

## James Scantlebury

---

**From:** John Sadler <[REDACTED]>  
**Sent:** 30 August 2024 16:55  
**To:** Local Plan  
**Subject:** CPRE London comments on Newham Local Plan consultation  
**Attachments:** CPRE London comments Newham Local Plan August 2024.pdf; Proposed tree ring route.png

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi there,

Please find attached CPRE London's response to the current Newham Local Plan consultation.

Many thanks and kind regards,

John

John Sadler  
[REDACTED]  
[REDACTED]  
[REDACTED]

[www.cprelondon.org.uk](http://www.cprelondon.org.uk)  
@CPRELondon

CPRE London provides support and advice to local campaigners for free - helping protect and enhance threatened local green spaces. Please consider becoming a member from just £5 a month to enable us to do this important work by [signing up here](#)

### Become a member - CPRE London

Becoming a CPRE member is the best way to support a beautiful, thriving countryside for all, and vibrant urban green spaces  
[www.cprelondon.org.uk](http://www.cprelondon.org.uk)



The countryside charity  
London

Working for a greener city



Planning Policy Team, London Borough of Newham  
328 Barking Road, East Ham, London E6 2RT  
By email to: [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)

30 August 2024

Dear Sirs,

### **Newham Local Plan – Regulation 19 Consultation**

CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Newham continues to have the least publicly accessible green space of any London borough and the Local Plan needs to be much more ambitious about dealing with this. The Council should prioritise the allocation of sites for affordable homes for Enfield residents on brownfield land. The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:

1. **Policy H1.1 All development should be on brownfield land.** This policy should state unequivocally that all protected green space and amenity green space will be retained as such, and that building on green spaces will not be supported in any circumstances. All proposals / site allocations which propose building on green space should be deleted. A number of Site Allocations incorporate proposals to build on green space: these should be deleted and/or revised to state that all amenity green space will be retained due to the acute shortage in the borough. More generally, the plan should be revised to remove/edit any Site Allocations so no existing green space is lost.
2. **Policy GWS1(1) and (2) should be revised to accommodate GAIN of green space (not simply *no net loss*) and to deliver adequate green space per person.** In particular, the policy "Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances", lists an extensive set of circumstances. **A stronger statement is needed to protect local green spaces** e.g. "To ensure there is adequate provision of green space in the borough, no development on amenity green space will be supported except in very specific circumstances. The circumstances should be significantly restricted and emphasis placed more clearly on increasing the quantum and quality per person."
3. Significant new green spaces should be created and existing parks designated as follows.
  - **A major new park in the east:** Metropolitan Open Land at Leigh Road Sports Ground N13.SA3 should not be allocated in any part for housing and instead the entire site should be allocated for sports / park / recreation. This should connect to the site to the south – the green site to the east of Burges Rd and it should all be included as a site allocation and given a clear identity as a major new park and nature reserve/habitat. This can become part of a new **River Roding Park Edgelands** and we urge Newham to work with River Roding Trust and the community to make this a reality for future generations.



- **A major new park in the west:** N7.SA1 (partially MOL) – site north of Crows Road – this is allocated for residential, open space and community floorspace but no detail is given on proportions. This is well connected to neighbouring sites which are still green and it (or a significant part of it) should be set aside for a large green open space / habitat – connected with neighbouring sites etc. Added to this, N7.SA2 (designated a SINC) – the gas holder site in the west of the borough should be safeguarded for conversion to green open space or tree planting (see below). And the waterworks site at Abbey Lane / The Greenway should be opened up and allocated for an accessible green / open space.
  - **West Ham Park should be designated as a Local Green Space in its entirety** as it is currently under threat from development and is one of the few open spaces in this highly built-up part of the borough. The LGS status should include the site of the derelict greenhouses which should be retained as part of the park. More generally, the Plan should designate all key public parks and open spaces as Local Green Space to ensure they are protected into the future.
4. **Housing estates, infill development and reconfiguring car-parking parking provision on estates** The Local Plan should include a policy for housing estate green spaces, stating that ‘infill’ schemes will ensure residents do not lose green space *per person*; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably enlarged; and that ‘grey space’ (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space.
5. **Housing ‘targets’:** **There is a significant risk of over-allocation of land for new housing – land which could be used for other purposes.** While we do not seek to challenge the figures for need, we must point out the implications of over-allocating land for housing which is very unlikely, in reality, to be built. Generally, the over-allocation of land means a great deal of land which could be allocated for other important purposes will lie idle for up to 20 years. Targets should be set at lower, realistic levels to ensure land is not wasted and potential for creating new sustainable transport hubs, large parks and green spaces is not lost.
6. **Main roads should be limited to one lane only**, for general traffic, to support delivery of the Mayor’s Transport Strategy targets and reduce the negative impact of roads in terms of severance and health. Remaining space should be re-allocated for bus or cycle lanes, wider pavements, or SUDS / trees etc, or in certain circumstances, even built development.
7. **A Kerbside Space policy should be introduced.** A huge amount of land is currently deployed as kerbside space – used mainly for parking private cars. Given the London Mayor’s Transport Strategy needs to underpin the Newham Local Plan, a policy should be included which recognised the importance of reallocating this space for sustainable uses which support both active travel and environment goals. Specifically, a policy should be included for reallocation of a minimum of 25% of Newham’s kerbside, referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council’s recent Kerbside Strategy); and supporting delivery hubs and shared mobility hubs (car share, bike share etc).



## 8. Specific site allocation comments

- N7.SA1 (partially MOL) – This is well connected to neighbouring sites which are still green and we're pleased to see part of it set aside for a large green open space / habitat – which could connect with neighbouring sites.
- N7.SA2 (designated a SINC) – gas holder site. There is a huge opportunity to safeguard this in its entirety or at a minimum safeguard a larger section for open space and/or habitat.
- N10.SA2 – Newham Sixth Form college site. This is allocated for "Residential development and open space" We do not believe this site should be allocated for housing. The green/open space should be retained for its amenity value.
- N10.SA3 – Newham Leisure Centre site. This allocation is still unclear about how much space will be retained as green space and more generally it is a proposal to build residential on green space which we strongly object to. This should not be allocated for residential development – if the leisure centre is to be reprovisioned, no green or open space should be lost and car parking should all be returned to green space, with only disabled parking retained, to support sustainable transport targets.
- N11.SA2 - vacant land and greenspace at Ferndale Street, E6 6FS. It is difficult to see how 'no loss of green space' can be achieved with this site, if it is to be used for residential development. More generally, given the lack of green space in the borough, it should be retained for public green space.

## 9. Designating space for woodland creation

Attached to this submission is a separate image file outlining our proposed M25 of trees route. The line in yellow shows route for creating connectivity in tree cover around the capital, across borough boundaries. We very much hope that as part of its land-use planning, Newham Council could support and encourage a range of treescape along this line ranging from planting and allowing natural regeneration of native woodland, to orchard areas, to areas of intensified street tree planting and the creation of garden streets in response to the urgent need for action on climate change and biodiversity strengthening. We are happy to talk to the Council about the map and how it has been created. It is important to stress the route is provisional and we are in the process of further landowner and community engagement to provide a further layer of verification of the suitability of these sites. A higher resolution zoomable version of the map, and underlying information, is available direct from Greenspace Information for Greater London (GiGL). Members of the Tree Ring Steering group include The Conservation Volunteers, Woodland Trust, Trees for City and Forestry England. The plan also has the unanimous support of the More Natural Capital Coalition - a coalition of 19 environmental charities working across the capital.

local people have come forward to us to recommend the following sites in Newham which could be considered for tree planting and woodland creation to contribute to a London Tree Ring Community Forest:

### East Ham Nature Reserve

- **Ownership:** Managed by Newham Council, Parks Department

### Leigh Road Sports Grounds

- **Area** – approx. 9 ha
- **Ownership:** London Borough of Newham, a charity (possibly)



**Miers Close Wildlife Area**

- **Area:** 0.19 hectares
- **Ownership:** London Borough of Newham

**Barking Road Recreation Ground**

- **Area** – approx. 0.174 ha
- **Ownership:** LBN (London Borough of Newham)

**Jenkins Lane Civic Amenity Site**

- **Area** – approximately 0.03 ha
- **Ownership:** London Borough of Newham

**Beckton Sewage Treatment Works**

- **Ownership:** Thames Water

**Bromley-by-Bow Gas Works**

- **Area** – approx. 1 ha
- **Ownership:** Birch sites limited (private)

**Three Mills Park**

- **Area:** approx. 0.3 ha
- **Ownership:** Lee Valley regional park authority

**Land north west of West Ham Station**

- **Ownership:** Unknown.

**Little Ilford Park**

- **Ownership:** London Borough of Newham

Thank you for the opportunity to comment on this important consultation.

Yours sincerely,

John Sadler  
Campaigns Officer  
CPRE London



# Woodland Creation Opportunities in Greater London's Green Belt

Produced by Greenspace Information for Greater London CIC, Oct 2023



GiGL

Greenspace Information for Greater London CIC  
the capital's environmental records centre

