

**Sara Chiong**

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**From:** [REDACTED] >  
**Sent:** 19 September 2024 11:06  
**To:** Local Plan  
**Cc:** [REDACTED]  
**Subject:** Representations to LB Newham Regulation 19 Local Plan Consultation  
**Attachments:** Response\_form\_\_Final.pdf; Reps R19 submission ISSUE.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam,

On behalf of Aston Mansfield, please find attached representations on the Regulation 19 Draft Submission Newham Local Plan.

Please can you confirm receipt.

Kind Regards,

[REDACTED]

[REDACTED]  
**Senior Planner**  
**Planning**



Savills, Runway East - York and Elder, 50 New England Street, Brighton, BN1 4AW

**Email:** [REDACTED]  
**Website:** [savills.co.uk](https://www.savills.co.uk)



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**Response Form for Regulation 19 Consultation.**

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

Newham Draft Submission  
Local Plan

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### Who we are

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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.

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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.

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# 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)

*\*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.*

Title	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Flora"/>
Last Name	<input type="text"/>	<input type="text" value="MacLeod"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="Aston Mansfield"/>	<input type="text" value="Savills"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

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

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

See accompanying document

(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.

See accompanying document

(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:

To support the inclusion of Lady Trower Trust Playing Fields as an allocated site within the adopted plan.

***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.***

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 6<sup>th</sup> September 2024**

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# **Representations to the London Borough of Newham Regulation 19 Local Plan Consultation**

September 2024

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**Lady Trower Trust Playing Fields, Burges Road, East Ham**

Prepared by:

Savills (UK) Limited  
*74 High Street, Sevenoaks, TN13 1JR*

## Contents

1.	<b>Executive Summary</b>	<b>1</b>
2.	<b>Introduction</b>	<b>2</b>
3.	<b>The Site</b>	<b>4</b>
4.	<b>Representations on the Regulation 19 Local Plan Draft</b>	<b>6</b>
5.	<b>Draft National Planning Policy Framework</b>	<b>21</b>
6.	<b>Summary</b>	<b>22</b>

Appendix A: Site Location Plan

Appendix B: Milestone Plan

Appendix C: Strategic Site Delivery Table

## 1. Executive Summary

- 1.1 These representations have been prepared by Savills on behalf of the landowner – Aston Mansfield in relation to the Lady Trower Trust Playing Fields, Burges Road, East Ham (the Site) and are submitted in response to the consultation on the London Borough of Newham (LBN) Regulation 19 (R19 ) Draft Local Plan.
- 1.2 The land at the Lady Trower Trust Playing Fields currently comprises open scrubland. It was historically used as recreational land although this use has not taken place since the mid-20<sup>th</sup> century. The Site is designated as Metropolitan Open Land (MOL).
- 1.3 Savills, on behalf of Aston Mansfield, welcomes the opportunity to comment on the Plan at Regulation 19 stage. At present, we object to the plan as currently prepared; this document sets out the reasoning behind this position and makes recommendations to the wording of some of the policies.
- 1.4 In summary, LBN currently:
- Has a five-year land supply of 2.14 years against the London Plan Targets
  - Does not have sufficient identified housing capacity.
  - Does not have the level of identified deliverable sites to meet future expected demand.
  - Has an open space deficiency across the Borough.
- 1.5 On this basis it is essential that the R19 plan is positively prepared in providing for enough housing provision and public open space over the plan period as informed by the London Plan 2021, and on a sufficient number of identified sites.
- 1.6 It is relevant to note, when considering the draft Local Plan, that on 30th July 2024, the incoming Labour Government published a consultation draft of the revised NPPF, this was also accompanied by an updated Standard Method formula and Written Ministerial Statement (WMS). The updated NPPF removes the use of the Standard Method as “*an advisory starting point for establishing a housing requirement of an area.*”
- 1.7 The updated NPPF also introduces the ‘Grey Belt’ defined as “*land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes.*”
- 1.8 Whilst MOL is a local designation to London, it is of equal status to the Green Belt and thus we would expect the Grey Belt to apply equally to MOL.

## 2. Introduction

- 2.1. These representations have been prepared by Savills on behalf of the landowner – Aston Mansfield, in relation to the Lady Trower Trust Playing Fields, Burges Road, East Ham (the Site) and are submitted in response to the consultation on the London Borough of Newham (LBN) Regulation 19 (R19) Draft Local Plan. The consultation closes on 6<sup>th</sup> September 2024. LBN is seeking responses to the specific questions contained within the document.
- 2.2. The current consultation comprises the following documents:
- Newham Local Plan - Draft Local Plan, Regulation 19 for Consultation (June 2024)
- 2.3. LBN has also published a considerable evidence base to support the R19 Local Plan consultation.
- 2.4. This consultation follows the Issues and Options Consultation which took place between the 18 October and the 17 December 2021 and included a Call for Sites and Regulation 18 consultation undertaken between January and February 2023.
- 2.5. Savills, on behalf of Aston Mansfield, has objections to the plan as currently prepared, which fails to provide enough clarity as to how the required level of housing will be provided across the identified Site allocations.
- 2.6. Savills support the increased housing target of between 51,425 and 53,784 homes between 2023 and 2038 but note the text within the main changes' summary document, which details that the target is unachievable.

*"We have increased our housing target, indicating that we are now planning to deliver between 51,425 and 53,784 homes between 2023 and 2038.*

*This change has been made to reflect emerging evidence, including revised design-led capacity testing of site allocations and projected housing delivery on small sites in the borough. Developers and the GLA also raised concerns regarding Newham not being able to meet our 2021 London Plan housing target. We considered this change was necessary in order to help meet the borough's housing target in the London Plan.*

*While we are still unable to meet our London Plan housing target, largely due to delays in site delivery, we have sought to optimise housing delivery in line with the London Plan's design-led approach and the Local Plan objective to create successful sustainable mixed-use places".*

- 2.7. LBN therefore acknowledge within the Site Allocation and Housing Trajectory Methodology Note (December 2024) that they are unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. Indeed, LBN recognise that there is currently a five-year land supply of only 2.14 years against the London Plan (2021).

- 2.8. It is essential that the LBN plans responsibly to ensure it has the land to deliver the required level of future expected growth and to accommodate the housing needs of existing and future residents and to also harness the associated economic development which comes with it.

**Aston Mansfield**

- 2.9. Aston Mansfield is an East London based charity working with children, young people, and families. The objectives of the charity are to develop the community wealth of East London and promote a diverse and inclusive society in which all are free to participate. These are achieved through a number of structured programmes and a range of activities supporting people of all ages, creeds, cultures, and abilities, principally within the London Borough of Newham.
- 2.10. Aston Mansfield funds the more significant part of charitable activities from returns on its endowment, which includes property. As officers at LBN will be aware, Aston Mansfield is able to demonstrate the charity's approach to property development from the application at Durning Hall, which includes affordable housing.



### 3. The Site

#### Description

- 3.1. This site comprises 6.08ha of land currently vacant located between East Ham to the west and Barking to the east. The site was historically utilised as a recreational ground, but it is understood that this ceased around the Second World War. It is also understood that at that time, there was development related to this use in the form of a running track, tennis courts and associated pavilion, however this use has long since ceased and this Site now comprises overgrown scrubland and grazing land, with no existing buildings present. The site is not publicly accessible.
- 3.2. The Site is located to the east of Burges Road which forms part of a large development of early 20<sup>th</sup> century terraced housing. The North Circular (A406) is located to the immediate east and its junction with the A124 to the south. A line of electricity pylons also runs along the eastern boundary.
- 3.3. A gap between 295 and 301 Burges Road provides an opportunity for vehicular and pedestrian / cycle access from the west, whilst there is a further opportunity for vehicular and pedestrian / cycle access from Watson Avenue to the north. In terms of wider connectivity, the A406 provides connections to the M11 and wider connections to the M25. In terms of public transport, tube services are available from East Ham station (District, and Hammersmith and City lines) which is located approximately 1km to the west and rail (London Overground, c2c) and tube services (District Line, Hammersmith, and City) are available from Barking Station. Bus stops are present on the A124 approximately 300m to the south. The site is therefore accessible and has good connectivity with the surrounding area through existing roads and public transport.
- 3.4. The Site is identified as being in Flood Zone 3, with the highest risk of fluvial flooding and is designated Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC).
- 3.5. The Site is not within or adjacent to a Conservation Area and does not contain or lie adjacent to any Listed Buildings or Scheduled Ancient Monuments.
- 3.6. The Site is located to the south of proposed allocation N13.SA3 Former East Ham Gasworks and shares many similar characteristics including its former recreational use and existing overgrown condition. This allocation includes a removal from the MOL.

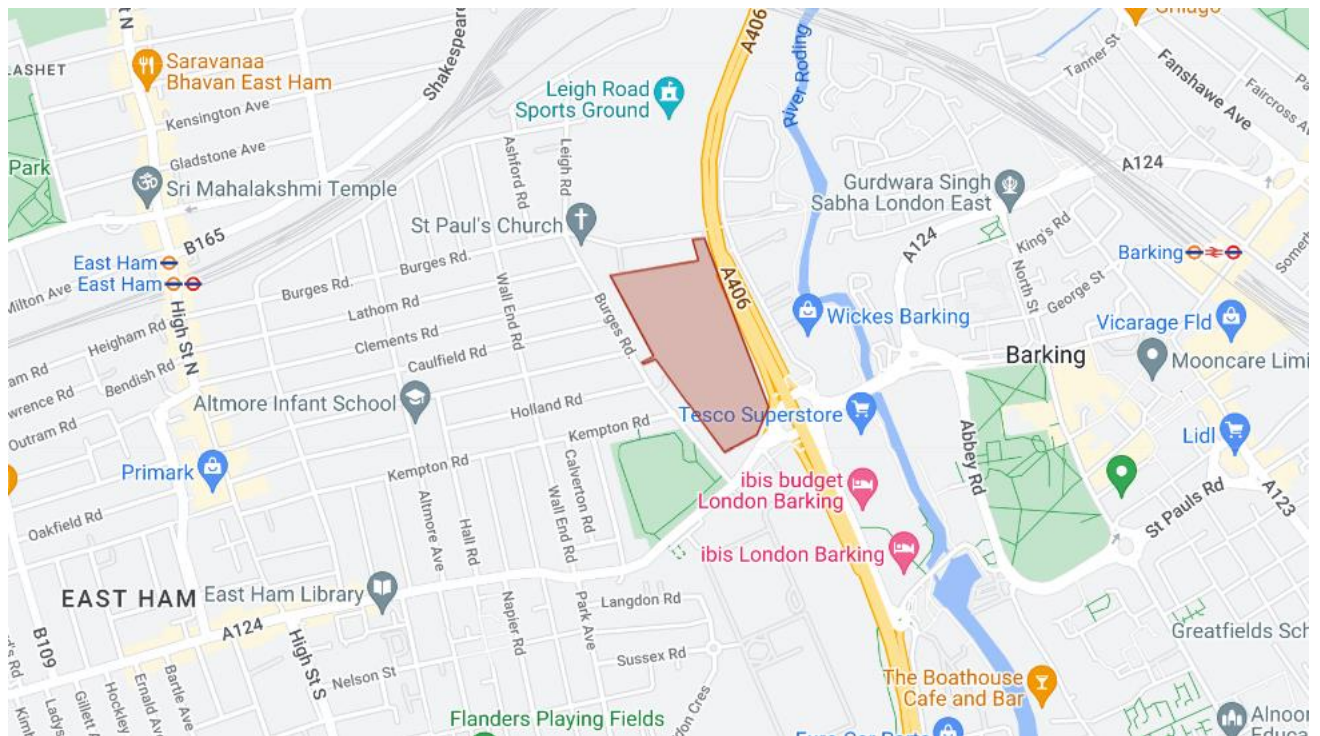
#### Opportunity

- 3.7. The Site is within the single ownership of Aston Mansfield, which itself provides a significant benefit, ensuring that no additional land assembly is required, and as a locally based charity a commitment to ensure that any scheme upon the Site delivers benefits to the wider community including an enhancement of the Green Space.
- 3.8. Aston Mansfield would be pleased to work with Newham to develop the most appropriate scheme for the Site, and would welcome the opportunity to meet and discuss the Site's potential.
- 3.9. This Site could provide circa 200 units including affordable housing. This quantum of development represents around 50% utilisation of the site area with a largely low-density flatted scheme. The remainder

of the site would be retained for publicly accessible open space and ecological enhancements. The open space areas would be located on the most accessible and environmentally beneficial areas of the Site.

- 3.10. A significant proportion of the Site could come forward as useable open space providing opportunities to maximise biodiversity net gain, create public open space, incorporate landscaping buffers, SUDS and connect green links to the surrounding areas. The Site is available immediately and as such could be realised as soon as planning permission was granted; it could be delivered quickly.
- 3.11. Historically, the Site has been used for recreational uses, and more recently for the unauthorised grazing of horses. Therefore, the risk of contamination is very low and site remediation would be minimal
- 3.12. The Milestones Plan (Appendix B) prepared by Aston Mansfield details how the Site could come forward promptly, efficiently, and sustainably, with occupations by 2028.
- 3.13. All aspects of the detailed design of the proposed development would normally be dealt with through the planning application process, although we would welcome a meeting to discuss the options for the Site prior to this.

*Figure 3.1. Site Location (See Appendix A for detailed plan) (Google Maps)*



## 4. Representations on the Regulation 19 Local Plan Draft

- 4.1. Savills, on behalf of Aston Mansfield, has provided a review of the relevant policies within the draft document. The following section is divided into the Local Plan Chapters with observations and comments provided on the draft policies.

### **GENERAL COMMENTS**

- 4.2. The Site at Lady Trower Trust Playing Fields should be, in part, removed from the MOL designation and be given a site allocation for housing.
- 4.3. London Plan Policy G3 (Metropolitan Open Land) states that *“Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.”* This is therefore the right time to undertake an MOL review.
- 4.4. MOL is given the same status and level of protection as the Green Belt, and therefore it is pertinent to refer to the NPPF Section 13, which provides the detail of this. According to Paragraph 147 of the NPPF, *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.”* This is reiterated in Paragraph 148 (a), which is about ensuring consistency with the development plan’s strategy for meeting identified requirements for sustainable development.
- 4.5. The Site at Lady Trower Trust (i.e., the proposed allocation) would result in a highly sustainable proposal that would not only increase the housing numbers, but also improve the environmental conditions of the currently degraded Site. The MOL boundary is therefore inconsistent with other Local Plan strategies in Newham (namely public open space deficiencies and housing need), and contrary to Paragraph 148(a).
- 4.6. In addition, the Paragraph 148(b) states that *“plans should... not include land which it is unnecessary to keep permanently open”*. At present, the Site provides no public benefits and therefore could be vastly improved if removed from the restrictive MOL designation, and instead allocated for housing and public open space.
- 4.7. Referring specifically to London Plan policy G3, the criteria for MOL designation is as follows:
- “1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area.*
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts, and cultural activities, which serve either the whole or significant parts of London.*
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.*
- 4) it forms part of a strategic corridor, node, or a link in the network of green infrastructure and meets one of the above criteria”*
- 4.8. Dealing with each of the above points in turn, the Site does not possess any of the features that warrants its allocation within the MOL and therefore should be removed from the MOL designation.

- 4.9. The Site is not clearly distinguishable from the development that surrounds it on all sides; residential to the north, south and west, and the North Circular to the east. The Site is not visually attractive, with electricity pylons across the site, and it can only be seen from very few locations on the surrounding residential streets. It is surrounded by residential development, and therefore is not clearly distinguishable from the built-up area.
- 4.10. The Site is not accessible to the public and therefore provides no benefits in this regard.
- 4.11. The Site provides no historical or recreational features. Whilst the Site is identified as a SINC, it is possible to demonstrate through additional studies, that appropriate development could result in net ecological enhancements.
- 4.12. The Site does not provide part of a Green Chain or link of green infrastructure and is privately owned so the public are not able to access it. The Site is bound by residential development and gas holders beyond to the north (as per site allocation) and an access road to south. As such, there is no continuous green route.
- 4.13. Considering the above, this Site should be removed from the MOL, along with Former East Ham Gasworks (allocation N13.SA3), which has also been removed in part.
- 4.14. The MOL currently represents a fragmented series of inaccessible green spaces; our Site would be better served by a comprehensive housing and open space masterplan. The benefits of a housing development on this Site alongside enhanced publicly accessible recreational facilities, would outweigh any loss of MOL and therefore the Local Plan has not been positively prepared because this balance has not been considered.

## **PART 1 (INTRODUCTION, VISION AND OBJECTIVES AND POLICIES)**

### **a. Key Diagram**

#### **Object**

The Site is marked as Green Space. This description does not reflect the fact that it is not publicly accessible, nor does it have any amenity value.

By virtue of the potential for positive change we advocate the designation of Lady Trower's Trust Playing Field alongside the former East Ham Gas works as a Transform Area, with a focus upon utilising residential development to enable the enhancement of the Metropolitan Open Land as a high quality publicly accessible space.

## **BUILDING A FAIRER NEWHAM**

### **a. BFN 1: Spatial Strategy**

Relevant Policy Text	Comment
<i>1b. supporting incremental change in the N9 West Ham, N10 Plaistow, N11 Beckton, N12 East Ham South, N13 East Ham, N14 Green</i>	<b>Support:</b> The ability of site allocations throughout the borough to support new growth.



<p><i>Street, N15 Forest Gate and N16 Manor Park and Little Ilford neighbourhoods through the enhancement of each neighbourhoods' character and the delivery of site allocations.</i></p>	<p>It would be helpful if the policy could provide an indication as to how many homes could be supported in this location.</p>
<p>2. Development will make the best use of land, optimise sites and deliver sustainable development by:</p> <ul style="list-style-type: none"> <li>a. applying a design-led approach which responds to the site's surrounding character and context; and</li> <li>b. supporting tall buildings in the borough's Tall Building Zones; and</li> <li>c. conserving and enhancing the borough's heritage assets and settings; and</li> <li>d. delivering zero carbon, climate resilient and nature-friendly developments.</li> </ul>	<p><b>Support:</b> The desire to make the best use of land.</p> <p><b>Support:</b> Addition of delivering zero carbon, climate resilient and nature-friendly developments.</p> <p><b>Suggested Change to wording:</b> Policy as currently worded could restrict higher density development where current character and context would restrict this.</p> <p>2. Development will make the best use of land and optimise sites by:</p> <ul style="list-style-type: none"> <li>a. applying a design-led approach <b>to high density development</b> across the borough that responds to the sites surrounding character and context.</li> <li>b. Supporting tall buildings in the borough's Tall Building Zones;</li> <li>c. conserving the borough's heritage assets and their settings.</li> </ul>
<p>5. Development will protect and enhance existing parks and community facilities and support the creation of new parks and community facilities by:</p> <ul style="list-style-type: none"> <li>f. the re-provision of playing pitches at N13.SA3 Former East Ham Gas Works site allocation and the Lady Trowers Trust Playing Field, through bringing them back into public use;</li> </ul>	<p>Whilst we support the provision of high-quality recreational facilities, we <b>Object</b> to the policy as currently worded.</p> <p>Public Recreational use of Lady Trower Trust Playing Fields has long since ceased and the Site now comprises overgrown scrubland and grazing land, with no existing buildings present. The Site is currently not publicly accessible. The wording of this policy is therefore misleading.</p> <p>As a charity, Aston Mansfield would be unable to provide and maintain high quality recreational facilities upon the Site in perpetuity without some form of wider enabling development scheme to fund any improvements.</p>
<p>6. Development must contribute to improving strategic and local connections and increasing active travel through improved local walking and cycling connections; the implementation of Low Traffic Neighbourhoods; new bridges over the River Lea, docks, and other barriers; the extension of the Leaway Walk, Thames Path and Capital Ring; and by reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling.</p>	<p><b>Support:</b> The desire to create Low Traffic Neighbourhoods.</p>
<p>7. Development must protect and support improvements to the borough's strategic and</p>	<p><b>Object:</b> Contrary to National Guidance.</p>

utilities infrastructure while mitigating any negative impacts	
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**b. BFN2: Co-designed Masterplanning**

Relevant Text	Comment
1. Sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure.	<b>Support</b> and recognise the importance of comprehensive masterplanning.
2. All major applications and applications on site allocations must undertake co-designed site masterplanning, through engagement with different stakeholders.	<p>Whilst the desire to engage with the varied social groups within the borough is recognised and supported, we <b>Object</b> to this policy as currently worded, which remains too broad within its requirements, does not set out how co-designed masterplanning will work in practice, particularly for larger sites and how this is evidenced as part of the application process.</p> <p><b>Suggested change to wording:</b></p> <p>2. All major applications and applications on site allocations must engage with undertake co-designed site Masterplanning as underpinned by the engagement principles contained within the Newham Statement of Community Involvement.</p> <p>3) Masterplanning must consider all of the following: a. how the required land uses and infrastructure provision on the site will be delivered. (Cont.)</p>
3. All masterplans should demonstrate how the site will support the delivery of all of the following objectives: a. increased opportunities for social interaction. b. mixed, inclusive, and stable communities. c. environments which support good physical and mental health. d. spaces young people can thrive in. e. zero carbon, climate resilient neighbourhoods. f. Inclusive design, with buildings and public spaces whose use and design reflects and meets the needs of Newham's diverse population; and g. Community Wealth Building.	<p><b>Support</b> the desire for masterplans to provide for social interaction, mixed, balanced, and stable communities, and young people, and to demonstrate Community Wealth building.</p> <p><b>Object</b> to the policy as currently worded with a lack of clarity to explain how these aims will be evidenced within the application process. The policy also requires clarity as to the size of scheme for which its requirements apply.</p> <p><b>Suggested change to wording:</b></p> <p>3. All <del>masterplans</del> major applications and applications on site allocations should demonstrate how the site will support the delivery of all of the following objectives:</p>

	<p>a. increased opportunities for social interaction through the provision of community space.</p> <p>b. mixed, balanced, and stable communities through incorporating an appropriate range of tenures and sizes of homes .</p> <p>c. environments which support good physical and mental health through the provision of well-designed homes and outdoor spaces.</p> <p>d. spaces young people can thrive in.</p> <p>e. zero carbon, climate resilient neighbourhoods.</p> <p>f. Inclusive design, with buildings and public spaces whose use and design reflects and meets the needs of Newham's diverse population; and</p> <p>g. Community Wealth Building.</p>
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c. **BFN3: Social Value and Health Impact Assessment – delivering social value, health, and wellbeing**

Relevant Text	Comment
<p>1. All developments in Newham should maximise social value and to make a positive contribution to the health and wellbeing of our communities.</p> <p>2. Major development, and proposals where potential health or social value issues are likely to arise, must undertake a screening assessment as early as possible in the development process, to determine whether a Social Value and Health Impact Assessment (SV-HIA) is required.</p> <p>3. Where the screening assessment identifies that an SV-HIA is required, then:</p> <p>a. the scope of the SV-HIA must be agreed with the Council's Planning and Public Health departments before it is undertaken by the applicant; and</p> <p>b. applicants will be required to prepare a proportionate SV-HIA as early as possible in the development process. This is to allow the scheme to deliver the maximum potential social and health gains and to mitigate any potential negative impacts.</p>	<p><b>Support</b> the aims and aspirations of the policy.</p> <p>The provision of new recreational facilities upon the Site as part of a wider residential led scheme would contribute to the aims of this policy.</p>

d. **BFN4 Developer Contribution and Infrastructure Delivery.**

No Comment.

## DESIGN

### a. D1: Design Standards

Relevant Text	Comment
<p>1. All developments should have regard to the Newham Characterisation Study (2024) and any further, relevant Council-led design guidance and/ or code and apply the following qualities of good design where applicable;</p> <p>h. Design facades with a coherent rhythm of vertical elements (entrances, windows, balconies, building breaks) and clearly identifiable horizontal elements (bottom, middle and top).</p>	<p><b>Support</b> overall aims and aspirations of the Policy.</p> <p><b>Delete:</b> Policy as worded too prescriptive and such an approach may not always respond to local context.</p>

### b. D2: Public Realm Net Gain

Policy **Supported**, and The Site provides an opportunity to meet these aims.

### c. D3: Design-led Site Capacity Optimisation

Relevant Text	Comment
<p>3. All new development and extensions should integrate with wider neighbourhood grain, scale, and massing, with scope for height increases in appropriate locations, and in line with Tall Buildings Policy D4.</p>	<p>Policy broadly <b>Supported</b>. The policy should also look to optimise density in appropriate areas providing no negative impact upon local character, in accordance with the NPPF.</p> <p><b>Suggested change to wording:</b></p> <p>3. All new development and extensions should integrate with wider neighbourhood grain, scale, and massing, with scope for <b>density and</b> height increases <b>where there is no negative impact upon local character in appropriate locations</b>, and in line with Tall Buildings Policy D4.</p>

### d. D4: Tall Buildings

Relevant Text	Comment
<p>1. Tall buildings in Newham are defined as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment, or other elements).</p>	<p><b>Comment</b> - The London Plan (2021) (Policy D9) states Tall Buildings should be defined upon local context but should <u>not be less</u> than 6 storeys.</p> <p>As an Inner London Borough, Newham should be setting a higher benchmark for tall buildings to enable more efficient use of land across the Borough.</p>



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**e. D5: Shopfronts and Advertising**

No comment.

**f. D6: Neighbourliness**

Policy **Supported**.

**g. D7: Conservation Areas and Areas of Townscape Value**

No comment.

**h. D8: Archaeological Priority Areas**

Policy is **Supported**.

Lady Trower Trust Playing Fields is located within a Tier 1 Archaeological Priority Area.  
Requirement for Desk Based Assessment in line with paragraph 194 of the NPPF.

**i. D10: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens.**

No comment.

**HIGH STREETS**

No comment.

**COMMUNITY FACILITIES**

No comment.

**INCLUSIVE ECONOMY**

No comment.

**HOMES**

**a. H1. Meeting Housing Needs**

Relevant Text	Comment
<i>1. Newham will enable a net increase of between 51,425 and 53,784 quality residential units between 2023 and 2038. This will be achieved through:</i>	<b>Support:</b> Increased housing target from between 46,633 and 52,133 homes between 2021 and 2038. (equating to between 2,743 and 3,066 homes per

<p>a. the majority of new residential units being brought forward on-site allocations; and</p> <p>b. the optimisation of housing delivery on sites below 0.25 hectares in size; and</p> <p>c. supporting residential developments that come forward on windfall sites (unallocated or undesignated land) unless other policies within the Local Plan direct otherwise.</p>	<p>year) to between 51,425 and 53,784 homes between 2023 and 2038 (equating to between 3428 and 3585 homes per year).</p> <p><b>Comment:</b> The R19 plan details that Newham will aim to deliver 3,800 homes on small sites below 0.25 hectares, this is as per the R18 plan and based upon the London Plan minimum target (<i>table 4.2</i>). We would expect a higher target upon small sites to reflect the higher overall housing aims.</p> <p>No detail is provided within the R19 plan as to the capacity of individual site allocations, or the total level of housing that would be expected to be delivered as a site allocation or upon Windfall sites.</p> <p>Housing numbers remain heavily reliant on the availability and deliverability of large strategic sites, which are notoriously difficult in terms of land assembly and thus their immediate availability and deliverability within the plan period.</p> <p>The higher housing target outlined within the R19 plan is unlikely to be met without additional housing site allocations including the strategic release of MOL land.</p>
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**b. H2 Protecting and Improving Existing Housing**

No comment

**c. H3: Affordable Housing**

Relevant Text	Comment
<p><i>Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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</i></p>	<p><b>Comment:</b> The importance of Affordable Housing is recognised, however the increase to 50% as social rented housing and 10 per cent of the total residential units as affordable ownership (60% total) within the R19 plan (up from 50% total as set out within the R18 plan), is above the London Plan target of 50% of all new homes across the capital.</p>

**d. H4: Housing Mix**

Relevant Text	Comment
<p><i>All new residential developments should deliver a mix and balance of housing types and sizes.</i></p> <p><i>Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes</i></p>	<p><b>Comment:</b> Census 2021 data details that 32% of households in Newham already have 3 or more bedrooms a figure above Inner London boroughs as a whole</p>

<i>as family housing (C3 dwelling houses) with three or more bedrooms.</i>	The NPPF requires local planning authorities to positively seek opportunities to meet the development needs of their area. It is not clear that this policy achieves this.
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e. **H5: Build to Rent Housing**

No comment.

f. **H6: Supported and Specialist Housing**

No comment.

g. **H7: Specialist Housing for Older People**

No comment.

h. **H8: Purpose-built Student Accommodation**

No comment.

i. **H9: Houses in Multiple Occupation and Large-scale Purpose-built Shared Living**

No comment.

j. **H10: Gypsy and Traveller Accommodation**

No comment.

k. **H11: Housing Design Quality**

Relevant Text	Comment
<i>6. Developments which include affordable housing should ensure: a. affordable housing is of an equivalent quality to private accommodation in terms of its location, orientation, proportion, external appearance, communal entrances, and amenity areas;</i>	Unnecessary Repetition. Part 1 refers to <i>All new residential development</i> , which should therefore include affordable housing.  Paragraph 16E of the NPPF seeks to avoid unnecessary duplication.

## GREEN AND WATER SPACES

a. **GWS1: Green Spaces**

Development upon Lady Trower Trust Playing fields will enable the aims of policy GWS1 to be achieved through the inclusion of an element of publicly accessible open space.

Relevant Text	
1. Development should provide or help to deliver easy access to a network of high-quality green spaces. This will be achieved through:	<b>Support</b> the broad principle of delivering easy access to a network of high-quality green space.
a. protecting existing open space to ensure there is no net loss, except where it meets the criteria set out in part 3 below; and	<p><b>Object:</b> Policy places blanket protection upon defined open space with no consideration of its useability or ecological value.</p> <p>The Metropolitan Open Land Site Assessment, on which this policy is based, has contradictory and misleading assertions, and needs to be revisited, particularly in relation to the Site's recreational value and 'openness'.</p>
b. maintaining the open character of Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy; and	<p><b>Object:</b> Policy should reflect the Newham Metropolitan Open Land Review 2024 which recommends some changes to MOL boundaries.</p> <p><b>Suggested change to wording:</b>  <i>maintaining the open character of <b>retained</b> Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy</i></p>
c. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing open space; and	<b>Support:</b> Opportunity to improve functionality, connectivity, quality, and accessibility of open space.
d. ensuring development next to green space does not negatively impact its functionality, quality, and accessibility; and	<b>Support:</b> Recognition that development should respond positively to open space.
e. maximising opportunities to deliver new and improved green space (including playing fields and ancillary sporting facilities), with particular focus on the locations which will experience the highest level of need over the plan period as set out in the Green and Water Infrastructure Strategy (2024) and the Playing Pitch Strategy (2024); including the requirements of the neighbourhood policies, site allocations and Local Plan Policies H11 and D2; and	<b>Support:</b> The opportunity to deliver improved open space.
g. requiring all development to consider at the earliest opportunity the form, function, and extent of green infrastructure opportunities, to maximise urban greening and improvements to Newham's network of green links as part of schemes; and	<b>Support:</b> The recognition to consider green infrastructure and improvements to green links from the outset.
2. Existing playing fields will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that:	<b>Support:</b> Ensures the protection of the highest quality playing fields, and most effective use of land.
a. the existing playing field is no longer required, as demonstrated by an assessment that the existing use is surplus to current and future needs; or	



<p>b. the development is for ancillary facilities supporting the principal use of the site as a playing fields, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use; or</p> <p>c. the development affects only land incapable of forming part of a playing pitch and does not negatively impact the pitch or ancillary facilities; or</p> <p>d. the area of playing field to be lost as a result of the development will be replaced, prior to the commencement of the development, by a new area of equivalent or better quantity and quality playing field in a suitable location; or</p> <p>e. the development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field; and</p> <p>f. no adverse harm is demonstrated in a Social Value and Health Impact Assessment (see Local Plan Policy BFN3).</p>	
<p>2. Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances where:</p>	<p><b>Object:</b> Exclusion of MOL ignores varying qualities of this land within the borough as set out within the Newham Metropolitan Open Land Review 2024</p>

**b. GWS2: Water Spaces**

No comment

**c. GWS3: Biodiversity, Urban Greening, and Access to Nature**

Aims of the policy **Supported**.

Relevant Text	Comment
<p>6. Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimised development impacts:</p> <p>a. Avoid damaging the significant ecological features of the site.</p> <p>b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site.</p> <p>c. Deliver off-site compensation, in Newham, of better biodiversity value.</p>	<p><b>Comment:</b> First sentence of GWS3.6 implies blanket protection of Sites of Importance for Nature Conservation contradicting the remaining paragraph which implies development could result in harm. Flexibility upon such land where the harm is minimised and mitigated represents the most appropriate solution to ensure housing needs are met.</p> <p><b>Suggested change to wording</b></p> <p><del>6. Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on</del></p>

d. Where appropriate compensation is not possible, planning permission will be refused.	biodiversity, the following mitigation hierarchy should be applied to minimised development impacts: a. Avoid damaging the significant ecological features of the site. b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site. c. Deliver off-site compensation, in Newham, of better biodiversity value. d. Where appropriate compensation is not possible, planning permission will be refused.
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d. GWS4: Trees and Hedgerows

Relevant Text	Comment
1. Development should protect and provide or help to deliver a network of improved tree stock and canopy cover with greater species and age diversity to ensure a healthy, balanced tree population. Over the plan period we will seek to deliver 20 per cent canopy cover, this will be achieved through: a. protecting all trees, including street trees; and b. seeking a net increase in trees on all development sites; and c. requiring an arboriculture report at the planning application stage for all developments with trees on or adjacent to the site.	<b>Object:</b> Policy implies blanket protection upon all existing trees regardless of quality. Limiting protection to category A and B trees ensures the best trees are protected whilst requirement for net increase in trees ensures overall improvement, even where a substantial number of lower quality trees are lost.  <b>Suggested change to wording:</b>  a. protecting all <b>Category A and B</b> trees where possible, including street trees;
3. Development should: c. safeguard existing trees, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during demolition and during the construction phase; and	<b>Suggested change to wording:</b>  c. safeguard existing <b>Category A and B</b> trees where possible, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during demolition and during the construction phase; and

e. GWS5: Play and Informal Recreation for All Ages

Aims of the Policy **Supported**. Development of the Site will enable the delivery of informal play and recreation facilities not currently present on the Site.

**CLIMATE EMERGENCY**

a. CE1: Environmental Design and Delivery

No comment

b. CE2: Zero Carbon development; CE3: Embodied Carbon and the circular economy; CE4: Overheating; CE5: Retrofit and circular economy; CE6: Air quality; CE7: Managing flood risk; CE8: Sustainable drainage.

No comment.

## TRANSPORT

No comment.

## WASTE MANAGEMENT

No comment

## NEIGHBOURHOODS

### a. N13 East Ham

Relevant Text	Comment
<p>The vision for East Ham will be achieved by:</p> <p>1. supporting development in 'enhance' areas that enhances the neighbourhood's character and is sympathetic to and respects the character of its historic terraced streets through form, detailing and materials. Moderate uplift in density will be supported, particularly in areas of mixed-urban form or fragmented character, where it enhances the character of the area and follows the block structure of the consolidated urban fabric;</p>	<p><b>Object:</b> Supporting development that <i>enhances the neighbourhood's character</i> should apply across the entire Neighbourhood Area.</p> <p>The policy should seek more than a '<i>Moderate uplift</i>' in density, which limits the potential of sites within locations well served by public transport to deliver new housing.</p> <p><b>Suggested revised wording.</b></p> <p>1. supporting development in 'enhance' areas that enhances the neighbourhood's character and is sympathetic to and respects the character of its historic terraced streets through <del>form</del>, detailing and materials. <del>Moderate</del> <b>An</b> uplift in density will be supported, particularly in areas of mixed-urban form or fragmented character, where it enhances the character of the area and follows the block structure of the consolidated urban fabric;</p>
<p>12. retaining existing mature trees and maximising the provision of new open space, green infrastructure, and green links and the opportunities to increase biodiversity, including through improvements to Central Park to improve biodiversity and the use of street trees particularly on High Street North, High Street South, East Avenue, North Field Road, Shelly Avenue, and Park Avenue and the use of Sustainable Urban Drainage Systems, particularly on High Street North and Church Road/ First Avenue;</p>	<p><b>Object:</b> Retention of mature trees too broad and could restrict level of development upon otherwise appropriate sites.</p> <p><b>Suggested revised wording.</b></p> <p>retaining existing mature trees <b>as far as is practicably possible</b> and maximising the provision of new open space, green infrastructure and green links and the opportunities to increase biodiversity,</p>
<p>11. securing public access to green and blue spaces currently inaccessible to the public particularly through walking and cycling routes along the River Roding in partnership with the</p>	<p><b>Support</b> desire to secure public access to green spaces currently inaccessible to public <u>subject to recreational and biodiversity improvements to these spaces.</u></p>



<p><i>London Boroughs of Redbridge and Barking and Dagenham and at N13.SA3 Former East Ham Gasworks and supporting the restoration of the Back River;</i></p>	<p>The release of the Site alongside the former East Ham Gasworks which are both currently within private ownership and closed to the public can secure this aim, but this would need to be as part of a development scheme on the site.</p>
<p><i>12. protecting and supporting enhancements to playing pitches and sports courts at Central Park, Plashet School, Plashet Park and Lady Trowers Trust Playing Field and N13.SA3 Former East Ham Gasworks and supporting a PlayZone at Central Park;</i></p>	<p><b>Object:</b> To the protection of playing fields at the site as playing fields no longer exist, and therefore the policy is misleading.</p> <p><b>Support:</b> Desire to see enhancements of playing pitches at the Site subject to it forming part of an allocation which will secure enhancements.</p>
<p><i>15. improving air quality and reducing exposure to poor air quality, particularly in the Air Quality Focus Area and along the North Circular Road, Ron Leighton Way, High Street South and High Street North.</i></p>	<p><b>Comment:</b> Paragraph 186 of the NPPF states “Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. and so far as possible these opportunities should be considered at the plan-making stage. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications”.</p> <p>Policy identifies opportunity for air quality improvement, however, does not set out mitigation measures and leaves uncertainty as to how addressed at planning application stage.</p>

**c. N13.SA3 Former East Ham Gasworks**

The NPPF (Paragraph 69) requires the Council have a clear understanding of the land available for housing in the borough and to identify a sufficient supply and mix of sites, considering their availability, suitability, and likely economic viability. The Local Plan should identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for years 6 – 10 and, where possible, for years 11 – 15 of the plan.

Savills’ analysis of the principal strategic allocations within the current Local Plan (Appendix C) details that of the 29 Strategic Allocations within the 2018 Local Plan incorporating residential development, only 10 sites are either complete or currently under construction. It is also notable of these schemes currently under construction or complete only 2 received planning permission further to the adoption of the Local Plan in November 2018. Appendix C highlights the complexities of land assembly and planning alongside the timescales involved to deliver large residential allocations.

**Support Allocation** - This Site is located to the immediate north of Lady Trower Trust Playing Fields and as a former recreation ground currently inaccessible to the public shares many similar characteristics within a similar context.



In addition to the above, an additional site allocation should be added to the Local Plan as an independent allocation, namely Lady Trower Trust Playing Fields. Given the different land ownership of the two sites, they should not be under the same allocation, but it is evident that the two sites are closely related as they have similar land use designations.

By including further land to the south of N13.SA3 Former East Ham Gasworks, it will provide the opportunity for a larger more comprehensive redevelopment strategy in this part of the Borough, including improvements to MOL and the provision of a useable and attractive green link, whilst recognising the different private landownership of each site.

Relevant Text	Comment
<i>Development should take place on the part of the site outside the Metropolitan Open Land. Development should protect the openness of the adjacent Metropolitan Open Land and maintain the site's role in providing a continuous chain of open space along Newham's eastern boundary. Development should explore the restoration of the Back River.</i>	The 1.6 hectares of identified developable land consist of land that formerly consisted of tennis courts, sports pavilion, and a gas holder. As with Lady Trower Trust Playing Fields, which also historically comprised a tennis court, running track and sports pavilion, these uses have long since ceased and the land now comprises overgrown scrubland.  The inclusion of Lady Trower Trust Playing Fields as a allocation will further support the provision of a continuous chain of accessible open space within LBNs eastern boundary.
<i>Development should protect, enhance, and bring back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</i>	<b>Support:</b> A similar principle can be applied at Lady Trower Trust Playing Field, creating a chain of high-quality recreational land.
<i>Development proposals should ensure that flood risk is minimised and mitigated informed by a site-specific Flood Risk Assessment.</i>	This Site sits within flood zone 2 and 3. The policy provides an evidence led approach to flood risk management, which could be continued on Lady Trower Trust Playing Fields (located within Flood Zone 3).
<i>Mid-rise residential buildings below 21m (ca. 7 storeys) are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric. Massing should step down towards the east of the site to sensitively integrate with the existing two storey terraces on Leigh Road.</i>	<b>Support</b> suggested building heights, which can be continued onto Lady Trower Trust Playing fields without any loss of character.
<i>Development should establish a connected network of streets and spaces and that connects into the existing street network.</i>	The allocation of Lady Trower Playing fields provides a further opportunity for vehicular connections between Watson Avenue and Burges Road and pedestrian and cycle connections between Watson Avenue and Newham Way (A13).

## 5. Draft National Planning Policy Framework

- 5.1. On 30th July 2024, the incoming Labour Government published a consultation draft of the revised NPPF, this was also accompanied by an updated Standard Method formula and Written Ministerial Statement (WMS). The updated NPPF removes the use of the Standard Method as “an advisory starting point for establishing a housing requirement of an area.”
- 5.2. Secretary of State for Housing, Communities and Local Government Angela Rayner addressed Parliament to outline the reasons why change is necessary. Key amongst these is the need to increase the supply of new homes in England to meet the Government’s 1.5m homes target (the equivalent of 300,000 homes per year). This is in contrast to current expectations which show the rate of delivery across England will drop below 200,000 dwellings this year.
- 5.3. The updated NPPF also introduces the ‘Grey Belt’ defined as “land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes.”
- 5.4. Whilst MOL is a local designation to London, it is of equal status to the Green Belt and thus we would expect the Grey Belt to apply equally to MOL.
- 5.5. The accompanying (WMS) provides further guidance: “large areas of the Green Belt have little ecological value and are inaccessible to the public. Much of this area is better described as ‘grey belt’: land on the edge of existing settlements or roads, and with little aesthetic or environmental value.”
- 5.6. We would therefore consider the Land at Lady Trower Trust Playing Field to constitute Grey Belt Land.
- 5.7. The WMS proposes a strategic sequential led approach to the release of land, with authorities asked to give consideration first to brownfield land, before moving on to grey belt sites and then to higher performing Green Belt land. It is also clear that whenever Green Belt land is released, it must benefit both communities and nature, including providing accessible green space.
- 5.8. It is that the Green Belt should not be a barrier to development per se – so long as the land in question is in a sustainable location; provides suitable affordable housing and local infrastructure; is not subject to an existing environmental designation; and does not serve – or significantly undermine – a Green Belt function.
- 5.9. The amendments to the NPPF and WMS make clear the importance of Planning in effectively delivering the Governments growth agenda.

## 6. Summary

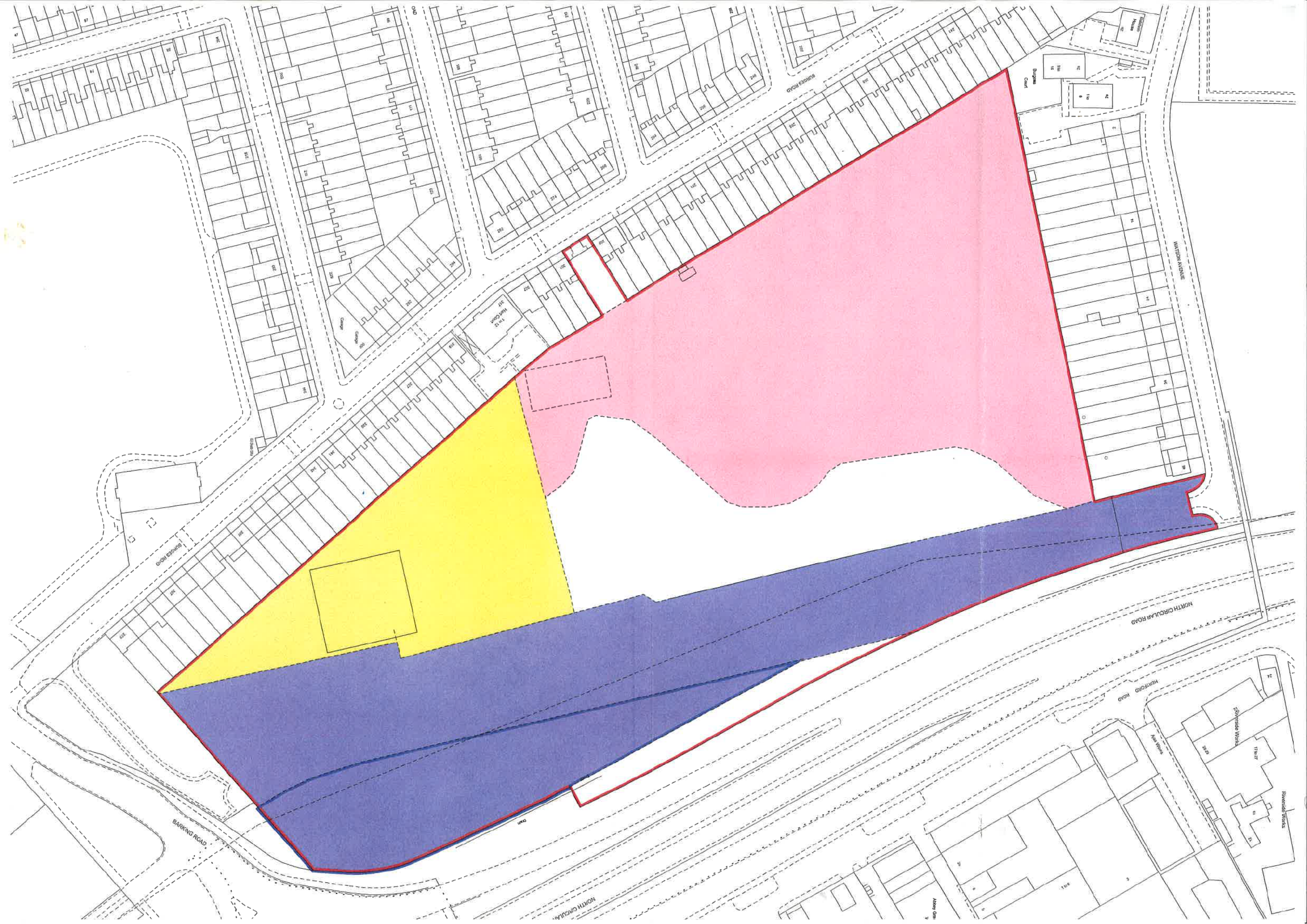
- 6.1. These representations have been formulated on behalf of Aston Mansfield in relation to the Lady Trower Trust Playing Fields, Burges Road. They are written in response to the consultation on the Newham Borough Council Regulation 19 Local Plan.
- 6.2. To summarise whilst many of the policy aims are supported Savills believe the proposed local plan requires work to ensure it meets the tests of soundness, in line with the NPPF.
- 6.3. Particular concern relates to the level of housing proposed, which appears to underestimate the level of housing required as per the London Plan 2021 and NPPF 2023.
- 6.4. Lady Trower Trust Playing Fields is currently allocated as MOL and SINC, however, due to the poor quality and 'wasteland' nature of the inaccessible site and given that appropriate mitigation measures can be implemented to prevent any adverse environmental impacts, the Site should be reallocated for housing to unlock its true potential and would provide significance benefits, both social and environmental. This includes acting as enabling development to unlock the ability of the land to provide high quality publicly accessible recreational facilities in perpetuity, which as a charity Aston Mansfield would be unable to otherwise provide.
- 6.5. The singular ownership and lack of delivery constraints alongside the willingness at Aston Mansfield to work with the LBN to improve the Lady Trower Trust Playing Fields presents a significant opportunity for delivery over the plan period in accordance with the aims of the NPPF.
- 6.6. This is a rare opportunity for LBN to unlock a site that can make a significant contribution to the existing community and deliver enhanced quality and accessible open space. Moreover, the Site would also deliver much needed affordable housing in an area that the LBN are focusing on regeneration and renewal given the Site's proximity to the centre of East Ham, as well as delivering new homes that would reduce the Borough's housing delivery deficit, and towards the London housing market as a whole.
- 6.7. Our client would be very keen to work with you to bring this Site forward, and to ensure that the Newham Local Plan meets the tests of soundness.

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## Appendix A Site Location Plan

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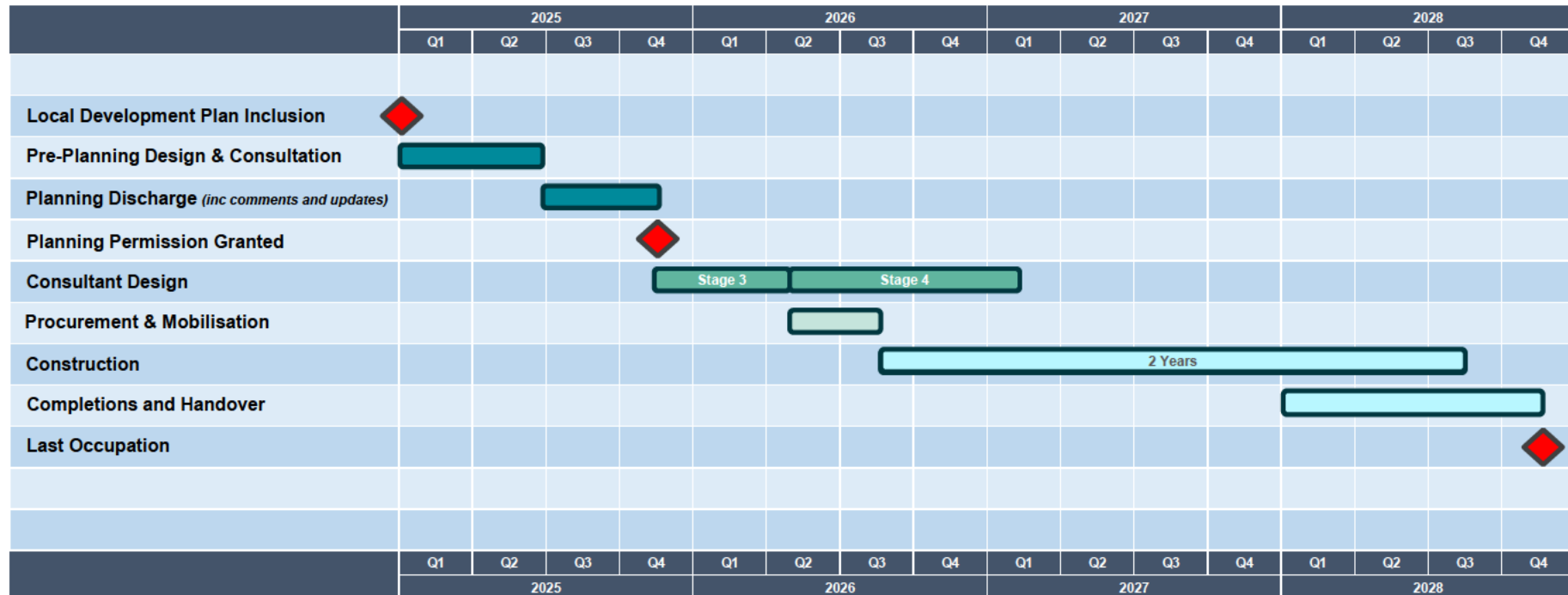
## Appendix B

### Site Milestones Programme

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# LADY TOWER TRUST PLAYING FIELDS, BURGESS RD, DRAFT SUMMARY PROGRAMME



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## Appendix C

### Newham Local Plan 2018: Existing Residential Site Allocations

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# NEWHAM LOCAL PLAN 2018: RESIDENTIAL STRATEGIC SITE ALLOCATIONS

Site Name / Address	Planning Status	Delivery Status	Allocation within Draft Regulation 19 Plan
S05 – Stratford Central	Stratford Yards Planning approval 23.09.19  423 BTR homes within 42 and 21 storey buildings, a ground plus 17 storey hotel block and a ground plus 10 storey office block along with retail floor space.	Not delivered	N8.SA1
S10 – Abbey Mills	No planning applications for residential development have been submitted.	Not delivered	N7.SA1
S29 – Plaistow North	Planning application for 319 residential units submitted December 2021, withdrawn March 2022.	Not delivered	N9.SA1
S21 – Silvertown Quays	Hybrid Planning application submitted December 2022.  Awaiting decision.	Not delivered	N2.SA1
S22 – Minoco Wharf	Planning permission was granted to redevelop the site with a mixed-use scheme, delivering 3,385 new homes, a new primary school, leisure facilities and retail and commercial office space	Complete	
S09 – Silvertown Landing	No planning applications for residential development have been submitted.  Site currently subject to Silvertown Tunnel works, due for completion 2025.	Not delivered	N2.SA4
S20 – Lyle Park West	No planning applications for residential development have been submitted.	Not delivered	N2.SA2

S23 – Connaught Riverside	Hybrid planning application submitted October 2021. Awaiting decision.	Not delivered	N2.SA3
S04 – North Woolwich Gateway	Full Planning application submitted November 2022, 350 units. Awaiting decision.	Not delivered	N1.SA1
S08 – Thames Wharf	No planning applications for residential development have been submitted.  Site currently subject to Silvertown Tunnel works, due for completion 2025.	No delivered	N2.SA4
S11 – Parcelforce	Hybrid Planning Application submitted May 2017, approved August 2018.  3,800 new homes.	Under Construction	N7.SA2
S13 – Manor Road	Hybrid Planning Application submitted December 2018, approved November, 2020, circa 800 dwellings.	Under Construction	
S14 – Canning Town Central	Outline Planning application submitted April 2011, approved March 2012  1148 dwellings.	Under Construction	
S15 – Canning Town East	No planning applications for residential development have been submitted.	Not delivered	N4.SA1
S16 – Silvertown Way East	No planning applications for residential development have been submitted.	Not delivered	N4.SA2
S17 – Silvertown Way West	Planning application for 975 dwellings, submitted November 2016, approved October 2017.	Complete	
S18 – Limmo	No planning applications for residential development have been submitted.	Not delivered	N4.SA4

28 – Custom House/Freemasons	Planning application submitted July 2022, approved January 2023 for 95 units on part of allocation site.	Not delivered	N5.SA1
S30 – Royal Victoria West	Application for 265 dwellings, submitted February 2018, withdrawn January 2019.	Not delivered	
S12 – Canning Town Riverside	Application for 871 dwellings submitted April 2023, approved September 2024.	Not delivered	N4.SA5
S06 – Coolfin North	No planning applications for residential development have been submitted.	Not delivered	N5.SA2
S19 – Albert Basin	Planning application submitted October 2012, approved December 2013.	Under Construction	
01 – Beckton Riverside	No planning applications for residential development have been submitted.	Not delivered	N17.SA1
S02 – Alpine Way	No planning applications for residential development have been submitted.	Not delivered	N11.SA3
S24 – Woodgrange Road West	Planning Application submitted March 2017, approved September 2017	Under Construction	N15.SA2
S25 – East Ham Market	Planning application submitted November 2017, approved October 2018, 277 dwellings.	Under Construction	
S26 – East Ham Town Hall Campus	Planning application submitted September 2016, approved September 2018. 185 dwellings.	Under Construction	
S03 – East Ham Western Gateway	Planning application submitted October 2020. Approved November 2021, 75 dwellings	Under Construction	N13.SA1

S27 – Queen’s Market	No planning applications for residential development have been submitted.	Not delivered	
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