

From: [Joy-Caron Canter](#)
To: [Local Plan](#)
Cc: [REDACTED]
Subject: Re: Local plan response-form-final.docx
Date: 23 September 2024 21:41:03
Attachments: [image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)
[image0.jpeg](#)
[image1.jpeg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)

Thank you very much for your response - as well as still forwarding our response for consideration.

Please see below - it just kept sending me in circles - to reset password- which never came through. I tried setting up a new account & it said email already connected to an account.

I also cannot connect to our PPP project which is on the co-create platform - so I will speak to the team on how I can resolve this.

Thank you



Regards

Joy-Caron Canter
Network Coordinator
One Newham & Sustainable Newham
Working days Monday - Thursday
Registered Charity no. 1181534

One Newham is a partnership network for the voluntary, community and faith sector.

Sign up for free to become a member of One Newham:

<https://forms.gle/hiCCUVezSujnQfh9A>

On 23 Sep 2024, at 12:01, Local Plan <LocalPlan@newham.gov.uk> wrote:

Many thanks for submitting a response to our Local Plan Review consultation.
The Regulation 19 Consultation closed at 5pm last Friday (20 September 2024).
Your email was received after the deadline and will be considered as a late response. Please note that your response will still be processed but it will be at the discretion of the Inspector if they want to see or consider any late responses.

If you wish to show your attempts to submit representation before the consultation deadline, please forward your error message or any evidence to help us verify the

issue you experienced.




Sign up to our [database](#) if you would like to be kept updated about future consultations and receive the Consultation Report once it is finalised.

Best regards,

 | **She / Her**
Senior Planner | Planning Policy
London Borough of Newham
Newham Dockside | 1000 Dockside Road, London E16 2QU
Phone Number 020 3373 3075
newham.gov.uk



Read more about our Building a Fairer Newham plan [here](#) and watch [here](#).

From: Joy-Caron Canter 
Sent: 20 September 2024 19:39
To: Local Plan <LocalPlan@newham.gov.uk>
Cc: 


Subject: Local plan response-form-final.docx

Dear Ellie & Naomi

I have been trying to submit this online since this morning (just logging into the system has been impossible) & I emailed to the local plan email this afternoon & have just noticed an error message on that!)

Most of what is included I know you have had from others - however the points on green & water and the climate action are new.

Everything is collated from our members & residents. It is more for connect anyway & generally people think the plan is a step in the right - they just do not have faith that it will be followed through (as many previous plans)

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Newham. The views expressed in it are not necessarily the views of any of the councils.

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Sara Chiong

From: Joy-Caron Canter [REDACTED]
Sent: 20 September 2024 19:39
To: Local Plan
Cc: [REDACTED]
Subject: Local plan response-form-final.docx
Attachments: Local plan response-form-final.docx

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ellie & Naomi

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Response Form for Regulation 19 Consultation.

	<p>Local Plan Publication Stage Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>		
Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Joy-Caron"/>	<input type="text"/>
Last Name	<input type="text" value="Canter"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Network Coordinator"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="One Newham"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Line 3	<input type="text" value="██████"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="██████████████████"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

One Newham

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy North Woolwich

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Observations on the draft revision to the Newham Local Plan 2024

These notes mainly relate to the North Woolwich Neighbourhood but the underlying points related more widely to policies and plans across Newham and how they are evidenced and ultimately delivered - having aspirations that are unlikely (even *if* possible) is not good strategic planning and gives rise to the potential for non-holistic impact analysis and decision making.

There are also numerous examples where the reality on the ground is not accurately reflected in some of the maps and data sets that have been used as the foundation for devising the new policies and delivery approaches.

The justification to spit out Albert Island from the North Woolwich area does not seem to be well evidenced especially given that this area is industrial (so has no impact on / input to the proposed Local Centre at Royal Albert Wharf but does include some housing provision that will remain in the the North Woolwich area - this runs the risk of diverting the benefits arising from this area away from North Woolwich and serves to further isolate the South East quadrant of the Royal Docks area which is already excluded from most of the Enterprise Zone and Opportunity Area activities.

Why doesn't the Albert Island Enterprise Zone area have a site allocation (even given that it is a GLA led redevelopment) it still contributes to the wider area in terms of benefits and impacts - not least with respect to timing of the delivery and disturbance during the delivery phase that will add to the severance faced by North Woolwich?

What action is being taken to improve PTAL ratings in this area and to provide enhanced connectivity to West Silvertown (re-establishing a link that was severed with the arrival of the Elizabeth Line) especially given the amount of new facilities being delivered in the West Silvertown area? Only having one bus route serving the Eastern end of the area which is often impacted by local area traffic problems does not encourage modal shift.

Several statements are made about the lack of access to the river frontage are inaccurate - there is a riverside path that runs West from the Royal Victoria Gardens park for ~ 360m but the route is fragmented, a low quality environment and can feel unsafe plus it ends abruptly at the boundary of the Silvertown Industrial area.

Further, there is also a pathway that runs East from RVG park with good access as far as the King George V Lock which also continues to Royal Albert Wharf although the latter stage is less accessible, lower quality and less safe.

The plan also states there is one Bus Garage in the area where in fact there are two and the presence of strategic waste processing facilities (that are key sites designated as part of the East London Waste Management Plan) are completely omitted but should be included - even though they are not "good" neighbours.

The former North Woolwich Station building is actually owned by a Church Group and operates as such (in some fashion) but the references in the document don't

acknowledge this - but whether this use continues as a consequence on the owners failing to secure planning permission remains to be seen.

The NW Neighbourhood in particular is fragmented and massively constrained by physical geography and infrastructure which limits travel routes and potential for added value whilst also having limited retail provisions (of which some are of lesser quality) thus forcing increased levels of out-of-area spend - hard to trigger behavioural change but also some questions as to the quality of the base data (specifically relating to misclassification in the Priority Places for Food Index mapping).

Given the physical landscape constraints, how are new, safe, green routes going to be provided - where will these be and what will be lost to facilitate their introduction?

Why is no mention made of restoring and increasing access to the Dock edge at King George V Dock (subject to obvious constraints regarding Airport security needs) especially as CADP permission refers to the provision of a pathway and pocket park - why are these not explicitly included in the document?

NW Vision 6 - the concept of buffering is fine if it can and is done - evidence to date shows it rarely happens due to lack of land space in a congested and constrained area - how are you going to achieve this in reality?

NWV 8 - what impact with industrial intensification have and how will these be mitigated in terms of noise, traffic and pollution and overloading of location facilities, especially in relation to public transport and retail?

NWV 10 - How will this be achieved and will the promotion of outward flows of items be done? What will be done to promote lower / no carbon water based freight transport using the rivers and Docks?

NWV 11 - How will new businesses be attracted to the area to make use of the increased availability of work and retail space whilst ensuring that the products and services are actually affordable - affordable housing surrounded by unaffordable retail and service providers means that the housing isn't affordable? The shape of North Woolwich means that the Local Centre is at the limit of a 15 minute walking distance from the Eastern part of the area.

NWV 11 - is there actually a demand for additional food store provision literally next door to the existing food shop? Likely to fail to meet a viability threshold especially given that Rymill Street isn't a natural walking route from other areas of North Woolwich and there are already some empty units in the existing shopping area.

NWV 14a - How can a new bridge between Thames Road and Hartman Road be built given the existing buildings (and it is outside the NW area) and what is the demand for such a route? The Factory Road to Albert Road connection has more value but again is location constrained as most of Factory Road only has a single footpath on the Southern side and for accessible ramps would need significant space to gain the height and the same issue exists on Albert Road.

NWV 14b - Need to open access to Hartman Road East (between LCY and Galleons Point) to provide alternative access to KGV DLR Station and towards West Silvertown.

NWV 14b - Need to improve Public Transport in the whole area (not just focused on RVG Park!) as the Eastern end of the area only has 1 bus route and no longer serves West Silvertown directly. (Note - older N Woolwich residents are particularly upset about this & that they need to take a minimum of 2 buses to reach a supermarket)

NWV 15 - What does improved access actually mean? How does this link to the Thames Estuary 2100 flood defence plans for increased height levels?

NWV 15 - The Thames Path already goes to Gallions Reach along the riverside and is aligned with the Capital Ring but the current poor state of the path across Albert Island raises issues around security but in fact that gaps are not in the NW neighbourhood.

NWV 18 - The issues with air quality in part are caused by the Woolwich Ferry and the idling cars that are waiting (this problem has been worse during Silvertown Tunnel prep works and probably will continue and get worse when the tolling comes in on both tunnels), Need to ensure that traffic regulations (speed / engine off waiting / etc.) are properly enforced as residents are being disrupted by impact on bus routes.

NWV 19 - What does this actually mean for existing businesses and residents and isn't this a long-term failure of planning policy by bringing significant quantities of new residents in to an already industrial area with industries in many areas of the Southern part of the Royal Docks area, not just the Airport?! The Royal Docks Team and ExCel both deliberately focus on international markets so air travel is a key enabler so why not support and incentivise the move to newer, less noisy and polluting aircraft especially as the levels are already well below the compliance thresholds?

N1.SA1 - North Woolwich Station is seemingly only a Community Facility in name not action and is unclear what the future holds given that the planning application was rejected and the appeal was also turned down - situation made worse by the owner undertaking unauthorised works which haven't been reversed.

N1.SA1 DP - Green fringe to North of station sidings redevelopment plot isn't currently accessible and so is not an amenity and is of poor quality but early (meanwhile) use would be beneficial.

N1.SA1 DP - How is improved connectivity to the North going to be delivered through what appears to be privately owned sites or is this in reality a limited improvement by using the old track-bed to the North East corner of the wider site area which is a busy and hazardous road junction?

N1.SA1 DP - There is already a East - West route along the river although poorly maintained and unwelcoming and almost no potential for enhancement (and increased flood defence measures may further limit use / enhancement. Also, the Westward direction is a dead-end at the industrial area - need a better plan for connectivity along Factory Road which is limited by the fact that it is intensively used by HGVs. Buses and speeding vehicles.

N1.SA1 DP - given that planning approval for this site has already been granted why are so many of these elements aspirational even allowing for the funding constraints that might delay the delivery?

N1.SA2 DP - why create a new Local Centre immediately adjacent to the existing one but on the Northern side which doesn't improve access in a meaningful way for much of the existing population, especially those in or coming to developments in and around SA1?

N1.SA2 DP - key routes on the map are misleading and don't account for the fact that direct access along Pier Road to the station is the desire path unless the proposal is to close off the Eastern access (which is where the only lifts are..... when they work!).

N1.SA2 DP - In the text it refers to "main town centre" uses but is actually an extension to the existing local centre (anything else would not be policy compliant).

N3 - why is so little reference made to the Enterprise Zone on Albert Island - this is meant to be a strategic development site - albeit one which has failed to move forward in the last 18 months since the decision notice was issued or 30 months since the GLA's Royal Docks Team announced the first building would be finished by the end of 2023. Given the current status (including a lack of all the required development licences) this area remains a deserted wasteland with lost employment opportunities and a lack of resident access to open space and waterside areas. The situation is made worse by the fact the the lead developer stopped engaging with residents as soon as they had got enough ticks in boxes to satisfy the engagement requirements for the planning submission.

Overall it seems that the plans have taken limited account of what the ground reality is and what local residents want and need and having lots of aspirational elements with no clear delivery plan and no source of funding (which might have come with a closer link to the Albert island EZ redevelopment - if that ever happens!).

It is a shame that the maps include obvious errors (even if they are stylised indication layout plans) as having key routes that run to concrete walls! It undermines confidence in the entire document and demonstrates a lack of knowledge about and connection with the actual area.

The design of the feedback form discourages active participation especially given the sheer volume of information presented and even larger volumes of supporting data (some of which is misleading).

North Woolwich resident

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Part B –
Please
use a
separate
sheet for
each
representa-
tion**

One
Newham
Name or
Organisatio-
n:

3. To which
part of the
Local Plan
does this
representat-
ion relate?
(Please be
as specific
as possible)

Policy

Implementa-
tion Text

Paragraph

Policies
Map

4. Do you
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Please tick
as
appropriate

Social infrastructure

In addition to the four listed categories:

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

We would like to add a fifth - **Council and Community PARTNERSHIPS**

Especially in the current financial climate and in line with LBN's Community Wealth-building agenda, we need to maximise and multiply the resources of the council and third-sector groups. services are always stronger when they are delivered WITH and BY local people, rather than TO or FOR them.

LBN needs to recognise and assist community organisations in delivering services that it cannot afford and that can be delivered most effectively by local people at grassroots-roots level.

The People Powered Places grants were a good step in this direction but it's not primarily cash that community initiatives need.

Buildings and places are key to delivering sustainable social value and impact.

The **Social Value and Health Impact** Assessment is helpful in focussing community groups on desired outcomes but it needs to be reconfigured to encourage, rather than stifle growth.

Rental discounts for Community facilities are currently capped at 80% of a notional 'market rent.'

This is both morally and pragmatically wrong.

Even a 20% contribution of a notional 'market rent' is in effect a Charity Tax.

Charitably raised funds that could be spent on providing community services and developing charities' infrastructure are being diverted to LBN for no direct benefit to the communities they serve.

For instance, a community centre with a full management and maintenance lease, providing services the council would like to deliver but can't afford, could pay more than half a million pounds over the course of a 30-year lease. As an aging Chair of a local charity, I could never agree to burden future generations of volunteers with such a commitment.

In terms of the council's budget these amounts are insignificant but they would be crippling for local charities. Payments would

have to come out of unrestricted reserves that are the life-blood for sustainability and development of services.

To pay a rent of even £10k per year would cost charities much more to raise. Fundraisers would need to be employed in an increasingly difficult climate where grants to maintain vital services are getting harder and harder to obtain.

Should charities relinquish use of council community buildings a lost opportunity cost should be factored into the Social Value assessment.

Capital investment in council buildings by charity tenants dramatically increases the social and financial value of these assets. There would be a significant increase in cost to the council if these relationships end - even if it's just providing security for empty buildings. That's not to mention the terrible loss of community delivered social value.

100% Social Value rent relief would mean charities could use their assets to attain and maintain delivery Quality Marks. Financially penalising charities for not having such marks is self-defeating. When money is tight this is the first sort of investment to be cut.

On the other hand, genuine, intentional partnerships between LBN and community groups, could maximise resources and multiply impact. Agreed Social Value targets would ensure groups using council facilities are delivering vital and excellent services and help these groups to develop positive impact and sustainability. I would love to work in closer collaboration with LBN on this Community Wealth-building agenda.

Specific example:

NEWway/BDCA - 35 Vicarage Lane E6

This derelict ex-council call centre was used to accommodate homeless guests as part of the SWEP protocol last winter. Once the need for this provision ended in March, BDCA/NEWway were offered a two-year meanwhile lease on the building. We invested more than £10,000 cash and hundreds of volunteer hours in bringing the building back into use. It is currently housing services including our Family Hub, supporting families without recourse to public funds, food bank, food club and debt advice centre. We also offered to make spaces available for SWEP this winter, linked in with support from NEWway, based in the Bobby Moore Pavilion on Flanders Field.

LBN is actually saving money, without the need for security costs. But we were asked to pay an annual rental to LBN initially of £21,750 pa. This was later reduced to c£10.5k.

Had I have known that a rental charge was envisaged, I would never have agreed to negotiations starting with LBN. The building would still be derelict, costing LBN money and depriving our community of much needed services.

Green & Water spaces

Flanders Field.

Another example of good and vital partnership working is Flanders Field, East Ham.

This nine-acre playing field had been left to overgrow until a group of local residents took matters into our own hands and started to cut down the 4ft high grass with petrol trimmers. For the last 25 years this place has been managed by BDCA and more than £2 million has been raised to replace the pavilion, burned down by arsonists, provide a multi-use games area (MUGA) and relay part of the grass playing surface.

We have installed the only two grass cricket squares on LB Newham land and developed Newham Cricket Club that after 15 years has just been accepted as a full member of the elite Essex Hamro league.

The maintenance and running costs of Flanders Field are subsidised by income we generate through the Well Community Centre in Vicarage Lane E6 and helped with a contribution of around £25kpa from LBN towards filling the gap between income and expenditure. This small contribution from LBN helps make running Flanders Field viable and provides incredible social value.

We would like to agree a long-term lease in order to secure significant capital funding however this is currently impossible. Although running Flanders Field as a multi-use facility for our whole community is a financial LIABILITY (not a financial asset), we were still asked to pay £11kpa rent, without any commitment from LBN of on-going funding.

LBN is liable to replace the current worn-out MUGA surface, and to replace the containerised pavilion in 10-year's time at the end of its life expectancy. Does the council want to continue to work in partnership with the voluntary sector to keep Flanders Field in use as a broad community asset, share on-going revenue costs and work together to secure necessary capital investment? The alternatives would be to scrap the

restrictive covenants and sell the land off or choose to let the facility overgrow again. Either way the borough would be deprived of a vital sporting and leisure provision.

Cricket

Demand for the two grass cricket squares at Flanders Field is massively over-capacity and we desperately need more grass squares in the borough. However they are expensive to maintain and income from local people doesn't cover the maintenance costs. A massive number of volunteer hours (including my own) make maintenance possible and Flanders Field is now renowned as one of the best wickets in the Essex league.

It would be wonderful to re-provide cricket squares on development like East Ham Gasworks, alongside income generating facilities like indoor cricket nets. Newham Cricket Club players currently travel to Chingford to use indoor practice facilities. Again a partnership between LBN, the developer and the voluntary sector would spread the costs and multiply the benefits.

Newham City Farm

Newham City Farm is another example where a LBN/Voluntary sector partnership could reap immediate rewards. The farm previously cost the council huge amounts of money but its closure has created a toxic environment in the community. If this energy was harnessed into positive action, in a way I would be committed to championing, I believe that we could re-open and run the farm without any cost to LBN. In partnership with Oasis Trust, which runs two profitable city farms, we have

produced a two-year meanwhile plan that would explore whether this long-term dream is achievable. LBN's contribution would be a peppercorn rent. At Eko Pathways SEMH School, E6 we currently send pupils to Oasis' Waterloo City Farm for therapeutic education sessions. Local businesses including UEL and Buhler are also interested in supporting this project. This sort of partnership could be lauded by LBN as a great positive partnership initiative.

NEWway

I welcome the flexibility on centralising service delivery to 'town centres.' On the whole, delivering services from easily assessable locations makes sense. But in some cases the sense of belonging and offer of community support is best provided in mainly residential communities. We hope this will be true of the approved plans to redevelop Bonny Downs Church, E6 as a co-housing project in partnership with NEWway and BDCA. Our aim is to provide move-on accommodation for people experiencing homelessness, with the wraparound care and support they will need to become independent in the longer term.

As a community we are also exploring purchasing properties to provide further move-on accommodation. The difficulty is the current block on establishing HMOs. This is understandable when these are designed purely to maximise income with poor management leading to anti-social behaviour and disruption to communities.

However, with careful management and monitoring, bona fide charities such as NEWway should be able to buy and manage

homes where three or four guests can be supported into independent living and permanent work. The current Article 4 restrictions means investing in property is capped to just two people per home, which makes this plan financially unviable. The finances also rely on Enhanced Housing Benefit rates- in turn increasing the Council burden and excluding the tenant from gainful employment- as the rent is tied to support and does not encourage paid work. By increasing tenant numbers in suitable homes and using Universal Credit (and salary) for the rent, the support to tenants can be provided in existing community projects, such as Bonny Downs and NEWway. Investors are interested in this model, and talks are already in progress. This model makes the support sustainable using community assets, it is person centred rather than financially-driven and removes the reliance on Housing Benefit costs.

Again, this joint LBN/voluntary sector approach could really help many individuals flourish in independent living and reduce benefit and support costs.

We are aware of several other communities / community buildings impacted such as the garden cafe and Abbey gardens.

All of these comments are from local colleagues and residents - not our own views.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in

hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**Part B –
Please
use a
separate
sheet for
each
representa-
tion**

One
Newham
Name or
Organisation:

3. To which
part of the
Local Plan
does this
representa-
tion relate?
(Please be
as specific
as possible)

Policy -
Green &
Blue
strategy

Implementa-
tion Text

Paragraph

Policies
Map

4. Do you
consider
the Local
Plan is :

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☐

Please tick
 as
 appropriate

Green, water, play and community growing spaces

Green and Water Spaces chapter

The statistics in this chapter, relating to the amount of green, water, play and community growing spaces we have currently and the targets we set over the Local Plan period, have been refined.

Community members feel the plan does not Really not address the inequities, only fancy luxury buildings and nothing for the existing sites and spaces, no interest in pocket parks.

Still not enough green space planned - which is already much lower in lbn than other london Boroughs

Good thstvtethe is a planned growing strategy. This should also ideally ne linked to combating food poverty

West Ham Park Nursery Site

GWS1: Green spaces

Great that it will remain for this use and not housing

Biodiversity Net Gain

GWS3: Biodiversity, urban greening, and access to nature

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 (BNG).

This is something that the community garden network is focusing on and are disappointed that this is low. A target os 15 or 20% is not negligible & could make an impact - as well as being achievable

Climate emergency

Just Transition and the Climate Emergency

Policy CE1: Environmental design and delivery and Policy CE3: Embodied carbon and the circular economy

Great this is in place - needs more promotion

Overheating

Policy CE4: Overheating

More tree planting in streets needed for shade etc. this is just transition plan - but highways do not seem to be on board.

Circular Economy

Policy CE3: Embodied Carbon and the circular economy and Policy CE5: Retrofit and the circular economy

Great that this is in place - but in practice does not seem to happen . Eg use local universities such as UEL for research

(Continue on a separate sheet /expand box if necessary)

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☐ No ☐

b. the publication of the Inspector's report

Yes ☐ No ☐

c. the adoption of the Local Plan

Yes ☐ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☐ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024