the river for freight.</p> <p><b>Developer contributions</b> Some developers had concerns regarding the cost of developer contributions for cycle hire and wayfinding, as well as querying if it would benefit their own development sites.</p> <p><b>Publicly accessible cycle hire and car clubs</b></p>	<p>strategy, which assisted policy development. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Low Traffic Neighbourhoods</b> The policy approach has been maintained. The Local Plan encourages new developments to support the rollout of LTNs, including the delivery of key walking and cycling connections within the site and to and from key local facilities, as well as the layout of the site.</p> <p>With regards to resident concerns regarding LTNs, consideration of an LTN involves extensive data collection and consideration of feedback from local residents and businesses. Traffic management may mean that residents have to take a slightly different route to get from the main road to their property. All properties remain accessible by car. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>The rollout of LTNs in Newham has led to a significant decrease in traffic volumes, a significant increase in cycling trips, and improvements in air quality.</p> <p><b>Freight by river</b> The supporting text has been amended to support this.</p> <p><b>Developer contributions</b> The policy approach, to require contributions, has been maintained, as there may be cases where monies are pooled for improvements in a local area, rather than delivered on the development site.</p> <p><b>Publicly accessible cycle hire and car clubs</b></p>
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	<p>Metropolitan Police requested that car club parking spaces not be located within private parking for security reasons.</p>	<p>Wording has been changed to clarify that cycle hire and car clubs should be publicly accessible.</p>
<p>T3 Transport Behaviour Change</p>	<p><b>General Support</b> Residents generally supported the policy, with many making suggestions on how walking, cycling and public transport in the borough could be improved, including new cycle lanes, improved bus services and better public realm.</p> <p><b>Car free development</b> Some developers supported the approach of car free development, while other developers objected to the approach, considering the policy to be restrictive and unrealistic. Some developers argued that the policy wording for industrial sites is not consistent with the car free development approach.</p> <p><b>Mobility scooters</b> TfL noted that parking for mobility scooters would only be considered as an exception to blue badge parking requirements where it could be justified.</p> <p><b>Electric Vehicle Charging Points</b> Some developers did not support the policy requirement to provide contributions for Electric Vehicle Charging Points when development is car free.</p>	<p><b>General Support</b> Support for the policy is welcomed. The Sustainable Transport Strategy was consulted on in March 2024. Projects and initiatives suggested were fed into the development of the strategy, which assisted policy development. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Car free development</b> The policy approach has been amended to make clear that that all new development will be car free, apart from limited provision for certain uses/use cases (such as industrial development with shift work and poor public transport accessibility), which must be within the maximum standards of the London Plan. We have maintained the overall policy approach in light of London Plan parking standards for inner London boroughs, Opportunity Area modal shift targets and a general policy direction to discourage private car use to support a Just Transition.</p> <p><b>Mobility scooters</b> The supporting text has been amended to make clear when it would be acceptable to reduce the quantity of blue badge parking by providing mobility scooter parking. This is only when the development is located in an accessible and well connected location.</p> <p><b>Electric Vehicle Charging Points</b> No change has been made to this policy approach. Supporting text has been expanded to make clear why the policy maintains restrictions on new car usage, while supporting the rollout of electric vehicles for residents and businesses who need them. Developments need to</p>

	<p><b>Charging of E-bikes</b> TfL and the London Fire Brigade requested that charging of batteries for e-scooters and e-bikes take place in the home, not in cycle storage, due to fire risk.</p> <p><b>Excess road space</b> Some residents expressed a desire to reduce excess road space (such as wide junctions), including expanding the amount of pedestrianised / car free areas.</p> <p><b>Low Traffic Neighbourhoods</b> Some residents expressed concern regarding Low Traffic Neighbourhoods and the policy approach regarding these – with concerns regarding consultation and perceived inability to access certain parts of the borough.</p>	<p>receive deliveries and be serviced and residents will receive visitors who use cars – in order for the plan to deliver our sustainability objectives these must be electric, which require a network of charging facilities.</p> <p><b>Charging of E-bikes</b> The policy approach has been amended to make clear how charging of E-bikes and mobility scooters can be charged safely.</p> <p><b>Excess road space</b> A new policy clause has been added, supporting applications which would result in the loss of existing car parking/excess road space, helping to encourage more sustainable modes of transport, in line with our transport objectives. In addition, the policy also outlines that drive-throughs would not be supported, in light of their impacts including idling vehicles, littering and health impacts from takeaway food.</p> <p><b>Low Traffic Neighbourhoods</b> As outlined under policy T2, the policy approach remains the same. With regards to residents concerns regarding LTNs, consideration of an LTN involves extensive data collection and consideration of feedback from local residents and businesses. Traffic management may mean that residents have to take a slightly different route to get from the main road to their property. All properties remain accessible by car. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted. The rollout of LTNs in Newham has led to a significant decrease in traffic volumes, a significant increase in cycling trips, and improvements in air quality.</p>
T4	<b>Last mile deliveries</b>	<b>Last mile deliveries</b>

<p>Servicing a development</p>	<p>Developers objected to the policy approach as they considered it would not be achievable within their business requirements and the lack of a comprehensive zero-emission fleet. Some developers requested policy flexibility, for the same reason.</p> <p><b>Freight by river</b> Port of London Authority requested that the policy be expanded to promote the use of the river for servicing and deliveries.</p>	<p>The policy approach has been maintained, following the evidence from the Sustainable Transport Strategy, which outlines how servicing by sustainable means can be delivered through the use of zero-emission vehicles or e-cargo bikes, increased numbers of parcel lockers as well as freight consolidation between businesses.</p> <p><b>Freight by river</b> The supporting text has been amended to support this.</p>
<p>T5 Airport</p>	<p><b>Policy Objectives</b> Residents supported the policy approach to seek to manage expansion and change at the airport, as it addressed their concerns regarding expansion of the airport, night flights, and loss of the respite period. London City Airport considered that the policy takes the wrong approach and should be revised. London City Airport considers that the airport’s Master Plan demonstrates how it can grow while housing is built in the area around the airport.</p> <p><b>National policy and masterplan</b> London City Airport stated that national policy and the airport’s Masterplan were not considered or taken into consideration and that the policy should be drafted taking both into account.</p> <p><b>Mitigation of Impacts</b> London City Airport consider the policy takes a negative position on airport related development proposals without considering how impacts can be mitigated.</p>	<p><b>Policy Objectives</b> The general policy approach has been maintained. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p> <p><b>National policy and masterplan</b> The airport’s Masterplan does not have a statutory basis, but provides a statement of intent to be given due consideration in the planning process. The policy approach has not changed as both the airport’s Masterplan and national aviation policy were given due consideration in the development of this policy.</p> <p><b>Mitigation of Impacts</b> The policy approach has been clarified to state that development would be acceptable only if it did not cause unacceptable negative impacts to existing local residents and new homes and their future residents,</p>

	<p><b>Consolidation of the airport and land uses</b> London City Airport supported consolidation of ancillary airport infrastructure to free up land for employment generating uses. London City Airport considered that the policy wording could be more flexible than only supporting industrial uses, in order to allow for more aspirational land uses.</p> <p><b>Freight</b> London City Airport expressed concerns regarding freight flights not being supported in policy, noting that air freight could be of benefit to Newham and east London.</p> <p><b>Improved connections and car parking</b> Residents expressed a desire for improved connections to the airport from the north of the borough and Barking. TfL supported the policy approach to reduce car parking. London City Airport stated that policy cannot require a reduction in the level of car parking on site and requested that this policy requirement be removed. London City Airport also expressed desire for the policy to further support an Elizabeth line station to serve the airport.</p>	<p>following mitigation. Furthermore, the policy approach has been amended to make clear that it is noise, vibration, smell and air quality impacts which should be mitigated - and where negative impacts would be unacceptable even following mitigation, development would not be supported. The policy states that it is considered that reducing the extant respite period or the introduction of night flights would result in an un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.</p> <p><b>Consolidation of the airport and land uses</b> This policy approach has changed to remove specific examples of uses that support or complement the airport and therefore provides more flexibility.</p> <p><b>Freight</b> The policy wording has been amended to make clear that dedicated freight planes would not be supported, however using any spare capacity on existing passenger flights for freight would be acceptable.</p> <p><b>Improved connections and car parking</b> The policy approach has been maintained, as a future development proposal could reduce the amount of car parking on site and in line with the Plan and London Plan's approach to car parking, we would seek to support and secure this. The Sustainable Transport Strategy supports efforts by London City Airport, TfL and the Council to improve sustainable access to the airport. Discussions with both TfL and consultants working on the Sustainable Transport Strategy, concluded</p>
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	<p><b>Net Zero</b> London City Airport suggested that the policy should be more flexible - allowing “low ... carbon technologies” where it “does not adversely impact local residents”</p>	<p>that an Elizabeth line station is not necessary to support the levels of growth in the Royal Docks.</p> <p><b>Net Zero</b> Policy approach was maintained in light of the Council's commitments to achieve net zero by 2045, and London City Airport being a net zero carbon business by 2050. The Council supports future zero carbon technology, and does not wish to "bake in" unsustainable technology in the interim.</p>
<p><b>Waste and Utilities</b></p>		
<p>W1 Waste management capacity</p>	<p><b>East London Joint Waste Plan</b> The Greater London Authority welcomed the progress on the East London Joint Waste Plan. They questioned whether the currently adopted safeguarded site for a potential future waste site at Beckton Riverside should be released. Some developers questioned the identification of waste sites on land they were redeveloping.</p> <p><b>Circular economy and improving standards</b> Residents, the Greater London Authority and the Environment Agency broadly supported the policy, and commitments to deliver a more circular economy. Broader concerns about rubbish, fly tipping and recycling collections were raised by residents.</p>	<p><b>East London Joint Waste Plan</b> Support for the progress on the Joint Waste Plan is welcomed. The Evidence Base for the East London Joint Waste Plan shows there is sufficient capacity for east London to manage waste arisings in its area without the need for the provision of new waste sites, and therefore we have decided not to take forward the safeguarded potential waste site at Beckton Riverside in the Joint Waste Plan. We will be formally pursuing the release of this site, along with confirmation of safeguarded waste sites, through the update of the Joint Waste Plan, the preparation of which is currently being undertaken in parallel with the update of the London Borough of Newham's draft Local Plan.</p> <p><b>Circular economy and improving standards</b> While the Local Plan addresses this topic through waste policies, some of the comments provided will be best addressed by our Waste team in the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham’s Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.</p>
<p>W2 New or improved waste</p>	<p>Residents broadly supported the policy, and similar to the responses to Policy W1, requested improvement to waste</p>	<p>While the Local Plan addresses this topic through waste policies, some of the comments provided will be best addressed by our Waste team in</p>

management facilities	disposal and collection in the borough. The Environment Agency supported the design considerations for new waste management facilities.	the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.
W3 Waste management in developments	<p><b>General support</b> Residents and charities broadly supported the policy, particularly the requirements for separated recycling and food waste storage spaces in homes and reuse and tool sharing rooms in major-scale residential developments on site allocations. Developers raised logistical concerns around whether there was sufficient space on site to provide dedicated reuse rooms. Similar to the responses to Policies W1 and W2, residents and charities requested improvement to waste disposal and collection in the borough.</p> <p><b>Recycling targets</b> The Greater London Authority questioned whether Newham should seek to set more ambitious recycling targets.</p>	<p><b>General support</b> The broad support for the policy requirements is noted. We have not made a change to the policy approach to provide reuse rooms, recognising the policy applies to site allocations, which are the largest sites available in the borough. While the Local Plan addresses some concerns raised by residents through waste policies, some of the comments provided will be best addressed by our Waste team in the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.</p> <p><b>Recycling targets</b> The policy approach has not changed. It is well-understood that not all London boroughs will be able to meet the GLA's targets to meet a municipal waste recycling target of 65 per cent by 2030, particularly given the high density of flats delivered and planned in the borough.</p>
W4 Utilities and Digital Infrastructure	<p><b>General Support</b> This policy is supported by residents, Thames Water, the Environmental Agency.</p> <p><b>Heat network</b> One developer, the LLDC and one resident requested changes to the heat network policy including expressly considering waste heat as a decarbonised energy source, allowing connection to heat networks with a</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Heat Network</b> Wording changes have been made to clarify waste heat is considered to be a carbonised heat source subject to meeting requirements and any developments that ensures continued use of fossil fuels by a heat network beyond the lifetime of the plan will not be supported.</p>



<p>decarbonisation plan and addressing this topic in the climate emergency policy.</p> <p><b>Engagement with utilities providers</b> The Environmental Agency and Thames Water were supportive to the requirement for applicants to carry out pre-application engagement with utility providers while one developer objected to this requirement with the ground that this should be resolved between the council and utilities providers.</p> <p><b>Impact on infrastructure capacity and assets</b> Thames Water, National Grid and the Environmental Agency requested further consideration of infrastructure capacity and assets including on/ off-site capacity, cumulative impact, infrastructure delivery ahead of occupancy, sewage pipe misconnections and implication of development proposals on existing assets.</p> <p><b>Digital growth</b> Developers and residents support the recognition of digital growth in this policy but requested elaboration on details of implementation including support for data and digital economy and Wi-Fi provision.</p> <p><b>Security consideration of digital infrastructure</b> Metropolitan Police requested applicant to undertake pre-application engagement with Counter Terrorism Security Advisors.</p>	<p><b>Engagement with utilities providers</b> This approach has not been changed as the council already engages with utilities providers and the GLA to address utilities infrastructure requirements in the borough and region. All major developments are expected to engage utility providers to ensure utilities networks and connections can serve the development ahead of occupation.</p> <p><b>Impact on infrastructure capacity and assets</b> Wording changes have been made to provide further detail and clarity on utilities capacity and assets.</p> <p><b>Digital growth</b> These changes were not made as data and digital economic growth is already covered in the Inclusive Economy policy and relevant Neighbourhood policies while Wi-Fi provision is covered in Local Plan Policies HS2, CF2, GWS1 and GWS5. However, the policy has changed to aid clarity that policy W4 is now focusing on digital connectivity infrastructure.</p> <p><b>Security for digital infrastructure</b> This requirement has been added into the policy.</p>
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	<p><b>Topics outside this policy</b> Environmental Agency requested expanding the scope of this policy to cover surface water drainage and flood risk. Residents commented on other topics such as water bill and waste management in sewers.</p>	<p><b>Topics outside this policy</b> No changes have been made as surface water drainage and flood risk are covered in Local Plan Policies CE7 and CE8 while the Local Plan cannot deliver water metering and sewage capacity.</p>
<p><b>Neighbourhoods</b></p>		
	<p>Some residents and attendees of the Local Plan assemblies objected to the neighbourhood boundaries. This included the West Ham and Forest Gate boundary, the Canning Town and Custom House and Beckton boundaries, the East Ham boundary, the Royal Albert North boundary and the Royal Victoria and North Woolwich boundary. Some landowners and developers objected to some of the neighbourhood boundaries, including Stratford and Maryland and West Ham boundary, Canning Town and Custom House and Manor Road boundary and Gallions Reach and Royal Albert North boundary. Some councillors and community group representatives argued that residents did not recognise the neighbourhoods due to the lack of engagement and that they were too large to be considered a 15-minute neighbourhood.</p>	<p>The Local Plan neighbourhoods were identified through the Newham Characterisation Study (2022) and informed by public engagement which took place in autumn 2021 and winter 2022, as well as feedback from the Reg 18 consultation. The boundaries of the neighbourhoods were identified through an analysis of the different ways the borough can be sub-divided. This included factors like administrative boundaries such as ward boundaries, planning designations such as town centre boundaries or conservation areas, and their character, such as the look and feel of an area and their function, such as the type of uses in an area. The boundaries were shaped by public engagement and feedback from residents, businesses and local organisations on what they perceive to be their neighbourhood, what is important to them and what they like and don't like. The main purpose of the neighbourhood policies is to provide detailed spatial guidance for a defined area of the borough and as a result will vary in size depending on the variety of character in different parts of the borough. They are not intended to be standalone 15 minute neighbourhoods. The Local Plan's spatial strategy seeks to deliver a network of 15-minute neighbourhoods. The ultimate goal of 15 minute neighbourhoods is to ensure that all residents can live within a 15-minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. The spatial strategy is not intended to create isolated and self-sustaining areas but to support access to services and facilities for everybody, through a network of connected neighbourhoods, which give residents a choice in where they access different facilities and services, whether that is within their own</p>

		<p>neighbourhood or within the wider network. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan. In response to the comments from stakeholders a number of neighbourhood boundary changes have been made:</p> <ul style="list-style-type: none"> <li>• Canning Town and Custom House are now two neighbourhoods and the boundary between Canning Town has changed so that the Canning Town Riverside neighbourhood sits entirely within Canning Town.</li> <li>• The West Ham boundary has changed so that West Ham Park sits entirely within the West Ham neighbourhood.</li> <li>• Stratford and Maryland boundary has changed so that UEL sits entirely within the Stratford neighbourhood.</li> <li>• Gallions Reach boundary has changed so that the whole of the local centre sits within the neighbourhood</li> </ul>
	<p>Some residents and attendees of the Local Plan assemblies queried what some elements of the policies meant, particularly policy requirements such as impact tests, and how they would be delivered. Others wanted the policies to be written in plain English.</p>	<p>The neighbourhood policies have been written in plain English as far as possible whilst also reflecting the technical language required in some circumstances. The neighbourhood policies should be read alongside the themed policies in the Local Plan which provide further guidance on how policies and their requirements, such as impact tests, should be implemented. The Local Plan also contains a glossary.</p>
	<p>Sport England commented on the limited mention of sports facilities and that the sports facility requirements for each neighbourhood should be updated once the sports-related evidence base documents are finalised.</p>	<p>The approach to sports facilities has been updated due to the finalisation of the Built Leisure Needs Assessment and Playing Pitch Strategy. New requirements are reflected in the neighbourhood policies and site allocations.</p>
	<p>TfL identified required improvements to public transport and requested developer contributions to fund the improvements, particularly for step-free access. They also requested that bus stands be protected.</p>	<p>The policy clauses relating to public transport, walking and cycling have been consolidated and updated to reflect the evidence in the Sustainable Transport Strategy. The neighbourhood policies do not provide detail on how transport improvements should be funded as this will be considered in line with BNF4. Strategic infrastructure such as bus stands continues to be protected under Local Plan T1.</p>

	<p>Residents and attendees of the Local Plan assemblies requested that the number of betting shops and fast food shops be reduced. They want to see improvements to their high streets and requested particular types of businesses and shops, including banks, post offices and healthy food options. They also want to see a variety of options in their town centres as well as cultural and community facilities and improved public realm.</p>	<p>The approach to betting shops and fast food shops in the neighbourhood policies has changed to rely on the borough-wide approach set out in the high streets policies that manage the concentration of these uses. The high street policy clauses have been amended to clarify the mix of uses supported in the town centres and local centres, including community facilities as well as reflecting new town centre designations identified to ensure a 15 minute network of town centres across the borough. The request for some types of businesses and services cannot be delivered by the Local Plan as the Local Plan can only specify the uses supported when a planning application is received, rather than requiring specific businesses to locate in a neighbourhood.</p>
	<p>Residents and attendees of the Local Plan assemblies requested that the safety of neighbourhoods, particularly Canning Town and Custom House, is improved. Particular concerns were raised about Romford Road in terms of dangerous driving and parking. They also requested that cleanliness is improved across all neighbourhoods, particularly in relation to littering. Some residents wanted to see local waste and recycling facilities.</p>	<p>The neighbourhood policy design principles already address safety and work alongside other Local Plan policies which address safety, including the design and transport policies. Waste is addressed through the Local Plan waste policies. However, it cannot address topics such as bin collections, recycling collections and fly tipping. This is the responsibility of the waste department. The Local Plan address parking through its parking requirements in the transport policies. The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. We also want people to feel more comfortable walking and cycling on Newham’s streets. Newham Council is planning to introduce a 20mph speed limit on most streets across the borough. Lower speed limits can help to reduce the number of traffic collisions, reduce the likelihood of serious injuries in collisions, especially for pedestrians, reduce noise and pollution from motor traffic, and encourage people to walk and cycle more. Physical measures or traffic calming measures such as road humps or speed cushions will be considered for streets or areas where speeding is occurring frequently. Parking is not allowed on footways or footpaths, pavements or grass verges – unless specifically exempted. Our parking enforcement officers can issue a Penalty Charge Notice (PCN) to vehicles parked in contravention or parked dangerously.</p>

	<p>Residents, community group representatives and attendees of the Local Plan assemblies want to see more community facilities. They also requested particular types of services including support for residents' mental health, adult education classes and exercise classes. Residents and attendees of the Local Plan Assemblies want to see more secondary schools, particularly in the south of the borough.</p>	<p>A new policy clause has been added to support community facilities that are in accordance with Local Plan SI1 where the Community Facility Needs Assessment has identified the neighbourhood as being below the borough average for community facilities. The request for some types of services within community facilities cannot be delivered by the Local Plan as the Local Plan can only protect existing community facilities and support new facilities in certain locations, rather than specifying the type of activities that should take place in venues. The requirements for new schools, which are reflected in the site allocations, is consistent with the Council's Pupil Place Planning work, which identifies the need for new schools in different parts of the borough.</p>
	<p>Residents, community group representatives and attendees of the Local Plan assemblies want more open space, particularly parks and requested improvements to particular locations across the borough.</p>	<p>The neighbourhood policies have been updated to reflect the finalised Green and Water Study, the Built Leisure Needs Assessment and the Playing Pitch Strategy which set out improvements to open space, green infrastructure and sports facilities in the relevant neighbourhoods.</p>
	<p>Some residents and attendees of the Local Plan assemblies objected to the support for Low Traffic Neighbourhoods. Some wanted to know the implication of Low Traffic Neighbourhoods and the designation of neighbourhoods on their ability to travel around the borough. Residents and attendees of the Local Plan assemblies identified specific locations where they want to see improvements to walking, cycling and public transport as well as to the public realm.</p>	<p>The approach to Low Traffic Neighbourhoods has not changed. Newham currently has five permanent Low Traffic Neighborhoods (LTNs), as well as potential LTN in Woodgrange and Capel, and exploration of options to create more people-friendly streets in the West Ham Park area. A Low Traffic Neighbourhood is predominantly residential area that is bounded by main roads, in which a set of modal filters has been installed to prevent motor vehicles from using the residential area as a shortcut. Excess motor vehicle traffic in residential areas causes noise, road danger and pollution; and creates a poor environment for walking and cycling. LTNs aim to improve street environments and local neighbourhoods for walking and cycling by reducing traffic volumes, improving the quality of life for local residents, and making it easier for residents to choose walking or cycling for local journeys. LTNs are enforced by automatic number plate recognition (ANPR) camera and non-exempt motor vehicles driving through them will receive a Fixed Penalty Notice (FPN). These operate 24 hours per day, 7 days per week. All addresses can be reached in and amongst</p>

		<p>LTNs without receiving an FPN, although routes may differ to avoid modal filters. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted. The ultimate goal of 15 minute neighbourhoods is to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities and parks and by creating new routes to increase access to existing facilities. There is no plan, intention or objective to limit residents to accessing one part of the borough or one set of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>
	<p>Residents and attendees of the Local Plan assemblies want to see the character of their neighbourhoods and historic buildings to be protected, particularly in Forest Gate and Manor Park. Some residents want to see more support for extensions to create larger family homes. Others objected to the increase in flats in some neighbourhoods, particularly in East Ham.</p>	<p>The conserve and enhance principles have been updated to add clarity to how the character of each neighbourhood will be conserved and enhanced. The neighbourhood policies do not address family sized housing as this is addressed in the design and housing policies, which are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts.</p>
	<p>London City Airport requested that the North Woolwich neighbourhood policy supports an Elizabeth line station at the airport.</p>	<p>No changes relating to the airport have been made. Discussions with TfL and the evidence in the Sustainable Transport Strategy conclude that an Elizabeth line station at London City Airport is not required to deliver the level of housing and employment growth in the Royal Docks.</p>
	<p>The Port of London Authority requested that the policy makes reference to safeguarded wharves, including noise mitigation and those in neighbouring boroughs, and should recognise the specific challenges in finding the best route for the Thames Path in the Royal Victoria and North Woolwich neighbourhoods.</p>	<p>The relevant policies have been amended to make reference to safeguarded wharves. However, the policies do not recognise the particular challenges of finding a route for the Thames Path as this will be addressed during pre-application and application discussions.</p>

	<p>Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development in the Royal Victoria and North Woolwich neighbourhoods.</p>	<p>The relevant policies have been amended to better address the relationship between industrial and non-industrial uses.</p>
	<p>Lidl argued that the size of supermarkets supported in the neighbourhood policies should be increased as they are below the minimum requirements for a discount food store. Residents and attendees of the Local Plan assemblies want more supermarkets, particularly in the neighbourhoods in the Royal Docks.</p>	<p>The approach to food stores in the Local Plan has changed to allow for more flexibility in the scale of food store supported in local centres. This has been reflected in the relevant neighbourhood policies.</p>
	<p>Residents, local businesses, community groups and attendees of the Local Plan Assemblies had a mix of views on the neighbourhood policy clauses about improvements to Queen's Market. Some would like to see improvements to the market's facilities such as lifts, toilets and improved public realm and safety. Others do not want the market to change whilst some would like to see development for housing at the market.</p>	<p>The neighbourhood policy already addresses the improvements that stakeholders want to see to Queen's Market. It also recognises the importance of Green Street for shopping and protects the specialised retail offer. However, the policy has been amended to support the range of uses that may come forward on the site. These are being explored as part of the Queen's Market and Hamara Ghar Investment Strategy.</p>
	<p>Landowners argued that that Gallions Reach neighbourhood policy is too dependent on the DLR extension and should instead refer to other types of transformative transport measures and argued that more development could be delivered prior to the DLR extension. They requested clarity on the release of safeguarding land for the river crossing.</p>	<p>The Gallions Reach neighbourhood policy has been amended to include reference to transformative transport measures as well as the DLR extension and to clarify the position on the release of safeguarded land for the river crossing.</p>
	<p>The LLDC argued the Stratford and Maryland policy should better reflect the future role of Stratford as an International Centre and should better reflect the aspirations for Stratford Station and its surrounding sites.</p>	<p>The neighbourhood policy already recognises the future role of the town centre as an International Centre but this has been made clearer in the neighbourhood vision and the relevant site allocations. Various policies in the Local Plan support increased capacity and associated infrastructure improvements at the station. The site allocation for Stratford Station has been informed the by work on the Urban Design Framework and the Outline Businesses Case as well as our own borough-wide evidence on the need for different uses.</p>

	The Lea Valley Regional Park Authority requested that the Stratford and Maryland and Three Mills neighbourhood should be amended to include elements of the Park Development Framework, particularly for Three Mills Island.	The Three Mills and Stratford and Maryland neighbourhood polices have been amended to reflect elements of the Park Development Framework.
<b>Sites</b>		
	National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested engagement with them during the development of these sites. Thames Water identified which sites are likely to require upgrades to the water supply and wastewater network. They recommended that developers and the LPA liaise with Thames Water at the earliest opportunity to discuss phasing of development. They also objected to development on some sites due to the proximity of development to their assets.	The site profile, design principles and infrastructure requirements have been updated to reflect Thames Water and National Grid assets and to encourage engagement with them during pre-application discussions.
	The Environment Agency identified flooding constraints on each site as well as identified Source Protection Zones. They requested specific planning conditions for sites within Source Protection Zones.	The site profile, development principles and design principles have been updated in light of the SFRA. Source protection zones are now addressed in the site profiles as well as the Climate Emergency policies.
	Historic England identified site allocations that should support addressing assets currently on the Heritage at Risk Register. They argued that there he possibility that the envisaged quantum of development in Stratford will have an adverse effect on the historic environment in an area that contains the borough's greatest concentration of heritage assets. They requested we understand the significance of heritage assets and townscape character and how it will be affected by future proposals.	Further work has been undertaken with Historic England to further develop the design principles, particularly in sites in Stratford and Maryland, to manage the impact on heritage assets and to make reference to Conservation Area Appraisals and Management Plans.



	<p>Sport England objected to the loss of sports facilities on some sites.</p>	<p>The development proposals have been updated to make explicit reference to sports and recreation facilities to make clear they are protected.</p>
	<p>TfL identified required improvements to public transport and requested developer contributions to fund the improvements as well as improvements to walking and cycling routes on some sites.</p>	<p>The infrastructure requirements and design principles have been updated to reflect the evidence in the Sustainable Transport Strategy. The infrastructure requirements include improvements to public transport where necessary to support development. They do not provide detail on how transport improvements should be funded as this will be considered in line with BNF4.</p>
	<p>A landowner requested that the neighbourhood policies acknowledge the exceptional abnormal circumstances that relate to gasholder sites.</p>	<p>The neighbourhood policies do not address viability requirements. For surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p>
	<p>A number of new sites were submitted for allocation by both landowners and members of the public. Some landowners resubmitted sites that had not been allocated or identified additional development plots within existing allocations, particularly in Stratford.</p>	<p>The new sites have been assessed in line with the methodology set out in the Site Allocation and Housing Trajectory Methodology Note. One site was allocated based on updated information from the landowner on availability. Another site was allocated due to reconsideration of how the site could be delivered while delivering the Local Plan's objectives regarding open space. Other sites were not allocated as they did not meet the criteria for allocation set out in the Site Allocation and Housing Trajectory Methodology Note. Stratford Town Centre West has been extended to include new development plots.</p>
	<p>CPRE requested that all site allocations on land with existing open space are deleted.</p>	<p>The approach to development on open space has not changed. The approach to site allocations on green space is set out in the Site Allocation and Housing Trajectory Methodology Note. This sets out how open space was considered during the site sifting and site assessment stages of allocating sites. The development principles of the few sites involving open space has been updated to make clear the requirement for reprovision in accordance with GWS1. The site allocations have also been informed by the finalised Green and Water Study which has informed the infrastructure requirements for different types of open</p>

		space on sites, which include parks of different scales across the borough.
	Landowners and developers objected to the level of detail on the site allocation maps, particularly the location of frontages and key routes. Some argued that the maps did not reflect pre-application discussions or planning permissions.	A new approach to how development and design principles are illustrated on the site allocation maps to make clearer the key routes. Some changes were made to reflect changes to site requirements based on updated evidence, such as the location of town centre uses and open space requirements.
	Landowner and developers objected to the inconsistency between maximum heights parameters expressed in meters in the tall building zones and expressed in number of storeys. Some requested greater height on their sites. Residents and attendees raised concerns on heights in some locations due to potential overshadowing and impact on existing residents. The Lee Valley Regional Park objected to the impact of tall buildings on the waterways and on heritage assets in the Three Mills neighbourhood. Historic England requested further detail as to how tall buildings will achieve the conservation and enhancement of the historic environment, particularly for sites in Stratford.	The design principles related to height have been amended to include both storeys and meters. Further detail has been added to manage the impact on heritage assets and on waterways.
	The NHS provided up to date information on the requirements for new health centres as well as progress on NHS-owned sites.	The infrastructure requirements have been refined to reflect comments from the NHS, including the removal of a health centre in Silvertown Quays. The requirements are now subject to a needs based assessment at the time of delivery.
	Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development, particularly in relation to the location and height of buffer buildings.	The design principles and site allocation maps have been updated to make clearer requirements for buffering buildings on Lyle Park West and Connaught Riverside.
	Some landowners and developers objected to the town centre designations on their site, particularly at Silvertown Quays. Others argued that town centre uses should be located on their sites, outside of designated centres.	The approach to the local centre extension at Silvertown Quays has not changed. A single integrated Local Centre optimises opportunities of the wider location and is logical in terms of relationship with travel patterns and proximity of main town centre uses creating a single cluster. The proposed scale and location of this boundary and other local and town

		centre boundaries is based on available information regarding additional retail and leisure need in the area. Local Plan policy HS1 allows for the boundary of Local Centre extensions to be flexibly adjusted through masterplanning processes.
	Some landowners and developers objected to the infrastructure requirements on their sites. This included NHS requirements, including specifying the size of health centre required, and leisure centre requirements.	The infrastructure requirements have been updated to the evidence in the Built Leisure Needs Assessment. This includes the removal of a leisure centre on Silvertown Quays. This site has also been amended to support leisure uses in the form of water uses.
	Some landowners and developers objected to the open space requirements on their site, both in terms of quantity and locations. Two landowners argued that their sites should be de-designated from Metropolitan Open Land.	A minor change has been made to the Metropolitan Open Land boundary has been made at East Ham Gasworks. However, no sites have been de-designated from the MOL as the Newham MOL and Green Belt Review (2024) recommends the MOL remains in place with the exception of the minor boundary change.
	Some landowners and developers objected to employment uses on their site. Some argued it did not reflect pre-application discussions or planning permissions, whilst others argued that employment uses were not suitable on their sites. Some argued that there should be greater flexibility for new office, particularly in the Royal Docks.	The description of acceptable employment uses has been clarified. However, there has been no change to the sites allocated for employment uses given the need for industrial land and the oversupply of offices in the borough.
	Residents and attendees of the Local Plan assemblies requested more community facilities on sites, particularly in Canning Town, as well as more open space, particularly in the east of the borough.	A new policy clause has been added to support community facilities where the Community Facility Needs Assessment has identified the neighbourhood as being below the borough average for community facilities. The finalised Green and Water Study has informed the design principles and infrastructure requirements relating to the type of open space required on sites as well as green infrastructure requirements.
	Residents and attendees of the Local Plan assemblies objected to the loss of Balaam Leisure Centre.	The phasing and implementation section of the Balaam Leisure Centre has been updated to require a new leisure centre to be delivered in the Canning Town neighbourhood prior to any residential development taking place on this site. This is supported by evidence in the Built Leisure Needs Assessment.
	The LLDC argued the Stratford Station site allocation should better reflect the aspirations of the Outline Business Case and the Urban Development Framework,	Various policies in the Local Plan support increased capacity and associated infrastructure improvements at Stratford Station. The site allocation for Stratford Station has been informed the by work on the

	<p>particularly in terms of the site allocation map and the mix of uses. They also requested that some sites in the LLDC Local Plan are carried forward into the Newham Local Plan.</p>	<p>Urban Design Framework and the Outline Businesses Case as well as our own borough-wide evidence on the need for different uses. An assessment of the existing LLDC Local Plan site allocations in Newham has been undertaken during the preparation of the Draft Newham Local Plan as set out in the Site Allocation and Housing Trajectory Methodology Note. The majority of the site allocations have been included and updated to ensure alignment with our approach to sites and to reflect our borough-wide evidence on the need for different uses. This process also identified some sites that were no longer required due to their delivery status. Two further sites did not meet the criteria to be included as site allocations.</p>
	<p>Landowners argued that that Beckton Riverside is too dependent on the DLR extension and should instead refer to other types of transformative transport measures and argued that more development could be delivered prior to the DLR extension, particularly in relation to building heights. Thames Water objected to the allocation given the adjacent sewage works.</p>	<p>This approach outlined in the site allocation has now changed to support suitably scaled and located deadweight development and reflect the potential for an alternative transport intervention (if confirmed by Transport for London) to enable development have now been included. The site allocation wording has also been updated to include the range of transport infrastructure changes which could occur on this site and which would then impact the scale and nature of potential development and which therefore need to be factored into masterplanning of the site. No changes have been made to the site allocation in response to Thames Water's odour concerns as there are sufficient policy requirements to ensure that odour and odour mitigation are considered at application stage. Initial work is also already being undertaken, in consultation with Thames Water, to consider in more detail the potential odour impacts and any required mitigation.</p>
	<p>Residents and attendees of the Local Plan assemblies and the River Roding Trust argued for site allocations in East Ham to support the reopening of the Back River.</p>	<p>The development principles for East Ham Gasworks have been updated to require the developer to explore the reopening of the Back River.</p>
	<p>Friends of Queens Market object to a site allocation for major redevelopment on the site, arguing that there is a lack of information for the public and it will result in the loss of the market. Attendees of Local Plan assemblies had mixed views on development at Queen's Market. Some</p>	<p>The Queen's Market site allocation has been removed from the Local Plan due to the on-going work the Council is undertaking with the local community as part of the Queen's Market and Hamara Ghar Investment Strategy. The Strategy is looking at what uses and what type of development may take place across the site allocation and these options</p>

	<p>argued that Queen's Market should be protected whilst others supported the site allocation and housing on the site.</p>	<p>were included in the Draft Local Plan. However, as this work has not yet concluded at the time the submission draft is being finalised, the site allocation has been removed from the Local Plan. This is because we must be able to demonstrate that a site is suitable, available and achievable and is therefore deliverable. To demonstrate this to a Planning Inspector at the Local Plan Examination, we require certainty on which option is being progressed by the Council as the landowner. The removal of the site allocation does not prevent the options being looked at from coming forward and policies in the Local Plan continue to protect the market, support improvements to the facilities at the market and its public realm as well as support a range of uses that may come forward on the site.</p>
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## Young Commissioners Summary

A workshop was organised for young people at Stratford Youth Zone on 18<sup>th</sup> February 11:00 - 14:00, with Young Commissioners. The Young Commissioners are young people who been in care or have been in care, aged 13-18 they have first-hand experience and knowledge of care pathways to reshape and redesign services for children in care. During the session, the Planning Policy Team worked with the Young Commissioners to review and contribute to the writing of the Vision and Objectives in the Local Plan.

The feedback from the twelve Young Commissioners has been summarised and condensed into key themes and messages. The comments have been presented by what participants suggested should remain and what should be changed. Then, amendments to the Vision and Objectives based on suggested changes have been recorded, referencing where these changes have been added to the Local Plan.

### Young Commissioners Workshop - Key Themes taken from Exercise 1

Theme	Workshop Comments
<b>Crime</b>	<ul style="list-style-type: none"> <li>• Need safer streets, this will encourage residents to be out more</li> <li>• Increased use of streets and public spaces will reduce crime</li> <li>• Improve street lighting and surveillance</li> </ul>
<b>Streets and Open Spaces</b>	<ul style="list-style-type: none"> <li>• More trees, allotment space and quiet spaces</li> <li>• Inclusive and safe parks and open spaces</li> <li>• Improve the appeal of parks to young people</li> <li>• Keep streets clean and roads well-maintained</li> <li>• More bins needed to reduce litter</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Provide adequate affordable housing</li> <li>• Provide more housing options for homeless people</li> <li>• Affordable homes – who are they affordable for?</li> <li>• Improve the quality of housing for all</li> <li>• Housing needed for existing and lower-income residents</li> </ul>
<b>Connectivity and Sustainability</b>	<ul style="list-style-type: none"> <li>• Improving access to cycling and safe routes</li> <li>• Support for 15-minute neighbourhoods</li> <li>• Encourage walking to improve accessibility, mobility and safety</li> <li>• Improve public transport connections</li> <li>• Need Net-zero development</li> <li>• Support for Eco-friendly/electric buses</li> </ul>
<b>Diversity and Inclusion</b>	<ul style="list-style-type: none"> <li>• Jobs for local people</li> <li>• Overuse of the word 'fairer'</li> <li>• Inclusive social and public spaces</li> <li>• Involvement of community in engagement</li> <li>• Remove the technocratic use of words to improve the inclusivity of plans</li> <li>• Ensure current and old residents aren't ignored</li> <li>• Need accessible shops</li> <li>• A focus to include young people in the Local Plan</li> </ul>
<b>Opportunities for young people and employment</b>	<ul style="list-style-type: none"> <li>• Importance of employment opportunities</li> <li>• Need creative spaces</li> <li>• Need study spaces/libraries</li> <li>• More spaces for young people</li> <li>• More focus on young people in the vision</li> </ul>

	<ul style="list-style-type: none"> <li>• Need spaces for local businesses to grow</li> <li>• Skills and career development is important</li> </ul>
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**Young Commissioners Workshop – Workshop comments on what should remain in the Vision and Objectives taken from Exercise 2**

Theme	Workshop Comments
<b>Crime</b>	<ul style="list-style-type: none"> <li>• Reduction in crime and fear of crime</li> </ul>
<b>Streets and Open Spaces</b>	<ul style="list-style-type: none"> <li>• Increasing/upgrading public places for young people</li> <li>• Clean, safe and attractive streets</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Deliver sufficient homes</li> <li>• Improve housing quality</li> </ul>
<b>Connectivity and Sustainability</b>	<ul style="list-style-type: none"> <li>• Support for 15-minute neighbourhoods</li> <li>• Walking helps to reduce emissions and improves street safety</li> <li>• Zero carbon development</li> </ul>
<b>Diversity and Inclusion</b>	<ul style="list-style-type: none"> <li>• Celebrating the borough where creativity, diversity an inclusive economy and community spirit can flourish</li> <li>• Social integration in new developments</li> </ul>
<b>Opportunities for young people and employment</b>	<ul style="list-style-type: none"> <li>• New spaces for businesses to grow</li> <li>• Skills and career development and helping young people with their future</li> <li>• Supporting cultural events, spaces and businesses</li> </ul>

**Young Commissioners Workshop – Workshop comments on suggested changes to be made to the Vision and Objectives taken from Exercise 2**

Theme	Workshop comments	Amendments to the Vision and Objectives: Yes or No
<b>Crime</b>	<ol style="list-style-type: none"> <li>1. Need safer streets</li> <li>2. Improve street lighting and surveillance</li> </ol>	<ol style="list-style-type: none"> <li>1. No: This is already addressed in Para. 7 of the Vision</li> <li>2. No: Objective 4 already addressed this point outlining a wider strategy for safer streets</li> </ol>
<b>Streets and Open Spaces</b>	<ol style="list-style-type: none"> <li>1. Provide more green, safe and inclusive open spaces</li> <li>2. Provide open spaces for old and existing residents</li> <li>3. Improve the quality of streets: clean streets and no potholes</li> </ol>	<ol style="list-style-type: none"> <li>1. Yes: The wording Inclusive parks was added to Para. 6 of the Vision</li> <li>2. No: Objective 3 already addresses accessibility to open spaces for the public</li> <li>3. No: Clean streets is already addressed in Objective 3, and potholes are</li> </ol>

	<ol style="list-style-type: none"> <li>4. Allocating more bins for cleaner streets</li> </ol>	<p>considered too specific for this section of the Local Plan</p> <ol style="list-style-type: none"> <li>4. No: Increasing the number of bins is considered too specific a solution in this section of the Local Plan</li> </ol>
<b>Housing</b>	<ol style="list-style-type: none"> <li>1. Clearer about allocations of new housing</li> <li>2. Getting homeless people into an affordable housing scheme</li> <li>3. Affordable homes, are they for the rich or poor?</li> <li>4. Providing housing which allows young people to stay in Newham</li> </ol>	<ol style="list-style-type: none"> <li>1. No: The allocation of homes isn't something the Local Plan can influence. The types of homes that should be built in the borough is included and covered under objective 5.</li> <li>2. No: Delivering sufficient homes to meet the needs of Newham residents is already addressed in Objective 5, including those who are homeless</li> <li>3. No: The need for homes to meet our most pressing needs is already addressed in Objective 5</li> <li>4. No: The plan to deliver homes for the diverse needs of our population is already addressed in Objective 5, which supports the need for homes so young people can stay in the borough.</li> </ol>
<b>Connectivity and Sustainability</b>	<ol style="list-style-type: none"> <li>1. Improve accessibility of cycling</li> <li>2. Make transport more accessible for young people</li> <li>3. Improve green transport e.g. Electric buses</li> <li>4. Make neighbourhoods more accessible</li> <li>5. Ensure all transformation is eco-friendly</li> <li>6.</li> </ol>	<ol style="list-style-type: none"> <li>1. No: The accessibility cycling is already addressed in Objective 3 by encouraging active travel</li> <li>2. Yes: Improved accessibility of transport for young people has been added to Objective 6</li> <li>3. Yes: The improvement of green public transport was added to Objective 3</li> <li>4. No: The accessibility of neighbourhoods is already addressed in Objective 3</li> <li>5. No: Transformation through zero carbon development is already addressed in Objective 3</li> <li>6.</li> </ol>
<b>Diversity and Inclusion</b>	<ol style="list-style-type: none"> <li>1. The use of the word 'fairer' with equity as different people need different things</li> <li>2. Highlight the need for a more equitable society</li> <li>3. Make language less technocratic and more inclusive in the Vision and Objectives</li> <li>4. Ensure current and long-standing residents aren't ignored</li> <li>5. Add more about diversity in the vision</li> </ol>	<ol style="list-style-type: none"> <li>1. No: The use of the word 'fairer' is taken Newham's Corporate Plan, so will remain for consistency</li> <li>2. No: This creation of a more equal borough is already addressed in Objective 7</li> <li>3. No: We have tried to make the language in the Local Plan and in particular the Vision and Objectives as accessible as possible. However, as the as the document has multiple uses and needs to be used in formal</li> </ol>



	<ol style="list-style-type: none"> <li>6. Reference to cultural foods and attractions</li> <li>7. Reflect and reference Newham's Young People's Charter</li> </ol>	<p>settings, some technocratic language is required for it to be effective</p> <ol style="list-style-type: none"> <li>4. No: The existing community is already addressed throughout the Vision.</li> <li>5. Yes: Further reflection of Newham's diversity was added to Para. 4 of the Vision</li> <li>6. Yes: The range of cultures reflected in Newham's businesses was added to Para. 1 of the Vision</li> <li>7. No: The Vision and Objectives do not make overt reference to any of Newham Strategies, aside from the Corporate Plan and Newham's Covid-19 Recovery Strategy. However, it is important that the principles of the Young People's Charter are reflected in the Local Plan and we have undertaken a review to make sure this is the case (see Table 3). We have also included the Young People's Charter elsewhere in the Plan where we list key documents that influenced the Plan's development</li> </ol>
<p><b>Opportunities for young people and employment</b></p>	<ol style="list-style-type: none"> <li>1. Propose specific facilities for young people in the vision</li> <li>2. There is a neglect for young people in the Vision</li> <li>3. Create study zones for young people</li> <li>4. Promote cultural events and spaces which would support local businesses</li> <li>5. Provide spaces for young people to be creative</li> <li>6. Provide job opportunities for young people</li> </ol>	<ol style="list-style-type: none"> <li>1. No: This suggestion is too specific for the Vision and Objectives section of the Local Plan. More detail is provided in the Neighbourhoods Chapter of the Plan</li> <li>2. No: The involvement of young people in future planning is already addressed specifically in Para. 8 of the Vision and supported in Objective 6</li> <li>3. Yes: Places to study was added to Objective 6</li> <li>4. No: Cultural events and spaces are already included in Objective 7</li> <li>5. Yes: Creative spaces was added to Objective 6</li> <li>6. No: The creation of job opportunities for young people is already addressed in Objective 6</li> </ol>

A key piece of feedback from the workshop with the Young Commissioners was that the Vision and Objectives, as drafted, needed to reference the Young People's Charter. This section of the Local Plan has not made overt reference to any of Newham's strategies, aside from the Corporate Plan and Newham's Covid-19 Recovery Strategy. Therefore, a direct reference to the Young People's Charter would not be following the format of the Local Plan. However, we agree that it is important to reflect the principles of the Young People's Charter in this section, and all of, the Local Plan. The

table below looks at each principle in turn and if the Vision and Objectives, as drafted at Reg18, addresses the Young People’s Charter.

### How does the Vision and Objectives reflect the Young People’s Charter?

Principle:	Regulation 18 Vision and Objectives	Amendments to the Regulation 18 Vision and Objectives
<p><b>Change</b></p> <p>In order for things to get better they need to change – it’s a good thing! Get on board with us to create change</p>	<ul style="list-style-type: none"> <li>Change is addressed in Para. 1, of the Vision, “No other borough is being transformed at the pace and scale that Newham is experiencing”</li> </ul>	<ul style="list-style-type: none"> <li>No amendments</li> </ul>
<p><b>Health</b></p> <p>Do everything you can to support our wellbeing and be aware that this includes physical and mental health – both are really important!</p>	<ul style="list-style-type: none"> <li>Health is addressed in Objective 1, stating the importance recognising of mental and physical health in a health integrated approach to planning</li> </ul>	<ul style="list-style-type: none"> <li>No amendments</li> </ul>
<p><b>Environment</b></p> <p>Keep the whole borough clean and tidy. Recycle, aim for greener transport (i.e. walking or cycling if you can) and be more sustainable without harming the whole environment. We have to respect Mother Nature. Keep us safe where we live</p>	<ul style="list-style-type: none"> <li>The vision addresses this principle by pledging new green homes in Para. 6 and interventions to prioritise walking, cycling and green transport in para. 7</li> <li>The vision also confirms Newham’s commitment to tackling the climate emergency, pledging new development will be zero carbon and retrofitting existing developments will be supported in Para. 8.</li> <li>This principle is also met by Objective 3, addressing the climate emergency through green development</li> </ul>	<ul style="list-style-type: none"> <li>The addition of improved green public transport in Objective 3 further addresses the principle of Environment identified in the Young People’s Charter</li> </ul>
<p><b>Creativity</b></p> <p>Don’t just leave it up to us to come with great ideas!</p>	<ul style="list-style-type: none"> <li>This principle is addressed in Para. 1, of the Vision, “happier borough where creativity, diversity, an inclusive economy and</li> </ul>	<ul style="list-style-type: none"> <li>No amendments</li> </ul>

	community spirit can flourish ”	
<p><b>Relationships</b></p> <p>Get to know us and try to understand our lives – don’t make assumptions! Acknowledge that we are a big part of the community. Take us seriously and treat us with respect.</p>	<ul style="list-style-type: none"> <li>• This principle is addressed in para. 9 of the vision where collaboration with young people in particular is highlighted as vital to ensure they retain an enduring stake in their future and the borough’s</li> <li>• This is also addressed in Objective 7, where co-design principles are embedded in delivering future development</li> </ul>	<ul style="list-style-type: none"> <li>• No amendments</li> </ul>
<p><b>Diversity</b></p> <p>Ensure that everything offered to us is accessible to everyone, particularly those with special educational needs and disabilities. Make it easy for everyone so we can do things to the best of our ability. Understand that we are not all the same. We all have an equal right to participate. Remove all stigma and discrimination you find and call it out wherever you see it</p>	<ul style="list-style-type: none"> <li>• Diversity is addressed in Para. 1 of the vision, where diversity can “flourish”.</li> <li>• This is also addressed in Para. 4 highlighting the preservation of cultural heritage and diversity in neighbourhoods</li> <li>• This principle of an equal right to participate is also present in Objective 2 giving all residents access to job opportunities, education, training and skill development, objective 3 which addresses increasing access to community facilities, objective 5 which seeks to meet the housing needs of all residents and Objective 6 which includes the need to create welcoming spaces for young people</li> </ul>	<ul style="list-style-type: none"> <li>• The additional focus on Newham’s diversity was added to Para. 4 of the Vision, addressing the principle of diversity identified in the Young People’s Charter</li> <li>• The addition of Newham’s range of cultures was added to Para. 1 of the Vision, addressing the principle of diversity identified in the Young People’s Charter</li> <li>• The addition of more inclusive parks to Para. 6 of the Vision addresses the principle of an equal right to participate identified in the Young People’s Charter</li> <li>• The addition of improved accessibility of public transport for young people in Objective 6 addresses the principle of an equal right to participate identified in the Young People’s Charter</li> </ul>
<p><b>Quality</b></p> <p>Nobody is perfect, but always try to do the best you possibly can when working with us. Help us thrive by aiming for the best quality possible, whether it’s education, housing,</p>	<ul style="list-style-type: none"> <li>• Quality is addressed throughout the vision as a commitment to improvements, ambition and enhancements across the borough</li> <li>• This principle is also present in Objective 5, which addresses improving housing quality in the borough</li> </ul>	<ul style="list-style-type: none"> <li>• No amendments</li> </ul>

<p>facilities, opportunities or anything else.</p>		
<p><b>Community</b></p> <p>View young people as a positive within the community. Include us in activities and decision making. Respect our friendship networks and communities, as well as the joy and value these bring to us all.</p>	<ul style="list-style-type: none"> <li>• Addressed in Para. 1 of the vision, “an inclusive economy and community spirit can flourish”</li> <li>• Objective 2 also addresses this principle pledging an inclusive economy, and reiterated in Objective 7 cultural events, spaces and businesses will be supported</li> </ul>	<ul style="list-style-type: none"> <li>• No amendments</li> </ul>
<p><b>Keeping Us Safe</b></p> <p>Ensure we are safe wherever we are in our community, in our homes, parks, schools, leisure facilities as well as online. Take our concerns seriously and support us where we need help.</p>	<ul style="list-style-type: none"> <li>• This principle is addressed in Para. 7 of the vision, which addresses making Newham a safe and enjoyable place to move around</li> <li>• This principle is also addressed in Objective 4, making the reduction of crime and fear of crime by creating safe spaces and streets through secured by design and activation principles</li> </ul>	<ul style="list-style-type: none"> <li>• No amendments</li> </ul>
<p><b>Privacy</b></p> <p>Give us ownership and control of our information and data. Do not share information about us without our permission.</p>	<p>N/A</p>	<ul style="list-style-type: none"> <li>• No Amendments</li> </ul>
<p><b>Independence</b></p> <p>Always do your best to help us have opportunities to learn, grow and have fun as well as keeping safe whether it is for leisure, employment, education or training.</p>	<ul style="list-style-type: none"> <li>• This principle is addressed in Objective 6, promising places and social infrastructure for young people to provide them with skills and career development. Helping them to get the best start in life and reach their potential</li> </ul>	<ul style="list-style-type: none"> <li>• The addition of creative spaces for young people was added to Para. 1 of the Vision, further addressing the principle of independence identified in the Young People’s Charter</li> </ul>

## Appendices:

### Appendix 1: Co-create Email

#### **Get involved in shaping the future of Newham through the Local Plan Review.**

We are contacting you to let you know that the second round of consultation (Regulation 18) for the **Newham Local Plan Review** has formally begun and we want to hear your opinion.

During the Issues & Options Consultation in 2021, you told us what was important to you and what changes you wanted. We have written updated policies based on your responses, and now you can provide further feedback on the Draft Local Plan.

**For all of you that provided responses during the Issues and Options consultation, please see a summary of your response in the [Consultation Report](#).**

The Newham Local Plan is the **key planning document** which the Council uses to assess planning applications and to manage where regeneration and development happen in Newham, what it is used for, and what it looks like.

The Local Plan includes policies on **housing, employment, climate, greenspaces, town centres, design, community facilities, and transport**. As part of developing a new Local Plan, the Council is proposing changes to your neighbourhood through 16 context-specific neighbourhood policies with proposed uses for site allocations.

#### **Have your say!**

There are lots of different ways to be involved. Visit [Newham Co-Create](#) where you will be able to:

- **Read** the Draft Newham Local Plan.
- **Submit comments** and feedback.
- Sign-up to our online and in-person [events](#).

Alternatively, **hard copies** of the Draft Newham Local Plan and response form can be found at all local libraries.

We want to give everyone the opportunity to have a say on the Newham Local Plan Review. Please contact us for any queries via email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to Newham Dockside, 1000 Dockside Road, E16 2QU.

**Have your say before 20 February 2023.**



# Newham Recorder

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Have your say  
on extension  
proposal



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## Doctor worked shifts while on sick leave

Medic who also worked overlapping shifts 'had potential to compromise patient safety' and has been suspended for six months

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# WE ARE PLANNING.



**PLANNING FOR THE FUTURE OF NEWHAM: HAVE YOUR SAY WE WANT YOUR VIEWS ON HOW NEWHAM SHOULD BE DEVELOPED OVER THE NEXT 15 YEARS THROUGH OUR LOCAL PLAN CONSULTATION. SO HAVE YOUR SAY AND HELP US SHAPE OUR PLANNING POLICIES FOR THE BOROUGH.**

**The Local Plan decides where homes, shops, health centres and much more will be built across the borough, as well as setting out:**

- The location, amount and type of development in the borough.
- The standards that development should meet.
- What development should look like.
- What services and infrastructure are needed and where.
- How all residents will benefit from the growth and development.

Mayor Fiaz said: "It is vital such plans about the future of our borough are made with residents at the heart of decision making. I want to make sure our plans for the next 15 years are truly people powered.

"Residents know best what it is like to live, grow up and work in Newham, which is why the Local Plan Review needs their expertise on the issues that are important and their ideas on how to solve them."

To take part in the consultation visit [www.newhamcreate.co.uk](http://www.newhamcreate.co.uk) Queries can also be made via email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk) or by post to: Local Plan

Review, Newham Dockside, 1000 Dockside Road, E16 2QU.

This is the second stage of consultation, following resident feedback in 2021 which led to new policies being drafted.





## Appendix 4: Public Notice

newhamrecorder.co.uk January 4, 2023 COMMUNITY VIEW 10

# Start thinking about future

As we celebrate the beginning of a new year, it is traditional to pause and take stock of the past. It is also a great opportunity to look ahead and plan for the future.

If you are currently in Year 11, it may seem like you have little time to think about your future. However, the decisions you make now can have a significant impact on your future. It is important to think about how the choices you make now will help you to realise your career ambitions.

It is also essential to have an open mind and explore your options when it comes to vocational courses such as T Levels. These courses are designed to give you a work placement experience that is equivalent to a Level 3 apprenticeship or a Level 2 apprenticeship in a London area. They are designed to give you the skills and experience that employers are looking for, and they can help you to gain a head start on your career.



Year 11 students should visit open days like those held at NewVic. Picture: NewVic

As you think about your future, it is important to remember that you have many options. You can choose to go to university, or you can choose to start a career. There is no right or wrong answer. The important thing is to think about what you want to do and what you are good at. You should also think about the skills and experience that you need to succeed in your chosen field.

Finally, don't forget to ask for help. There are many people who can help you to think about your future. Your teachers, your parents, and your friends can all offer advice and support. You should also look for opportunities to visit open days and talk to people who are already working in your chosen field. This can help you to get a better idea of what it is like to work in that industry and what you need to succeed.

# Cricket welcomes refugees

**WELCOME** to say first column of the new year.

The charity partner Capital Kids Cricket has been successful in securing a programme to include children for refugee groups in East London and beyond, thanks to funding from the City of London Corporation's Refugee Resettlement Fund.

The cricket sessions provide a unique opportunity for children to develop new friendships, learn new skills and enjoy the outdoors.

The programme is run by the charity, which has been working with the City of London Corporation to secure funding for the sessions. The sessions are held at West Ham Park, which is a safe and welcoming environment for children.

The sessions are held every week, and they are open to children of all ages and abilities. The sessions are run by experienced coaches, and they provide a fun and engaging environment for children to learn and play.

The sessions are held at West Ham Park, which is a safe and welcoming environment for children. The sessions are run by experienced coaches, and they provide a fun and engaging environment for children to learn and play.

City of London Corporation's Open Spaces and West Ham Park Commissioners Chair, **Caroline Haines**, comments: "We are pleased to support this programme, which provides a valuable opportunity for children to develop new friendships and learn new skills. We are also pleased to support the charity, which has been working hard to secure funding for the sessions."



West Ham Park welcomes 2023. Picture: ELLIE HOSKINS

newhamrecorder.co.uk January 4, 2023 11

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**Newham Local Plan Review- Notice of Engagement**

The London Borough of Newham is refreshing the adopted Newham Local Plan (2018) so we can plan for the next 15 years and deliver our key objectives: inclusive growth, building a fairer Newham, and addressing our climate emergency.

The Local Plan is the key planning document that the Council uses to assess planning applications, and to manage where regeneration and development happen in Newham, what it is used for and what it looks like.

Through this refresh, the Council is also including the part of the borough where the London Legacy Development Corporation (LLDC) currently develops planning policy and makes decisions on planning applications. Planning powers for this area will be handed back to boroughs by the end of 2024. The Council is working with the LLDC and other partners so that this new Local Plan can include policies for the whole borough, in time for the handover date.

The Draft Newham Local Plan has been published to allow comments to be made prior to developing the Submission Local Plan. The Plan has considered and included all the feedback from residents obtained during the Issues and Options consultation in Autumn 2021, alongside findings from up to date evidence base documents.

Comments can be submitted until **20th February 2023**.

Visit [newhamco-create.co.uk/en/folders/newham-local-plan-review](http://newhamco-create.co.uk/en/folders/newham-local-plan-review) to find details of the consultation events and submit comments. Comments can also be sent by email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to **Newham Dockside, 1000 Dockside Road, E16 2QU**. Paper copies of the Draft Newham Local Plan can be found at all local libraries during normal opening hours.

If you want to be kept updated on the Local Plan Review, sign up to the Local Plan mailing list via [www.newham.gov.uk/localplan](http://www.newham.gov.uk/localplan) or email [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk) or call 0208 430 2000 for any additional queries.

**BUILDING A FAIRER NEWHAM**





# WE ARE NEWHAM.

# WE ARE SHAPING.



# OUR LOCAL PLAN.

**Get involved in shaping the future of Newham through the Local Plan Review.**

**The Local Plan is the key planning document the Council uses to assess planning applications and manage where regeneration and development will take place in Newham over the next 15 years.**


At the end of last year we held our first consultation and you told us what was important to you about housing, community facilities, high streets, our local environment and tackling the climate emergency, and how you wanted Newham to change. We have listened to your feedback and written new policies based on your responses.  
**Now you can provide further feedback on the Draft Local Plan.**




**WE ARE NEWHAM.**




### How can I get involved?



**Online**  
Use the QR code to visit Co-Create and read and comment on the Draft Local Plan.




**At our libraries**  
Read the Draft Local Plan at all local libraries and provide feedback through the printed questionnaire.



**Come to one of our events**  
Come to one of the following events to find out more and provide your feedback.

You can also get in touch with us to provide your comments via email at [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to **Newham Dockside, 1000 Dockside Road, E16 2QU**, or by phone on **0208 430 2000**.

Use the QR code to find more information and in different languages.




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 Read more about the Local Plan in different languages.

Event	Dates	Location and Address
Local Plan Online Event	Monday 16 January 6.30 - 7.30pm	Online – use the QR code to register on Co-Create for more details
Forest Gate and Maryland Local Plan Assembly	Thursday 19 January 6.30 - 8pm	Forest Gate Learning Zone 1 Woodford Road E7 0DH
Custom House and Canning Town Local Plan Assembly	Tuesday 24 January 6.30 - 8pm	Custom House and Canning Town Neighbourhood Centre 18 Rathbone Market E16 1EH
Manor Park Local Plan Assembly	Thursday 26 January 6 - 7.30pm	Jack Cornwell Community Centre Jack Cornwell Street E12 5NN
Local Plan Drop-In Session	Saturday 28 January 11am - 1pm	East Ham Library 328 Barking Road E6 2RT
Beckton and Royal Docks Local Plan Assembly	Tuesday 31 January 6.30 - 8pm	Royal Docks Learning & Activity Centre Albert Road E16 2JB
Plaistow Local Plan Assembly	Thursday 2 February 6 - 7.30pm	Plaistow Library North Street E13 9HL
Green Street Local Plan Assembly	Monday 6 February 6.30 - 8pm	Katherine Road Community Centre 254 Katherine Road E7 8PN
Stratford and West Ham Local Plan Assembly	Wednesday 8 February 6.30 - 8pm	Hopkins Room, Stratford Library 3 The Grove E15 1EL
East Ham Local Plan Assembly	Thursday 9 February 6 - 7.30pm	East Ham Library 328 Barking Road E6 2RT

**Have your say before 20 February 2023**

**#NewhamLocalPlan**



## Appendix 6: List of representors (excluding residents)

Statutory Consultees	<ul style="list-style-type: none"> <li>• Barking and Dagenham Council</li> <li>• City of London</li> <li>• Department for Education</li> <li>• Environment Agency</li> <li>• Greater London Authority</li> <li>• Historic England</li> <li>• LB Redbridge</li> <li>• LB Waltham Forest</li> <li>• LLDC</li> <li>• Marine Management Organisation</li> <li>• Metropolitan Police Service</li> <li>• National Grid</li> <li>• National Highways</li> <li>• Natural England</li> <li>• NHS North East London</li> <li>• Port of London Authority</li> <li>• Sport England</li> <li>• Thames Water</li> <li>• The Coal Authority</li> <li>• Theatre Trust</li> <li>• Transport for London</li> <li>• Woodland Trust</li> </ul>
Community Groups' Representatives	<ul style="list-style-type: none"> <li>• Anjumnan E Islahul Muslimeen (London) Uk Trust Ltd</li> <li>• Climate You Change</li> <li>• Eco7</li> <li>• Friends of Queens Market</li> <li>• Friends of West Ham Park</li> <li>• Green Street Traders Association</li> <li>• Manor Park Pop Up Market</li> <li>• Newham Cyclists</li> <li>• Newham Homelessness Forum</li> <li>• Newham New Deal Partnership</li> <li>• One Newham</li> <li>• Plashet Park</li> <li>• River Roding Trust</li> <li>• Shelter</li> <li>• Surge Cooperative Limited</li> <li>• Swifts Local Network</li> <li>• West Silvertown Foundation</li> </ul>
Developers/Landowners	<ul style="list-style-type: none"> <li>• Abrdn</li> <li>• Albert Island Regeneration Limited</li> <li>• Anchor</li> <li>• Aston Mansfield</li> <li>• Ballymore Group</li> <li>• Ballymore</li> <li>• Barratt London</li> </ul>

	<ul style="list-style-type: none"> <li>• Beckton Alp Real Estate Ltd</li> <li>• Bellway Homes Limited</li> <li>• Berkeley Homes Limited</li> <li>• Caxton Street North Limited</li> <li>• DB Cargo (UK) Ltd</li> <li>• D P K Management</li> <li>• Finebeam Ltd</li> <li>• GLP</li> <li>• Hadley Property Group</li> <li>• Hagley Ltd</li> <li>• Hollybrook Homes</li> <li>• IQL South</li> <li>• IXDS Ltd</li> <li>• IXO LLP</li> <li>• LAMIT c/CCLA Investment Management Ltd</li> <li>• Landhold Developments Ltd</li> <li>• L&amp;Q</li> <li>• LCR</li> <li>• Lidl</li> <li>• London City Airport</li> <li>• London Markaz Abbey Mills Trust Land</li> <li>• Millenium Group</li> <li>• Network Rail</li> <li>• Newham 6<sup>th</sup> Form College</li> <li>• Notting Hill Genesis</li> <li>• Poplar HARCA</li> <li>• Redefine Hotels Portfolio IV Ltd</li> <li>• Royal Docks Team</li> <li>• Sainsbury's Supermarkets Ltd</li> <li>• SEGRO Plc</li> <li>• Silvertown Homes Ltd</li> <li>• Stratford City Business District Limited</li> <li>• Stratford East London Partners LLP</li> <li>• St Williams Homes LLP</li> <li>• Tate &amp; Lyle Sugars</li> <li>• Transport Trading Limited Properties Limited</li> <li>• Vasint BV</li> <li>• Unibail-Rodamco-Westfield</li> <li>• Unite Group Plc</li> <li>• University College London</li> <li>• University of East London</li> <li>• UrBox Beckton Limited</li> <li>• Watkins Jones Group Plc</li> <li>• Wm Morrison Supermarkets Ltd</li> <li>• Zirconia Stratford Unit Trust</li> </ul>
Elected Officials	<ul style="list-style-type: none"> <li>• Councillor Anamul Islam – Forest Gate</li> <li>• Councillor Areeq Chowdhury – Beckton</li> <li>• Councillor Carolyn Corben - Maryland</li> <li>• Councillor James Beckles – Custom House</li> <li>• Councillor Madeleine Sarley Pontin – Forest Gate</li> <li>• Councillor Susan Masters – East Ham</li> </ul>

	<ul style="list-style-type: none"><li>• Stephen Timms MP – East Ham</li></ul>
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## Appendix 7-21: Comments and responses Tables

The Comments and responses tables will be provided alongside this consultation report, broken down by chapters of the Local Plan. These tables display all of the comments submitted as part of the Local Plan consultation and our responses.

Please note, a number of representation responses refer to the delivery of 15 minute neighbourhoods or 15 minute neighbourhood principles or 15 minute neighbourhood concept. The intention behind this objective is to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.