

Newham Local Plan Refresh Issues & Options Consultation Report

**WE ARE
SHAPING.**



**WE ARE
NEWHAM.**

A NEW LOCAL PLAN.
GET INVOLVED IN SHAPING THE FUTURE OF NEWHAM TOGETHER.

18 October – 17 December 2021

The Local Plan is the key planning document which we use to assess planning applications and to manage where regeneration and development happens in Newham.

#NewhamLocalPlan

People at the Heart
of Everything We Do

October-December 2021

WE ARE NEWHAM.

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1. Executive Summary

Introduction to the Consultation Report

- 1.1 This report sets out the engagement process undertaken for the Issues & Options consultation, which was carried out by the LBN Planning Policy team as part of the Newham Local Plan Refresh. The Issues and Options consultation took place between 18 October and 17 December 2021. A total of 386 representations were received, providing 5207 comments.
- 1.2 There are two main aims for this report. Firstly, it provides an update and transparent breakdown of all of the engagement activities delivered during the Issues & Options consultation. Secondly, the report summarises the consultation responses received and sets out how the responses have influenced the formulation of the new Draft Local Plan.
- 1.3 In this report, you will find an introduction to the Local Plan Refresh and the Issues & Options consultation, a breakdown of the methods used, a summary of the responses received, and a summary how these comments have been taken into account.

2. Introduction

Introduction to the Local Plan Refresh

- 2.1 The Local Plan is the key planning document which the Council uses to assess planning applications and to manage where regeneration and development happen in Newham.
- 2.2 The existing Local Plan was adopted in 2018 and it is currently being updated, as all Councils are required to have an up-to-date Local Plan. An updated Plan will allow the Council to plan for the next 15 years up to 2038 and respond to our key challenges of delivering inclusive growth, supporting the Covid-19 recovery, and responding to our climate emergency.
- 2.3 The plan-making process commenced with the production of the Issues & Options document and its respective consultation, which is introduced below.

Introduction to the Issues & Options Consultation

- 2.4 During the period between 18th October-17th December 2021, we carried out a series of activities to consult on the Issues & Options document. In this same period, the Call for Sites exercise was undertaken, together with a consultation on the draft Statement of Community Involvement and the Integrated Impact Assessment Scoping Report. The overall consultation period lasted for eight weeks, which exceeded the statutory requirement of a six-week consultation.
- 2.5 The Issues & Options document listed the priorities and current challenges for each of the planning themes, including Vision, Neighbourhoods, Design, High Streets, Community Facilities, Economy, Homes, Greenspaces and Waterspaces, Climate, Transport, Waste and Utilities, and the structure of the Plan itself. For each of the themes, the current issues were identified and the potential options to address such issues were suggested. This document can be found on the [Council's website](#) and [Newham Co-Create](#).
- 2.6 We carried out a large-scale consultation on this document with the objective of capturing as many opinions as possible. We also focused on engaging Newham's diverse range of communities and stakeholders in order to address the gaps and challenges from previous Local Plan consultations. This consultation allowed more flexibility in terms of the methods used to engage with residents compared to the later stages of the plan-making process, which facilitated obtaining comments from wider demographics.

- 2.7 In addition, this consultation sought to provide residents with a set of tools for which to understand the complexities of the planning system. This was an essential aspect of the engagement process, as one of the aims in the Local Plan Refresh [Engagement Strategy](#) was to provide useful skills in order to make the consultation more accessible and effective as a building block for future engagement.
- 2.8 The range of stakeholders consulted included residents, statutory consultees, infrastructure providers, developers, community groups, neighbouring Local Authorities, landowners, business owners, elected officials, and Council staff. The variety of stakeholders, together with the array of engagement activities tailored to each of the stakeholders, addressed equality considerations in line with the Equality Act 2010.
- 2.9 Albeit not a formal consultation stage of the Local Plan Refresh, the Issues & Options Consultation followed the requirements for Regulation 18¹. It also adhered to the requirements of the current Statement of Community Involvement as well as the Local Plan Refresh Engagement Strategy that was produced to guide our objectives, vision, and principles for engagement.

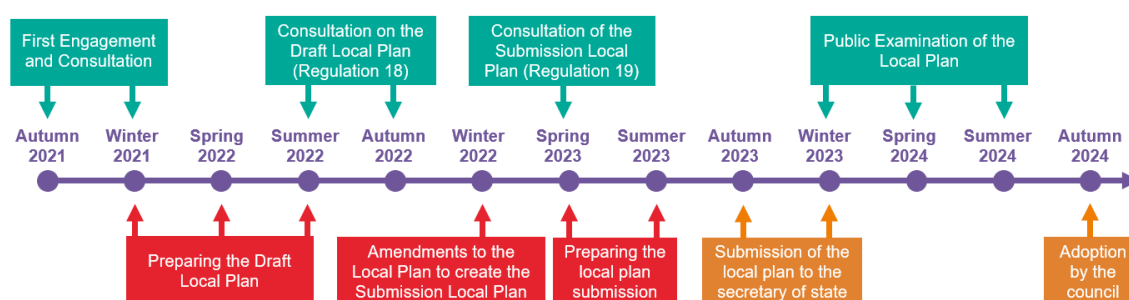


Figure 2.1 – Plan-Making Stages

- 2.10 The findings from this consultation, together with various evidence base research and two more rounds of consultations, will inform new and refreshed policies for the Draft Local Plan to be adopted in 2024 (see figure 2.1).

¹ Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 requires that various bodies and stakeholders be notified that the Council is preparing a plan. It invites them to comment about what that plan ought to address.

3. Consultation & Engagement Activities

Overview

- 3.1 A variety of customary and innovative engagement methods were used to ensure that the consultation process reached and engaged as many people as possible, accounting for the diverse geography and demographics of Newham.
- 3.2 The combination of methods was curated to reflect the vision and principles set out in the Engagement Strategy. In summary, the vision's objectives were to centre the lived experiences of residents, provide planning skills to residents, give equal importance to each of the methods used, and overall inform the Local Plan Refresh according to the needs and aspirations of residents. The principles that guided such vision were to approach engagement activities with humility and empathy, ensure accessibility and inclusivity via a range of methods, attempt to make activities fun and easy, empower young members of the community, communicate effectively, and ensure that the engagement was overall meaningful.
- 3.3 The vision and principles laid out in the Engagement Strategy were informed by the overarching vision and objectives of the Local Plan Refresh, which were shaped by the [Pillars](#) set out by the Mayor of Newham to build a fairer Newham. These included tackling racism, disproportionality, and inequality, promoting community wealth building, and putting people at the heart of everything we do.
- 3.4 In addition, the engagement activities were also developed in accordance with plan-making legislation, national planning policy, and the principles set out in the current and emerging draft of the Statement of Community Involvement.
- 3.5 The engagement activities were divided into three chronological categories (see Figure 3.1), each of them with a different objective.

Firstly, engagement was **broadcasted** through social media, the Newham Recorder, public advertisement boards, email distribution lists, the Council's website, leaflet drops, and a promo video.

After broadcasting the Issues & Options consultation, the engagement process transitioned into **listening** to ideas and opinions, which was achieved through a combination of online and hard copy questionnaires, in-person travelling stalls, email correspondence, equalities events, and Newham Co-Create.

The final element of the engagement phase sought to take listening to the next level through **co-producing**. This was enacted through a series of focused workshops divided according to planning themes, such as housing and Town Centres. At a later stage of the plan-making process, ethnographic engagement will be carried out to address any gaps in responses from certain demographic groups.

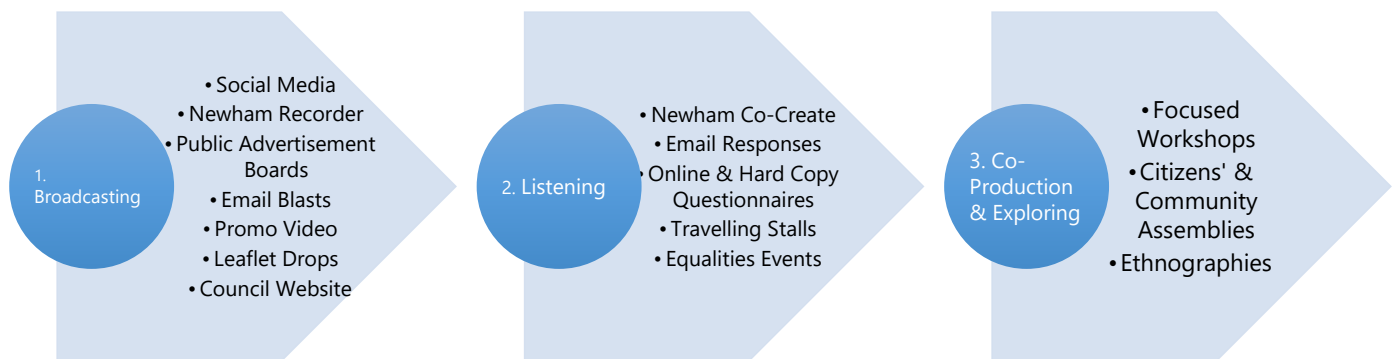


Figure 3.1 – Engagement activities process

Equalities & Accessibility

3.6 The methods set out below were tailored to address any equalities considerations, in line with the Equality Act 2010. Several considerations, such as adopting a consistent approach to engagement and finding alternatives for potentially digitally-excluded stakeholders have been thought out to ensure that engagement and consultation is carried out in an equitable and accessible way where everyone has the opportunity to participate.

3.7 We are also evolving our approach, reflecting our increasing understanding of the needs of our communities and by addressing any limitations of this consultation in order to ensure that engagement remains accessible and is amplified in the next consultation phase.

Duty to Cooperate

3.8 At the start of the consultation period, a specific email was sent to Duty to Cooperate bodies to notify them of the consultation and to welcome them to raise any specific Duty to Cooperate issues in their consultation responses. Specific meetings were held with the Lea River Regional Park on the 9th December 2021 and London Borough of Redbridge on the 11th May 2022. A number of specific points were made by stakeholders, relevant bodies, and neighbouring authorities relating to Duty to Cooperate and joint working matters. These are summarised in Chapter 5.

3.9 We have also been engaged in regular Duty to Cooperate conversations in order to inform various evidence base documents. This practice will continue to be carried out throughout the plan-making process.

How We Engaged

Broadcasting

3.10.1 Frontline Staff Training

In order to truly reach residents who may not typically engage with the planning system, we worked with LBN frontline staff – including officers in libraries, children’s centres, community neighbourhoods, and housing – to help reach out a wider audience. These officers interact with residents on a daily basis and therefore could help spread the word about the Local Plan Refresh to residents and community groups.

A frontline staff training session was held in early October 2021 ahead of the consultation period. The session provided an introduction to the Local Plan process and an explanation about the importance of residents’ participation in the Local Plan Refresh. We then explained how they could aid in spreading the word, such as giving out leaflets, speaking to residents and encouraging them to attend our workshops, or even helping fill out the questionnaire.

This method was very successful to get closer to residents and to spread knowledge of the Local Plan to Council staff more widely, which was continued throughout the entire consultation period via its promotion in the Council’s weekly staff bulletin and the staff intranet.

3.10.2 Social Media

Facebook, Twitter, Instagram, LinkedIn, and TikTok were all used to broadcast the consultation, as well as invite people to attend our stalls, workshops, and access Co-Create. Some of the posts included important facts and figures regarding each of the planning themes to help give stakeholders further information and context to what we were engaging on (see figure 3.2).

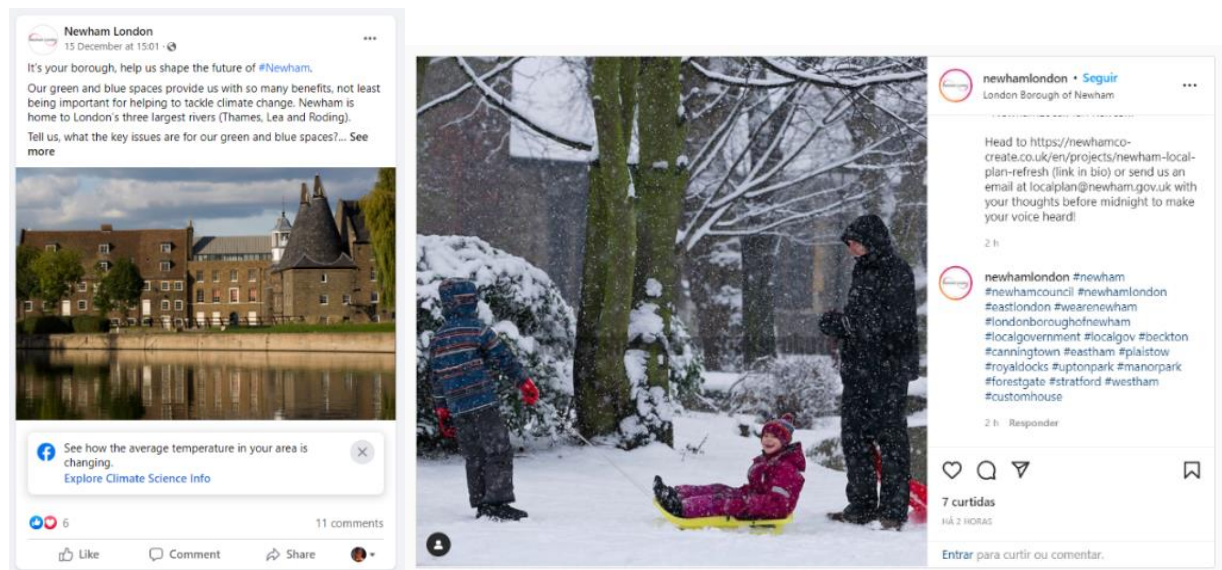


Figure 3.2 – Examples of Social media posts

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

There were around 30 Facebook posts posted, 33 Twitter Posts, 16 Instagram Posts, 3 TikTok posts, and 5 LinkedIn posts during the consultation period.

This method was highly useful in promoting information and reminding stakeholders to submit responses.

3.10.3 Emails

Email distribution lists were used to notify a wide range of stakeholders about the consultation, as well as provide information about the various ways for submitting responses and the dates for stalls and workshops (see figure 3.4).

In addition, officers within the LBN Planning Department included a message about the consultation in their email signatures, in order to reach residents already engaged with the planning system, as well as developers, and landowners.

There were two rounds of emails, one at the beginning of the engagement period on the 18th October and a reminder on the 6th December, two weeks prior to the end of the engagement period.

The emails sent to the Planning Policy database reached 1037 subscribers, yet the amount of people reached via email distribution lists was much higher as teams across the Council and local organisations re-sent our emails to their subscribers on behalf of the Planning Policy team. The table below (see figure 3.3) shows the list of organisations and stakeholders that helped send out the email to their lists, including the Royal Docks and the LLDC.

Council-led Residents' Groups	Community Organisations	Arts Organisations	Stakeholder Database	Other
Interfaith Forum	Newham Somali Organisation	Rosetta Arts	Statutory Consultees and Duty to Cooperate stakeholders	LBN Staff
Newham United Dialogue	Shpresa Programme (Albanian Association)	Applecourt Arts	Residents	Newham Chamber of Commerce members
Community Assembly Steering Groups	Newham Chinese Association		Businesses	London Legacy Development Corporations Stakeholder Database
Citizens' Assembly Steering Groups	All local voluntary organisations that are part of the Compost umbrella organisation		Landowners and developers	Royal Docks Stakeholder Database
Ageing Well Residents' Group	Newham Chamber of Commerce		Community groups' representatives	
Young residents involved in Youth Zones' activities				
Older People's Reference Group				
Covid Health Champions Residents' Group				
Community Neighbourhood teams				

Figure 3.3 – Local groups/forums engaged with

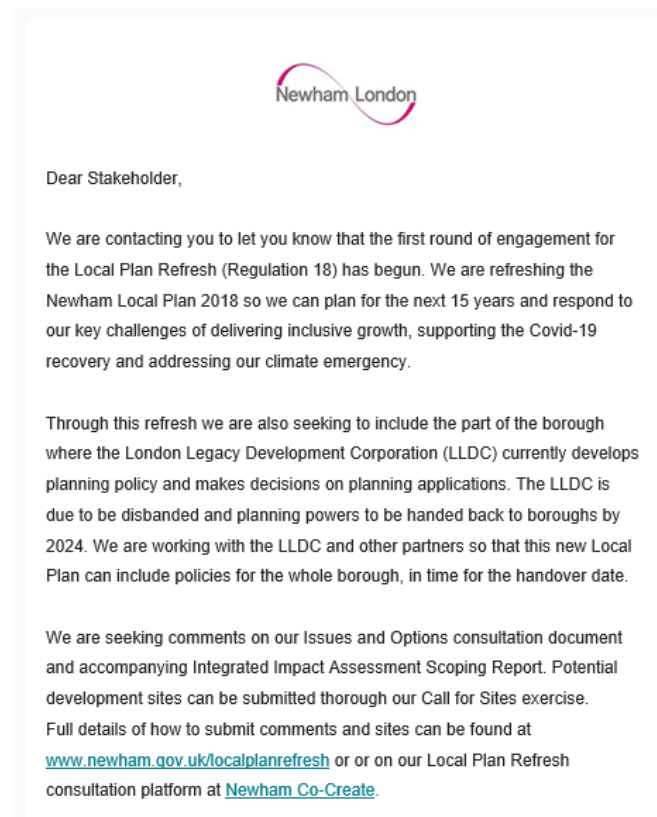


Figure 3.4 – Stakeholder email

3.10.4 Council Website

The Issues and Options document, Integrated Impact Assessment Scoping Report and Call for Sites response form were published on the [Council's website](#) at the start of the engagement period (see figure 3.5).

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

Information about the Issues and Options engagement was also published on the Council's current consultations webpages to reach residents who use the website on a frequent basis.

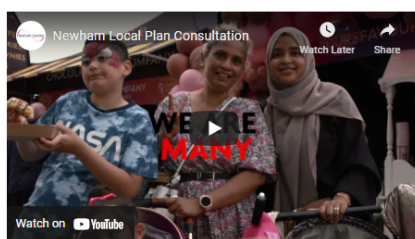
The website is extremely useful in that it will progressively build up into a timeline of all the stages of the Local Plan Refresh, serving as an archive that will continue to be updated throughout the review.

Newham Local Plan Refresh

Contents

1. Local Plan Refresh - Issues and Options
2. Newham Characterisation Study
3. Call for Sites
4. Retail and Leisure Study Household Survey
5. Integrated Impact Assessment

Local Plan Refresh - Issues and Options



What is the Newham Local Plan Refresh?

The Local Plan is a key planning document which is used to assess planning applications and to decide where regeneration and development happen in Newham.

The Local Plan includes policies on where homes, shops, parks, schools, health centres, workspaces spaces, and community spaces should be located. The policies determine how new buildings should look like and what should they be used for, as well as how to make sure there is affordable housing for everyone.

All Councils are required to have an up-to-date Local Plan. We are refreshing ours so we can plan for the next 15 years and respond to our key challenges of delivering inclusive growth, supporting the Covid-19 recovery, and addressing our climate emergency.

Figure 3.5 – Council webpage

3.10.5 Public Advertisement Boards

This method consisted of visual displays in public spaces, contributing to spread the word about the Local Plan Refresh. Twenty-two boards were displayed for over the last two weeks of October throughout the entire borough (see figure 3.6 and 3.7).

Their graphics were designed in line with the Council's branding guidelines and included a QR code that directed people to Co-Create.

The aim of this method was to raise awareness from pedestrians and residents who transit the borough.



Figures 3.6 & 3.7 – Public advertisement boards

3.10.6 Newham Recorder

A press release in the Newham Recorder was used to strike a balance between digital and print mediums (see figure 3.8). This method aimed to reach digitally-excluded residents or those without social media accounts.

A public notice was also published in the Newham Recorder at the start of the engagement period (see Appendix 1).

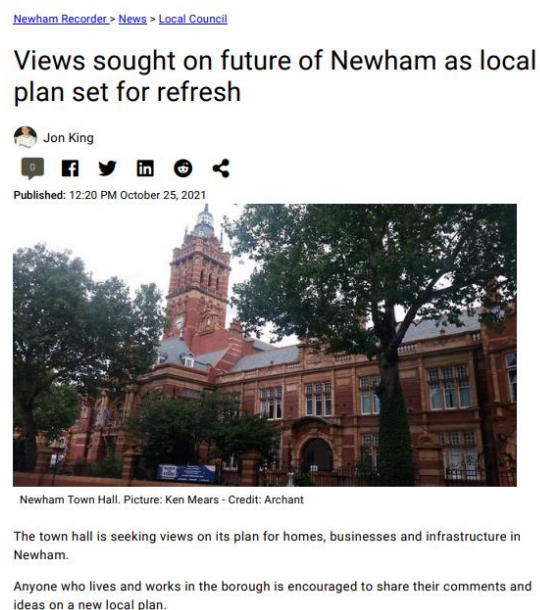


Figure 3.8 – Newham Recorder article

3.10.7 Promo Video

In order to captivate residents, especially younger residents, we created a short [promo video](#) explaining the Local Plan Refresh process and how people could engage with it (see figure 3.9). Big Tree Collective was selected to create a dynamic and engaging video that reached over five hundred people via YouTube.

The video was divided into three parts; an introduction to the borough, an explanation of what the Local Plan is, and a guide on how to get involved in the consultation. In its entirety, it was intended to serve as a longer explanatory visual aid of the plan-making process. The three sections were also published separately on social media. This method proved to be incredibly versatile and, in addition to social media, was published in the Council's website, Co-Create, and YouTube.

Planning officers worked with youth workers from Stratford Youth Zone to identify local young residents who were interested in narrating the video. Two young residents agreed to attend a voice recording session, where they had the chance to learn about the Local Plan and improve their skills in narration, editing, and communication skills. As such, the video achieved to bring in an element of co-production within the overall engagement process.

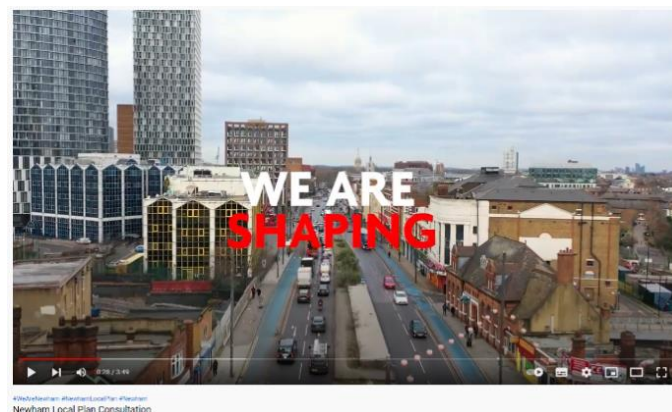


Figure 3.9 – Promo video capture

3.10.8 Leaflet Drops

The final method used to broadcast the consultation was leaflet drops (see figure 3.10 & Appendix 2). Leaflets were dropped in ten libraries, five leisure centres, ten children's centres, five youth zones, five community centres, and were also available at all stalls (see figure 3.11).

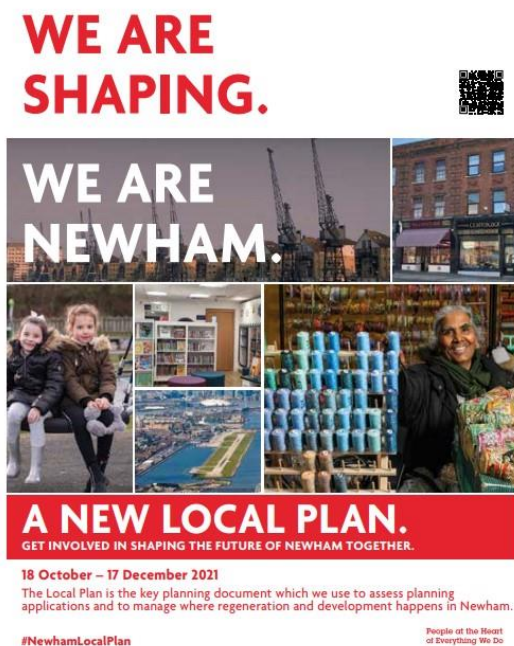


Figure 3.10 – Leaflet cover

This method allowed residents to take the leaflet home, read about the Local Plan process, and find out how they could get involved, including dates for workshops and stalls, a QR-code leading to Co-Create and our email address.

Name	Type of Facility
Atherton Leisure Centre	Leisure Centre
East Ham Leisure Centre	
Manor Park Fitness Centre	
Newham Leisure Centre	
Beckton Globe Library	
Canning Town Library	Library
Custom House Library	
East Ham Library	
The Gate Library	
Green Street Library	
Manor Park Library	
North Woolwich Library	
Plaistow Library	
Stratford Library	
Forest Lane Lodge Community Centre (Forest Gate Community Neighbourhood)	Community Centre
Trinity Community Centre (Canning Town & Custom House Community Neighbourhood)	

Woodman Community Centre (Beckton & Royal Docks Community Neighbourhood)	
Stratford Youth Zone	Youth Zone
Shipman Youth Zone	
Beckton Globe Youth Zone	
Forest Gate Youth Zone	
Little Ilford Youth Zone	
Beckton & Royal Docks Children's Centre	Children's Centre
Edith Kerrison Children's Centre	
Keir Hardie Children's Centre	
Altmore Children's Centre	
Oliver Thomas Children's Centre	
Kay Rowe Children's Centre	
Maryland Children's Centre	
St Stephen's Children's Centre	
Sheringham Children's Centre	
Rebecca Cheetham Children's Centre	

Figure 3.11 – Leaflet drop locations

3.10.9 Hard Copies

In order to ensure that methods were equally accessible to digitally-excluded residents, hard copies of the Issues & Options document were available showcased in all public libraries and Dockside for residents to read.

Additionally, we posted the document to residents that requested to read the document but were shielding and could not go to libraries. The details of how to request a document were available on the website.

Listening

3.11.1 Newham Co-Create

The Co-Create online platform provided an online space where people were able to submit consultation responses in different ways.

Within the Local Plan Refresh page, residents were able to find an explanation of the plan-making process, a link to our online questionnaire, a link to sign up for workshops, a list of our stall dates, and an email address to send responses to in the form of writing, video, or photograph.

Users were also able to map their comments geographically via the platform's map function (see figure 3.12).

The platform achieved to provide a user-friendly method that was specifically devised for digital resident engagement, serving as one of the pilot consultations to test the platform as a whole.

Links were also provided to where stakeholders could submit a site via the Call for Sites process or comment on the Integrated Impact Assessment Scoping Report and draft Statement of Community Involvement.

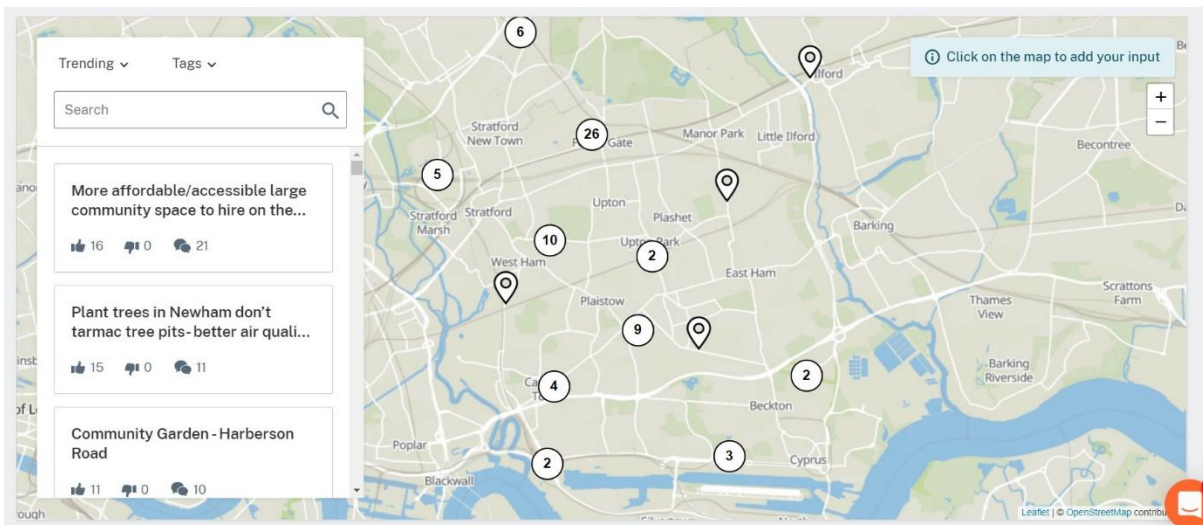


Figure 3.12 – Co-Create map

3.11.2 Questionnaire

A questionnaire was available for stakeholders to be able to directly comment on the Issues & Options document (see figure 3.13). The response form could be found online or as a hard copy in 10 local libraries across the borough. All hard copies were collected from libraries at the end of the consultation period.

In light of Covid-19 restrictions, we also posted the response form and Issues & Options document to shielding residents.

2 → Our Vision For Newham

c. What do you think makes Newham special?

Type your answer here...

Shift ⌘ + Enter ↵ to make a line break

OK ✓

^ v Powered by Typeform

Figure 3.13 – Questionnaire question

3.11.3 Travelling Stalls

Our travelling stalls were one of the most successful engagement activities, with an event in every Community Neighbourhood (see figure 3.14). This method provided the opportunity for residents to hold informal conversations with planning officers in public spaces and submit comments in person. We achieved to 'go to' residents, as opposed to them having to come to us (see figure 3.15).



DATE	TIME	LOCATION
Tuesday 19 October	5-7pm	Newham Leisure Centre
Thursday 21 October	3-5pm	Stratford Library
Monday, 25 October	12noon-2pm	Asda Beckton Superstore
Tuesday 26 October	12noon-2pm	Royal Victoria Dock Tesco Express
Thursday 28 October	3-5pm	Manor Park Library
		Stratford Youth Zone
Saturday, 30 October	2-4pm	Black History Month's Afro Art Festival in Central Park
Sunday, 31 October	2-4pm	Family Weekender in Bow Arts, Royal Albert Wharf
Thursday 4 November	11am-1pm	Canning Town Library/Rathbone Market
Saturday 6 November	1-3pm	Queen's Market

Figure 3.14 – Stalls' Locations & Figure 3.15 – Stalls' Schedule

The stalls were also attended by Development Management Officers, Regeneration Officers, and Community Neighbourhood managers to provide further assistance to residents and to offer residents the opportunity to chat with a variety of Council staff (see figures 3.16, 3.17 & 3.18).

Officers attending the travelling stall asked a series of questions to residents that served as a prompt to start a conversation, including, “What makes Newham a special place?” and, “What are your hopes and fears for the future of Newham?” These questions emerged from the Vision chapter within the Issues & Options document. Residents could also read hard copies of the Issues and Options document or take a leaflet to find out about the other ways they could take part in the engagement.



Figures 3.16, 3.17 & 3.18 – Stalls

3.11.4 Email Correspondence

To ensure that stakeholders had as many possible ways to submit responses as possible, comments could be submitted to the Local Plan inbox, which could be in the form of writing, photographs, or videos.

The email address was widely shared on Co-Create, the Council’s website, the leaflets, and the notification email.

3.11.5 Additional Events

In a similar ethos to the travelling stalls, the team sought to go to residents’ rather than them come to us. This was achieved by attending 12 events, including online workshops, conferences, and community meetings, to ensure we obtained responses from all demographics and to facilitate engagement for residents (see figure 3.19).

This method also proved successful in connecting with local organisations and was welcomed by many residents and organisations who invited us to attend their events.

23/10/2021	Brighter Futures Weekend Sport Event for children with SEND at Newham Leisure Centre
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28/10/2021	Youth Stall at Stratford Youth Zone
02/11/2021	Beckton and Royal Docks Neighbourhood Forum – Online Meeting
02/11/2021	Covid Health Champions Outreach Group – Online Meeting
06/11/2021	Shpresa Programme Meeting at Stratford Library
13/11/2021	Youngest in Charge Project Launch Event at Old Town Hall, Stratford
15/11/2021	Diverse Communities Health and Wellbeing Forum – Online Meeting
22/11/2021	Newham Chamber of Commerce – Online Meeting
23/11/2021	Ageing Well Strategy Resident Engagement Event at Old Town Hall, Stratford
25/11/2021	Royal Docks Speaking Together: Communications Workshop (with community group representatives from the Royal Docks) at Britannia Village Hall
13/12/2021	One Newham Workshop – Online

Figure 3.19 – Attended events

Co-Producing

3.12.1 Workshops

Two types of online workshops were carried out. One of the types were workshops which were open to anyone who registered, held on the 20th of November from 11:00-13:00 and on the 29th November from 18:00-20:00. They were deliberately held during the evenings and weekends to accommodate to people with limited availability during the working week. During these workshops, the Mayor of Newham and Chief Planning Officer were invited to give a key introduction speech to the workshop and provide the opportunity to answer questions directly to residents.

The workshops provided an introductory section explaining the planning system and the role of plan-making within it, in order to enhance a better understanding of the planning system, including different perspectives and its trade-offs. Subsequently, attendees discussed the proposals made in the Issues & Options document for the each of the themes. The second half of the workshops included a group exercise that involved changing, adding, or keeping proposals. Attendees could choose which planning themes they were most interested in and enter theme-based breakout rooms led by members of the Planning Policy team. This exercise promoted the influence of participants in informing policy via their lived experiences and also offered a space for new and identified need to be raised.

The second type of workshops were eight themed workshops from mid-November until mid-December, covering the Economy, Transport, Home, Community Facilities, Greenspaces and Waterspaces, Design, and High Streets (see figure 3.20).

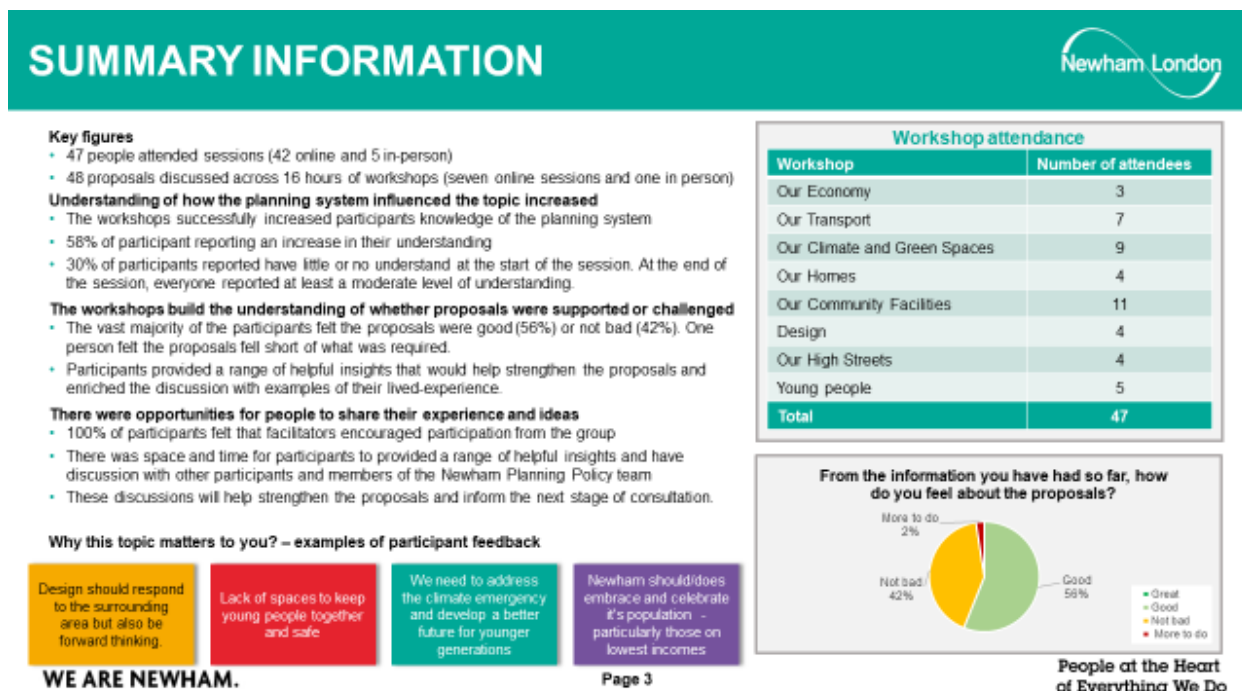


Figure 3.20 – Workshops’ Breakdown

A workshop for young people was also organised at Stratford Youth Zone on the 14th December from 16:00-19:00, with the support from members of the Brighter Futures team (see Figure 3.21).



Figure 3.20 – Youth Workshop Breakdown

The themed and youth workshops were coordinated by Tom Spencer, an experienced workshop facilitator. Different to the open workshops, these workshops provided the opportunity to talk about each theme in detail amongst stakeholders that already have a relationship to the planning theme. Tools such as Jamboards, polling function, Zoom chat, and questionnaires were used to make the virtual workshop as engaging as possible to attendees (see figures 3.21 & 3.22).



Figure 3.21 & 3.22 – Workshop capture & Jamboard

The invitee lists (see Appendix 3) aimed to encompass all perspectives regarding each theme, ranging from representatives of relevant organisations and companies, residents involved in community groups, academic experts, and relevant LBN staff. The workshops also provided a space for stakeholders with shared interests to network. Forty-seven people attended in total, out of which 58% reported an increase in understanding after the workshops, and feedback was positive, with 100% of respondents saying that they were somewhat or fully satisfied with the workshop.

The youth workshop involved the use of historical maps of Newham as well as current photos of public spaces with the objective of highlighting how planning has changed the borough over time and providing a geographic visual aid for young people to suggest changes and improvements (see Figures 3.23 & 3.24).

YOUTH WORKSHOP – MAP ACTIVITY

Theme	Comments
Community Facilities	Important to have access to lots of facilities (e.g. forest gate)
Homes	Higher rise buildings are not practical for all
Transport	- Bike lanes and better parking near your flat - Traffic (A131)
Open spaces	- More parks, more lakes. Make it greener - build more parks, safe environment - Wanstead Flats – link between three boroughs - More green Spaces - If you create green space what do you lose?
Safety	- Better CCTV and safety - Improve lighting
Approach	- Look at what is already here before creating something new - Save what you have and maintain it
Economy	Supporting small businesses should continue



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People at the Heart of Everything We Do

YOUTH WORKSHOP – THEMATIC DISCUSSIONS

Theme	Comments
Community Facilities	- Look at which facilities are used most and distribute the one's used most across the borough - Improve transport to improve access to facilities – don't need to move the facilities or create more - Embedding social value in spaces – this also need needs to be for businesses – space needs to be affordable - Install wildlife reserves in large parks
Homes	- Stop building box rooms! Need space for families - Post pandemic our homes are needed for so much more - Arrange groups to crack down on crime - Area around Stratford – houses aren't affordable locally. They are for people outside Newham - Build shelters for homeless residents - Reduce anti-homeless architecture – you should be able to sleep on benches - Reduce high rents
Transport	- Safer and more accessible bike lanes - Improve bus and train network – it is easier to go by car - Green Street and Forest Gate – hard to find where to park bike, safety of bike parking
Climate	Retrofitting is important
Open spaces	- Thames barrier park – welcoming and peaceful but would be good to do something with the café - Park life – more activities in parks (these were stopped due to Covid) - Managing biodiversity in green spaces



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People at the Heart of Everything We Do

Figure 3.23 & 3.24 – Youth Workshop Map and Photo Exercise

3.12.2 Citizens' Assembly

The Planning Policy team attended one of the Council's Citizens' Assembly, which had the theme of 'Greening the borough' as voted by residents. During that session, the Local Plan Refresh was

broadcasted to the attendees, and the outcomes of the session were also considered for policies on greenspaces and climate. Such outcomes were entirely co-produced by residents and their priorities.

3.12.2 Ethnographies

As part of the Issues & Options Consultation Strategy, it was determined that any demographic gaps identified should be addressed through an ethnographic evidence base, centring the voices of residents that may have been missed. As such, the gaps listed in the next section may inform future ethnographic work.

4. Who responded

4.1 This chapter depicts a breakdown of the respondents in order to gain an understanding of which stakeholders were successfully engaged during the Issues & Options Consultation, and which sections require more of an emphasis during the next round of consultation.

4.2 A total of 386 representations were received for the Issues & Options Consultation. From those 386 representations, 5207 comments were obtained.

4.3 A representation stands for each submission received, which is then broken down into several comments. A representer is the stakeholder who submitted a representation.

Representors

Figure 4.1 shows the breakdown of representations according to representors. It can be observed that residents were the most popular representer group providing 74% of representations, followed by Other² (6%), and Statutory Consultees (6%).

Representer Breakdown

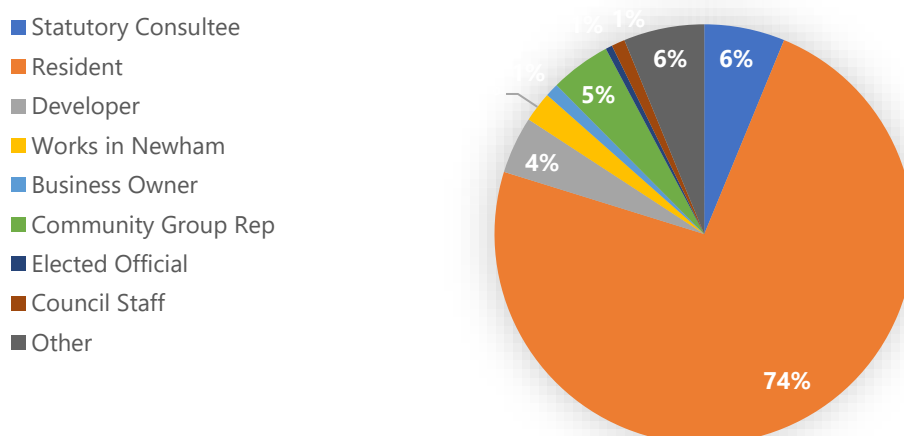


Figure 4.1 – Representer Breakdown

² The category 'Other' includes representors that did not provide any information when submitting a response.

24 statutory consultees provided representations, as well as 284 residents, 17 developers, 18 Community Group Representatives, 9 people who work in Newham, 4 Newham business owners, 2 elected officials³, 4 Council teams, and 24 other. Appendix 4 lists the representors.

Methods

Figure 4.2 depicts the breakdown of representations according to methods. Stalls were the method that provided the most representations (41%), followed by Co-Create (28%), and emails (18%).

Despite stalls being the most popular engagement method, when comparing digital methods – Co-Create, emails, and online questionnaires – against in-person methods – stalls and hard copy questionnaires, digital methods made up 58% of the representations, in comparison to the 42% of in-person methods.

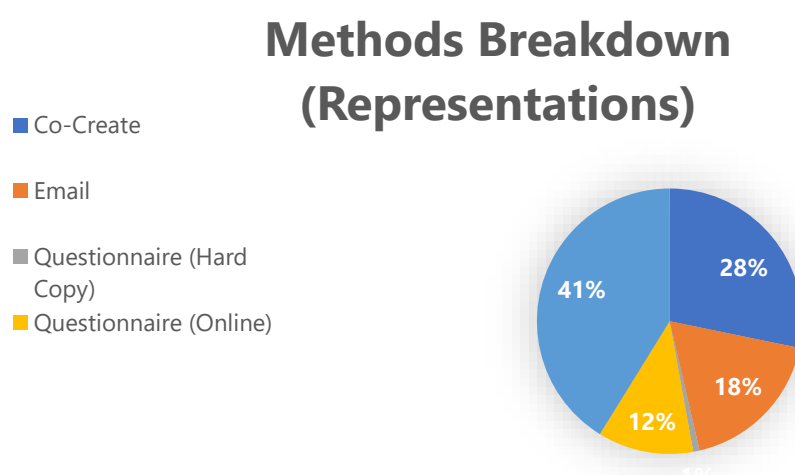


Figure 4.2 – Methods Breakdown (Representations)

Furthermore, when analysing the method choice according to representor type (figure 4.3), residents were more likely to use Co-Create and stalls, whilst more formal representors, such as developers and statutory consultees opted for emails as a method for submitting representations. Therefore, the type of representor influenced the choice of engagement method.

³ One of the elected officials' representation was composed by four elected officials.

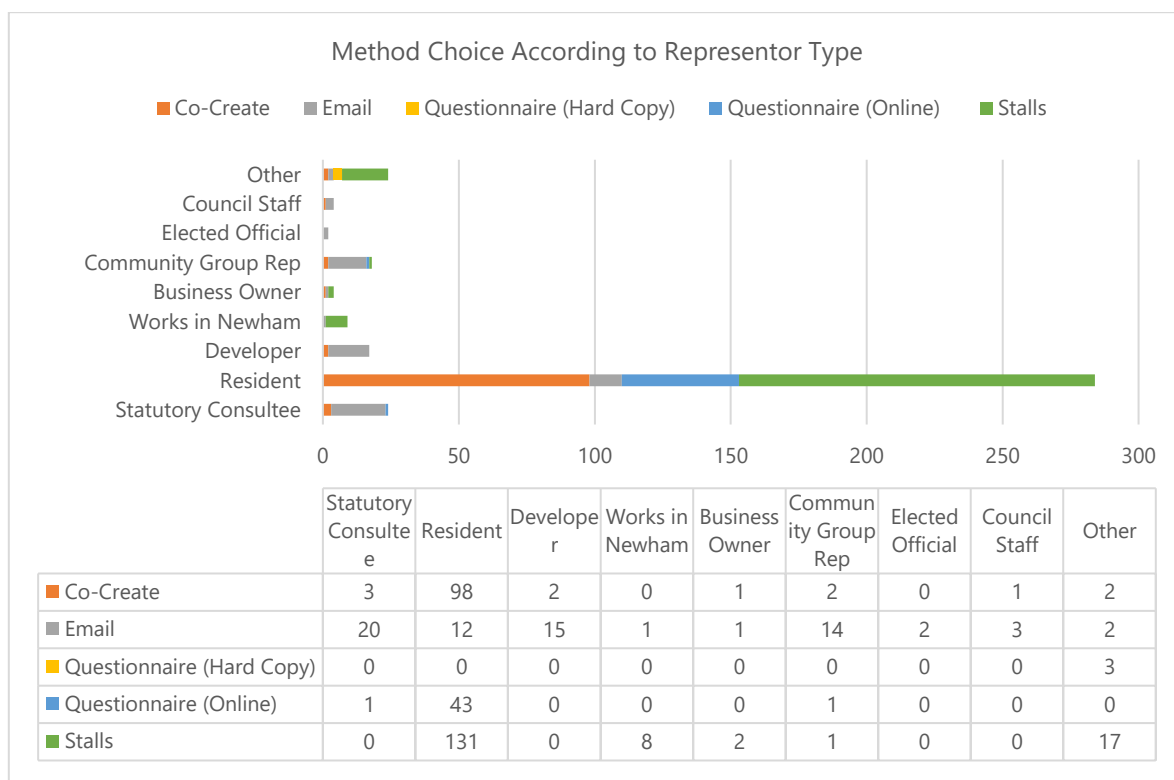


Figure 4.3 – Method according to repesor

Similarly, the method type influenced the length of the response. As seen in the pie chart below (Figure 4.4), repesors that submitted responses via questionnaires tended to develop longer answers that resulted in more comments than those that were responding at stalls. This is because formats such as the questionnaires encouraged more in-depth answers with more comments (44%), whilst formats such as stalls were devised to encourage a more informal conversation between Officers and residents, leading to fewer comments (15%).

Methods Breakdown (Comments)

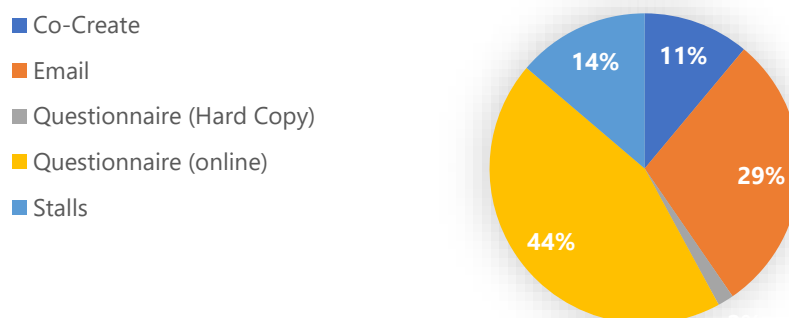


Figure 4.4 – Methods Breakdown (Comments)

Themes

During the process of logging all 387 representations, we broke down representations into individual comments, and categorised each of the comments into the planning themes that make up the chapters of the Issues & Options document.

From the graph below (Figure 4.5), it can be observed that the most commonly mentioned planning theme was Vision – with 769 comments – followed by Community Facilities (718 comments), and Green & waterspaces (572 Comments).

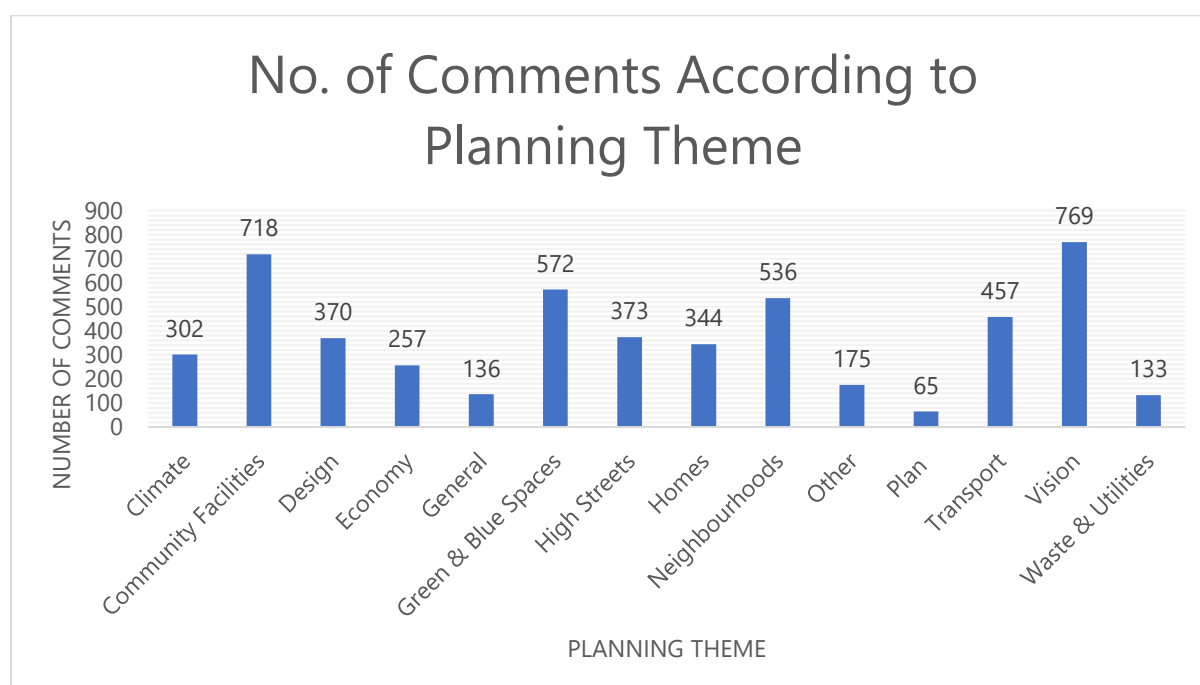


Figure 4.5 – Comments according to theme

Demographics

The following tables (Figures 4.6, 4.7, 4.8, 4.9, 4.10 & 4.11) depict the demographic breakdown of respondents according to ethnicity, level of employment, sexuality, religion, age, and gender. It is noted that out of the 386 representors, only 117 provided some level of demographic information, therefore the following findings are not in any way wholly representative of the overall representors.

Nonetheless, the findings do suggest certain gaps based on the [demographic data of Newham](#), with potential ethnographic solutions to address them in the next round of consultation.

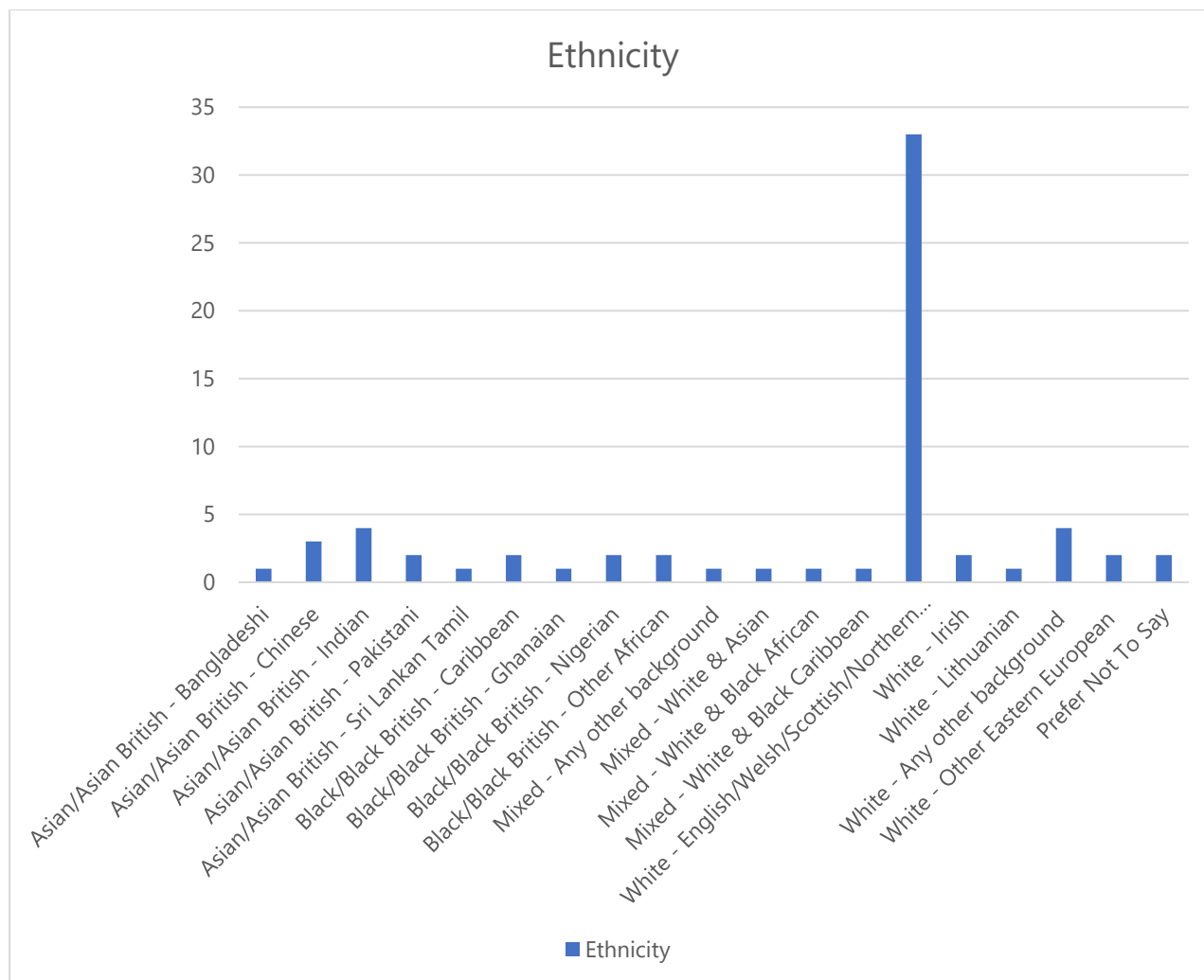


Figure 4.6 – Ethnicity breakdown

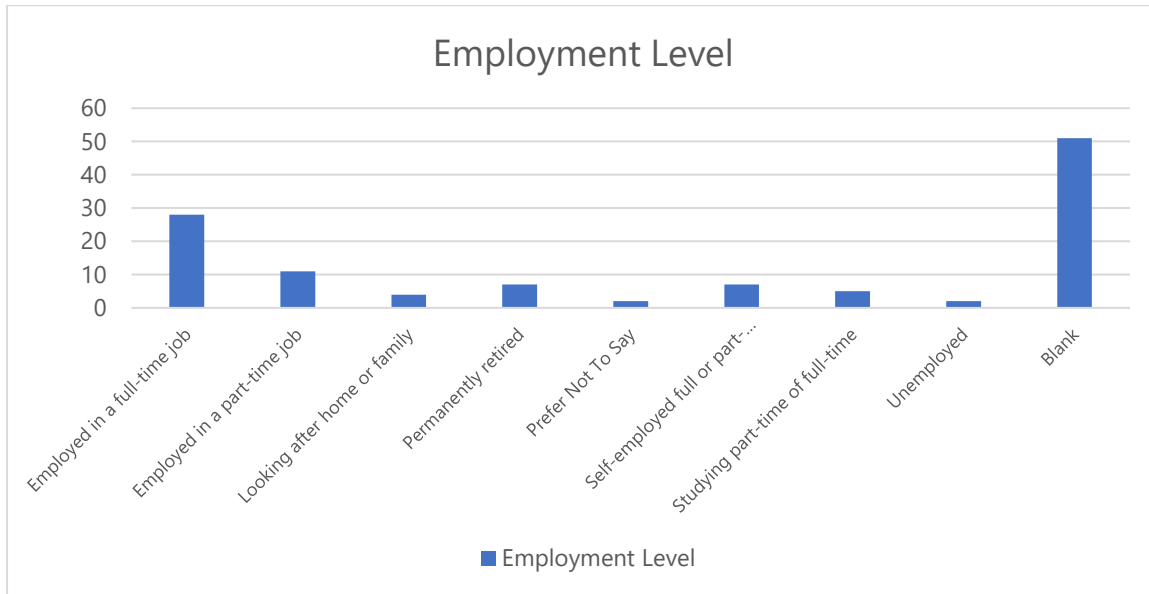


Figure 4.7 – Employment/student breakdown

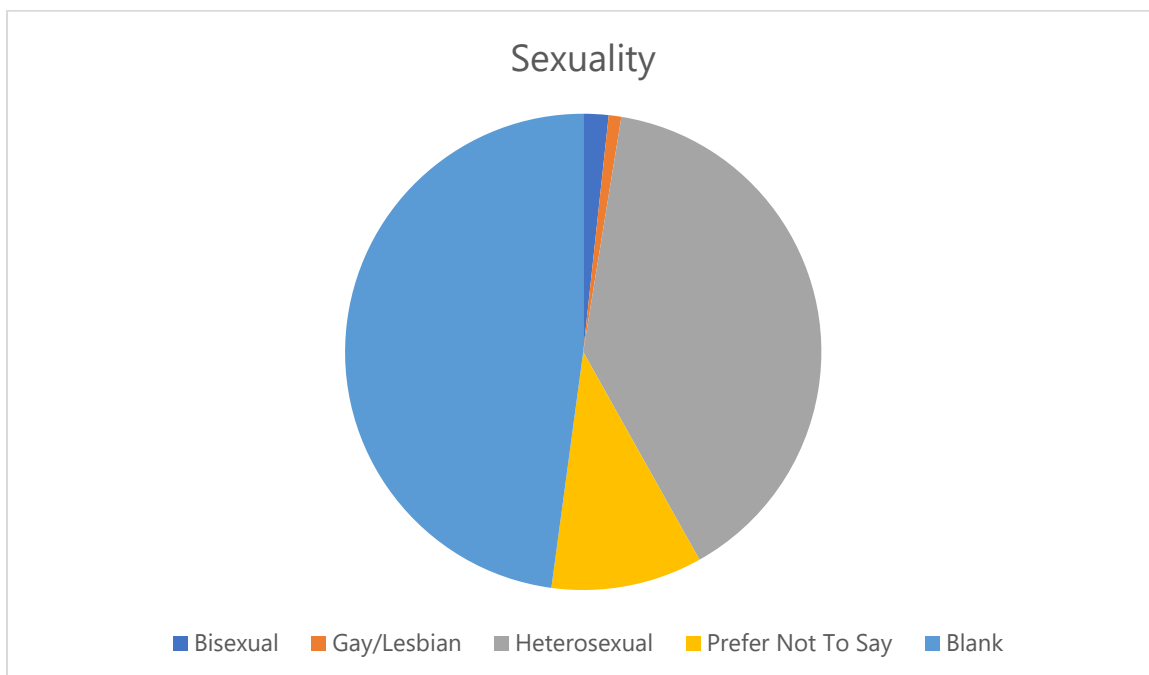


Figure 4.8 – Sexuality breakdown

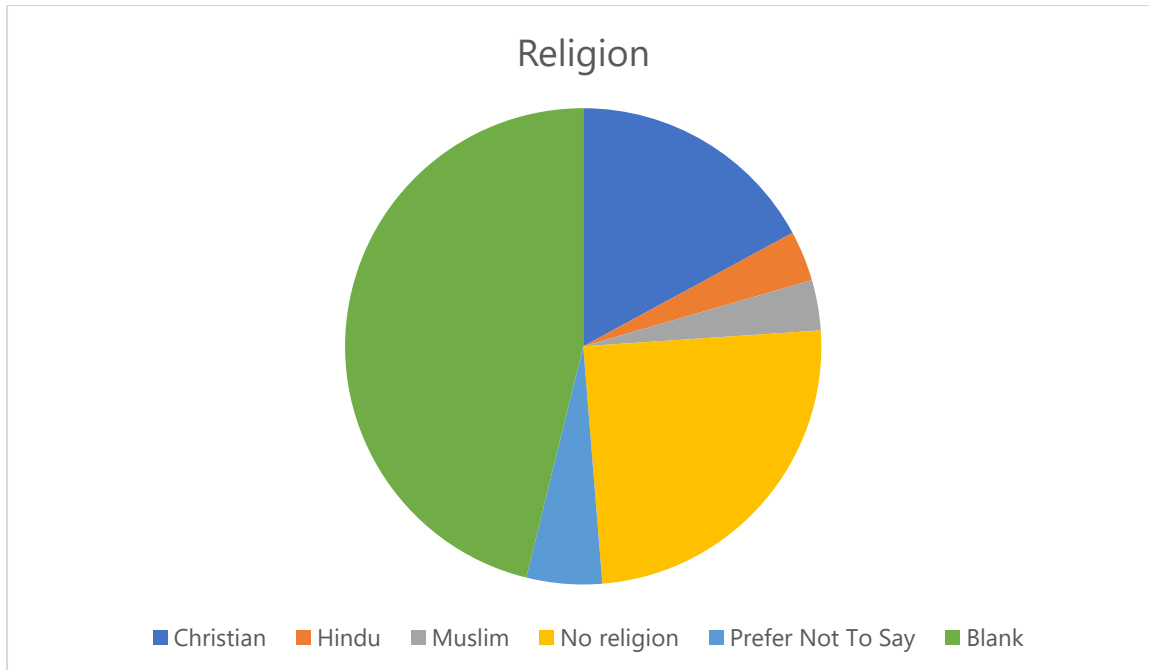


Figure 4.9 – Religion breakdown

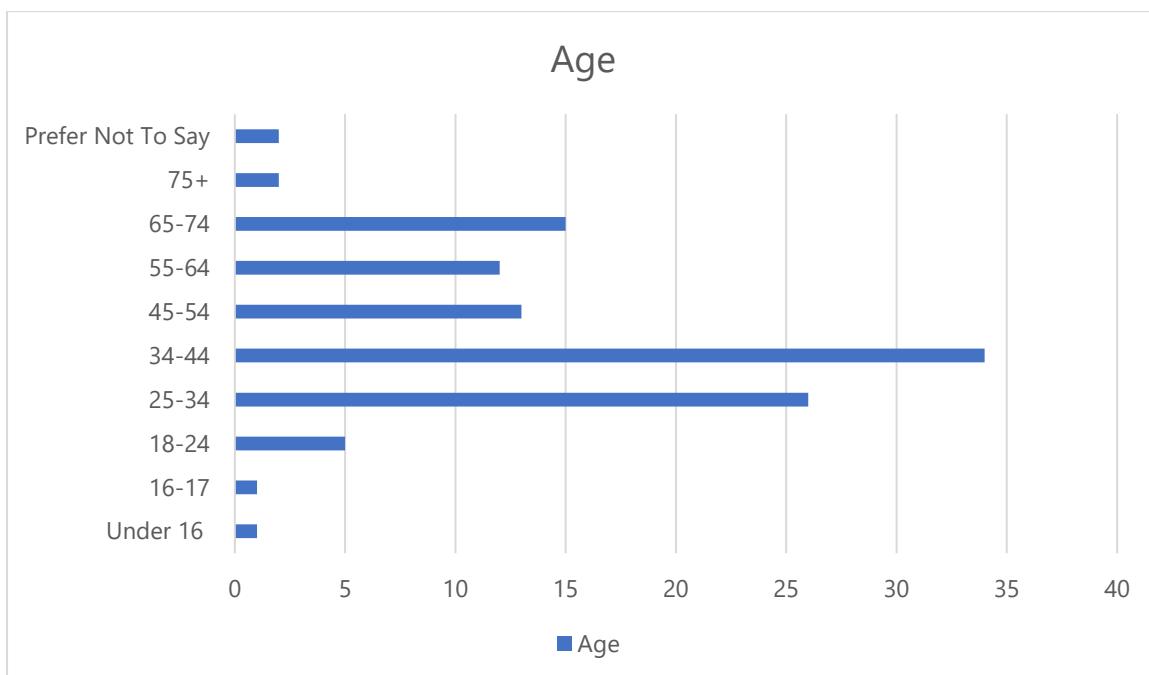


Figure 4.10 – Age breakdown

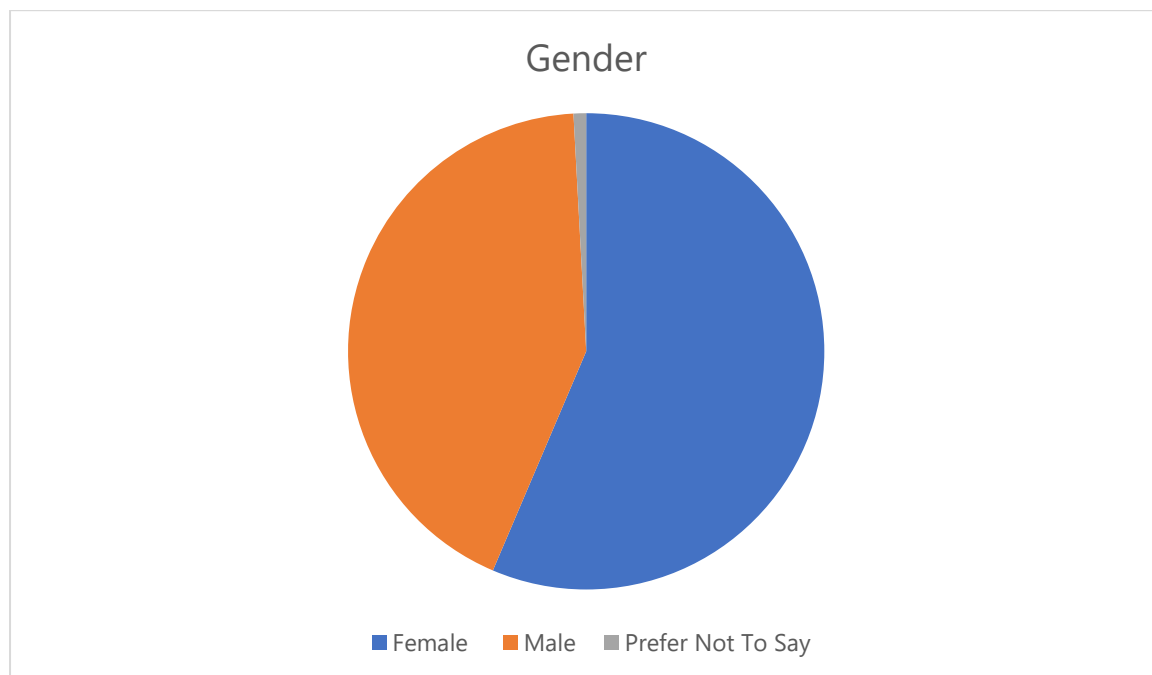


Figure 4.11 – Gender breakdown

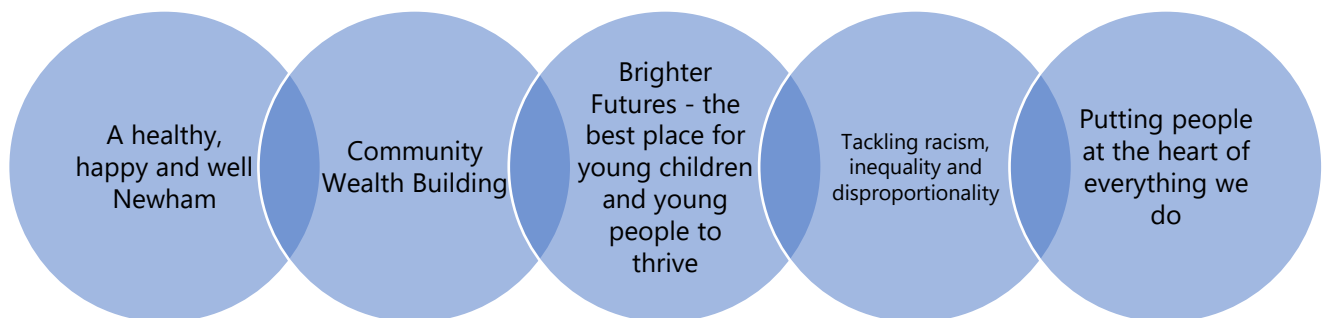
5. Summary of responses

This chapter breaks down the comments received into answers to the questions set out in the Issues & Options document. Comments which do not answer a specific question were added to the 'General' box.

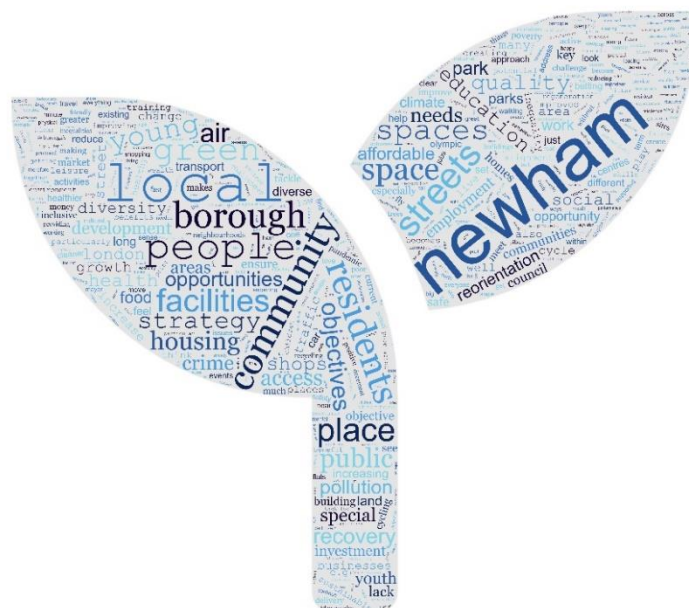
5.1 Our Vision for Newham

This theme seeks to address the vision and objectives that will guide the whole Local Plan. The Local Plan vision has a 15-year timeframe, and is both aspirational and realistic, focusing on the challenges and opportunity for Newham.

The vision includes:



This theme received 769 comments from 169 representors.



Q1. Should the vision and objectives be framed around the Council's Recovery and Reorientation Strategy?

- 41 stakeholders, including residents, the Port of London Authority, LB Redbridge, Newham Sixth Form College, NHS Urban Development Unit, University of East London, University College London, Mayor of London, developers, LB Waltham Forest, and the Lea Valley Regional Park Authority, support using the Council's Recovery and Reorientation Strategy.
- 5 stakeholders do not support using the Council's Strategy because the vision should not be shaped around the Covid-19 recovery strategy and clichés, but rather on long-term goals, talent, innovation, creativity, and outside investment. In contrast, the NHS Development Planning Unit suggests there should be greater reference to the Covid-19 recovery.
- 3 residents do not support the vision because it is not ambitious enough, especially in terms of climate and developer influence, 1 resident said it is too broad and vague, and 2 residents fear no changes will take place.
- LBN Public Health and five Councillors said the Health & Wellbeing Strategy should also be part of the vision for the plan, and there should be more of an emphasis on the need to recover from Covid-19, addressing health inequalities, and sustainability.
- Newham Sixth Form College said that the vision should be shaped around the provision of high quality education, training, and employment opportunities in order to meet the borough's objectives.
- The NHS Development Planning Unit supports the need to deliver and fund community facilities, as well as address climate change, make neighborhoods inclusive and accessible, and plan for the changes in the way we work, socialize, and shop.
- The vision should also be framed around sustainability, provision of facilities, cleaner streets, increasing cultural provision and by working with residents to achieve objectives and providing more specific details on how it will be achieved.

Officer Response:

Officers acknowledge the large number of responses (769) received on this section of the Plan. In many cases these comments relate to other themes and elements of the Local Plan, and where they do, they have been considered and used to inform the development of those policies too.

We welcome the support for framing the vision and objectives around the Council's Towards a Better Newham Strategy. However in the time since the Issues and Options document was developed, the Council has approved a new Corporate Plan: Building a Fairer Newham. This new strategy builds on the objectives and achievements over the last four years delivered through the Towards a Better Newham Strategy. Building a Fairer Newham will now provide a structure, underpinning the objectives and policies in the rest of the document. Other elements mentioned by respondents have also been included as subsections of the objectives. This includes specific reference to reducing health inequalities; commitment to tackling the climate emergency and increasing climate resilience; creating inclusive and accessible neighbourhoods with access to local shops and services; increasing access to education, training and employment; a focus on cleaner streets and embedding the role and value of coproduction.

Officers recognise and support residents' priority to see the plan being delivered. One of the crucial tests for the Local Plan is that it is deliverable and the range of evidence base documents which support the Plan, provide further detail to demonstrate this. We also work closely with colleagues across the council, as well

as partner organisations such as the Mayor of London and Transport for London, to ensure that key parts of the Plan come forward as anticipated.

Q2. Is there anything missing from the vision and from Table 1 to ensure we meet Newham's needs?

- Greater reference around the need to recover from Covid-19 is missing, including the changes in how we work, socialize, and shop.
- Developers think that ensuring there is an adequate supply of land for homes and employment is missing.
- 5 comments, including one from the Monega Association, said real resident engagement and co-production, as well as a focus on the area's history and diversity, are missing.
- 2 residents said that Queen's Market needs to be better addressed in the Local Plan, including enhancements and new toilets.
- 3 residents said that the funding strategy for delivery is missing, including funding for small businesses.
- 13 comments mentioned the need to support young people in accessing education and training, enabling them through better opportunities, providing more youth clubs, and involving and listening to them.
- The Mayor of London said that the vision should consider the GLA's pandemic recovery missions.
- 2 residents pointed out the lack of clarity in the statistics and terms provided within the Vision chapter.
- Other missing elements: how to attract investment and support the local economy, how to increase provision of community facilities, how to address the climate emergency, inequality and poverty, and crime and fly-tipping, how to green the borough, how to improve road safety and active travel, and how to create 15-minute neighborhoods.

Officer Response:

The Towards a Better Newham Strategy outlines Newham's recovery and reorientation approach following Covid-19 and responds to both the underlying inequalities and structural challenges in the borough, exacerbated by Covid-19, and how we will respond to changing work, shopping, socialising trends, accelerated by Covid-19. By building the vision and objectives around the elements of this strategy, we will be responding to the need to recover from Covid-19. The Strategy also has significant overlap with the Mayor of London's Recovery Missions and there is an objective in the Local Plan which addresses each of the nine Missions.

The objectives have been revised to address a number of the suggestions provided by respondents:

- The need to ensure a sufficient supply of land for homes and employment are implicit in two key objectives: We will deliver sufficient homes to meet the diverse needs of our population and the quantity, range and affordability of employment space will be improved.
- Co-production and co-design are key principles underlying the Local Plan and are reflected in the vision, objectives and policy BFN2.
- A new objective specifically addressing heritage has been added: We will ensure our unique and diverse heritage is protected and celebrated, requiring new development to be well-designed and that old and new buildings are well integrated.

- Active travel, safety, tackling the climate emergency, reducing poverty and supporting the local economy have been emphasised in the objectives.

It is considered that the provision of community facilities, addressing crime and fly-tipping, greening the borough and creating 15 minute neighbourhoods were already sufficiently addressed in the objectives.

Creating the Best Place for Children and Young People to Thrive is a key objective in the Towards a Better Newham Strategy and carries through into the Draft Local Plan vision and objectives, with specific objectives around ensuring access to social, play, learning facilities as well as ensuring access to high-quality affordable housing and high-quality job opportunities.

Responses regarding Queen's market have been addressed in the site allocation relating to that facility.

The Local Plan influences delivery in two main ways – directly by creating policies which shape what is delivered and indirectly by requiring developer contributions to mitigate the impact of development. The approach to collecting developer contributions is outlined in policy BNF3. One key developer contribution – which is outlined in J4 – is support for residents to access new jobs in the borough.

The Draft Local Plan will also include a glossary, which we hope will provide greater clarity on terms.

Q3. What do you think makes Newham special?

- 51 responses from residents said that Newham is special because of its diversity and culture, including skilled and connected residents, and inclusive and vibrant communities.
- 21 comments said that Newham is special because of its sense of community and support, including the provision of activities during the pandemic and its friendliness.
- 18 responses said that parks and nature make Newham special, including good open spaces such as Wanstead Flats, great parks and river fronts, Newham City Farm, and overall proximity to green spaces.
- 25 comments said that Newham is special because of its community facilities, including high streets, local options, good facilities such as libraries and those in the Olympic Park, and a good offer for young people.
- 10 responses said that transport and connectivity make Newham a special place, including great transport links to Central London, and a variety of travel options.
- 8 comments said that Newham's architecture, history, and heritage make it special, including distinctive neighbourhoods' character, low-level buildings, local history, and conservation areas.
- 4 residents said Newham is not special, whilst 1 resident said it is special because it hasn't changed in the last twenty years, and two residents said it is unique in itself.
- Developers think Newham is special because there is significant opportunity for development, including employment land.
- 1 resident said that the vision needs to focus on timely delivery.
- Other elements mentioned that make Newham special include: relatively affordable housing, good work places, the Olympic legacy, City Hall in Newham, its quietness, its young residents, and resident involvement.

Officer Response:

Respondents' answers on what makes Newham special have shaped the vision and objectives. In particular, the focus on diversity, culture, sense of community and local pride. The role of Newham's population – its youth and diversity – and the importance of their ongoing involvement in the planning and development process have been emphasised. We have also sought to reflect the vital role of parks and other open spaces, community facilities, high streets, transport links and offer for young people.

The Vision seeks to balance the need to protect the historic and current aspects of Newham which make it special with the need to capitalise on the future opportunities, such as the arrival of City Hall and significant opportunities for change.

Q4. What would make Newham a better place to live? To work or run a business? To grow up in?

- 3 residents said public spaces that showcase the community's diverse talents and increase the sense of pride and positivity within residents would make Newham a better place.
- 6 residents and LBN Public Health think Newham needs to have a better sense of community and local pride, including community wealth building, less racism and homophobia, and more family-friendly spaces.
- 34 residents mentioned that cleanliness would make Newham a better place, including addressing fly-tipping, tackling air pollution, and having cleaner streets.
- 27 residents voiced that more affordability would make Newham a better place, including:
 - More incentives for businesses;
 - More affordable/free services such as gyms in public spaces;
 - More affordable shopping and housing;
 - Ensuring that new developments do not make areas less affordable; and
 - More support toward people without housing and people with low incomes.
- 28 residents said that Newham needs better transport infrastructure to make it a better place, including:
 - Better bike paths, wider pavements, less busy roads;
 - Infrastructure to promote active travel, including bike hangars and rentals;
 - Car clubs and discouragement of private car use; and
 - More school streets and fewer cars in residential streets.
- Implementing the 15-minute neighbourhood would make Newham a better place, including:
 - Need a wider variety of uses in high streets, and fewer takeaways and betting shops; and
 - Need better and more available community facilities, educational facilities, greenspaces, and youth facilities.
- Need better support from the Council to implement resident-led ideas.
- Need more access to jobs.
- 10 residents said that addressing crime would make Newham a better place.
- 1 resident said that Newham would be better if public services didn't become corporate in approach.

Officer Response:

Responses to this question have informed the vision, objectives, spatial strategy and policies in the Draft Local Plan. In particular creating local pride is emphasised in the vision and is one of the reasons behind the

focus on co-design and co-production in the Draft Local Plan. The importance of delivering family-friendly spaces, community spaces and places for social interaction has been highlighted in the vision and objectives and will be delivered through policies in the community facilities and design sections of the Local Plan as well as through specific infrastructure requirements on different sites in the borough.

The importance of improving the cleanliness and safety of the borough has been recognised. Planning has a limited role in ensuring cleaner and safer streets but the new policy around Public Realm Net Gain in the design policies will ensure higher quality streets, pavements and public spaces in the borough, which we hope will improve our streets. The waste policies in the Plan also introduce more rigorous design requirements for the management of household waste, which should reduce dumping and rubbish mismanagement. We have also included design principles which should ensure that the design of developments and public spaces improve safety by increasing lighting, street activation and clearer site lines. In addition, these comments have been passed onto our colleagues in the public realm, community safety and waste teams.

Ensuring the affordability of key services and housing in the borough has been addressed through the ongoing strategic commitment to deliver 50% affordable homes, of which the majority will be for social rent. We have also introduced new policies to require the delivery of affordable retail space, the safeguarding and delivery of new markets (as an important provider of low cost goods) and a requirement for new and replacement community facilities to sign up to a Community Use Agreement which includes commitments around the cost of using their space. The importance of high-quality spaces which are free to spend time in, is also addressed in our Open Space Policy through the commitment to Public Realm Net Gain and through site allocations which will require the delivery of new parks.

Responses highlighting the importance of active and sustainable travel measures to improve the borough have been incorporated into the vision and objectives, and measures to deliver this have been incorporated into the transport policies in the Local Plan which require developments to provide cycling infrastructure and car club provision, as well as the neighbourhood policies which will include the delivery of improved walking and cycling connections across the borough.

Responses regarding the implementation of 15 minute neighbourhoods have been reflected in the vision and objectives and the high streets, community facility and greenspaces and water spaces policies, which seek to deliver a greater variety of high street uses, reduce takeaway and betting shops and increase the number of parks and community facilities in the borough.

Q5. What are your hopes for the future of Newham?

- 17 comments, one of which was from the Royal Docks' Engagement Team, voiced hopes for better support for young people, including more facilities for young residents such as skate parks, youth clubs and music spaces, more opportunities/choices especially for those in disadvantaged positions, and better response to the youth-related issues arising from the pandemic.
- 12 comments said they hope for better parks, greening, and biodiversity, including re-wilding, re-instating Newham City farm, and greenspaces for disabled people.
- 11 responses mentioned the hope for more community facilities, high-quality education, leisure centres and places to meet, both indoors and outdoors, to share knowledge and promote support networks that bring people together.
- 10 comments hope that changes in Newham suit all residents and address Newham's specific needs, such as improving the lives of those economically-excluded, focusing on a better sense of community, and maintaining its diverse character.
- 6 residents said they hope Newham becomes cleaner, including the introduction of food waste recycling, the provision of more bins, and less fly-tipping.
- 6 residents said they hope for a better mix of shops, including the reduction of betting shops and chicken shops, improved local facilities to avoid leaving the borough to meet people, and high streets to be proud of.
- 5 comments voiced the hope for more local investments, development, and regeneration, including the development of the docks uplifting run-down areas, and investing in community-led projects.
- 5 comments mentioned the hope for reduction in traffic and improved streets and active travel, such as promoting alternative methods of transport, more school streets, and more cycle facilities.
- 5 comments hope for more support in the provision of culture, including community and arts events, free music events, cultural spaces for young people such as Rich Mix, and more museums.
- 5 responses said they hoped for a reduction in poverty and inequality, as well as an increase in health in ways that genuinely support the community, especially those without shelter and in low incomes.
- 5 comments said they hope for less developments and a change to the current regeneration approach, including less technocratic planning, no more tall buildings, and promoting a balance between housing and green spaces.
- 5 responses hope for more affordable and well-managed housing for young people to be able to stay in the borough, and to address overcrowding.
- Other comments mentioned the hope for: better air quality and biodiversity, better and more aesthetically-pleasing design, greener jobs, improved public transport, making Newham a London-leading borough that residents are proud of, more and better jobs, better promotion of innovative and diverse businesses, protection of public houses, reduction of crime, more affordability in shopping, more inclusivity, more support for vulnerable residents, more listening from the Council, and more effort to tackle the climate emergency with electric cars, solar panels, and sustainable spaces.

Officer Response:

Officers welcome comments regarding respondents' hopes for the future of the borough. Responses to this topic were understandably wide ranging and overlapped with responses to other questions in this section. The ways in which we have embedded these hopes in the vision and sought to deliver them through the objectives and policies is outlined below but also in the answers to Q4 and Q6.

Creating the Best Place for Children and Young People to Thrive is a key objective in the Towards a Better Newham Strategy as is the commitment to Put People at the Heart of Everything We Do and these carry through into the Draft Local Plan vision and objectives, with specific objectives around ensuring access to social, play, sports, culture and learning facilities for young people as well as the wider community. This will be delivered through specific policies and site allocations in the Plan, which seek to protect and deliver further community, sports/leisure facilities and cultural spaces, including youth facilities and a skate park in the borough.

Hopes for a greener borough are embedded in our objective to create a Healthy, Happy and Well Newham and the greenspaces and water spaces policies outline how we will protect and enhance existing parks and open spaces, deliver new parks, re-wild and green our streets and increase biodiversity. The Local Plan cannot reinstate Newham City Farm, but can ensure that it remains protected as greenspace.

As outlined above, responses highlighting their hope for reduced traffic have been incorporated into the vision and objectives and measures to deliver this have been incorporated into the transport policies in the Local Plan which require developments to limit private car parking provision, provide cycling infrastructure and car club provision and the neighbourhood policies which will include the delivery of improved walking and cycling connections across the borough.

A number of comments have referenced the need for the Local Plan to provide more local investment, development and regeneration. While other comments have referenced their hope for less development and more protection of open spaces. Further comments have hoped that any development should be to the benefit of all residents, in particular those in poverty or currently excluded. The spatial strategy in the Draft Local Plan, has sought to balance these considerations. The Draft Local Plan moves from the current Local Plan approach of five spatial areas to 16 neighbourhood policies. Each of these includes site allocations, which identify where change can occur and what it should include (to meet the needs of that neighbourhood as well as of the wider borough), specific design policies (reflecting the character and sensitivity to change of each neighbourhood), and indicative heights and zones for tall buildings. We hope this approach provides the nuance needed to direct growth sensitively and in a way that meets the needs of local residents. Borough-wide policies requiring the delivery of affordable housing and financial support for the Council's job brokerage service should also help reduce poverty, and increase access to jobs and to high-quality housing for all, including for young people who may currently feel unable to stay in the borough.

Q6. What are your fears for the future of Newham?

- 35 residents voiced their fear over lack of safety and the increase of crime, especially drug and gang-related violence, early morning/late night hours, and racism and homophobia.
- 24 comments shared fear of growth not being fairly distributed, with continuous issues such as gentrification, displacement, unaffordability, inequality, segregation, and poverty.
- 8 residents said they fear increasingly poor quality shopping and high streets, dominated by chicken shops and betting shops, not having a place to shop apart from Queen's Market, and no access to healthy food.
- 7 residents fear the increase in traffic and pollution due to insufficient support for sustainable transport, which creates worse health outcomes for children, lack of safety for cyclists, pollution caused by Silvertown Tunnel, and rat running.
- 8 comments said that they fear that nothing will change, with no long-term vision, a failure to take advantage of the Elizabeth Line, and neighbourhoods not meeting their maximum potential.
- 8 residents and Stephen Timms MP voiced their fears of overdevelopment, such as becoming a dormitory for the city, tall buildings, knocking down existing housing stock, and concrete jungle.
- 5 comments said they fear ongoing cleanliness issues, including fly-tipping, littering, and dirty streets.
- 5 responses mentioned the fear of loss of community spaces, not enough youth spaces, educational spaces, and spaces for older people.
- Other fears mentioned in comments include: nothing being done to address climate change, hampered growth, no actual delivery, no protection of biodiversity and greenspaces, political concerns, and poor quality of development.

Officer Response:

We welcome respondents' views on their fears for the future of Newham. We have sought to address these by developing objectives and policies which seek to prevent these outcomes.

As outlined in response to Q4 above, planning has a limited role in ensuring cleaner and safer streets but the new policy around Public Realm Net Gain in the Design chapter will ensure higher quality streets, pavements and public spaces in the borough, which we hope, will improve our streets and public spaces. The waste policies in the Plan also introduce more rigorous design requirements for the management of household waste, which should reduce dumping and rubbish mismanagement. We have also included design principles which should ensure that the design of developments and public spaces improve safety by increasing lighting, street activation and site lines. In addition, these comments have been passed onto our colleagues in the public realm, community safety and waste teams.

We note fears around unaffordability, gentrification and displacement. Policies which: retain our strategic target of 50% affordable housing (the majority of which are for social rent), replace affordable housing when redevelopment occurs and protect family housing, all seek to ensure that local residents benefit from growth and development in the borough.

Policies in the High Streets section aim to ensure that everyone in the borough lives within 15 minutes' walk of two shopping areas – ensuring access to a choice of shopping locations. Our current policies on betting

shops and fast-food takeaways are already stringent but we are enhancing these policies so that, despite not being able to remove those already in operation, we can limit their increase.

As outlined above, the spatial strategy in the Draft Local Plan, has sought to balance considerations around maximising opportunities for growth and change while resisting over-development. The Draft Local Plan moves from the current Local Plan approach of five spatial areas to 16 neighbourhood policies. Each of these includes site allocations, which identify where change can occur and what it should include (to meet the needs of that neighbourhood as well as of the wider borough), specific design policies (reflecting the character and sensitivity to change of each neighbourhood) and indicative heights and zones for tall buildings. We hope this approach provides the nuance needed to direct growth sensitively and in a way that meets the needs of local residents. Borough-wide policies requiring the delivery of affordable housing and financial support for the Council's job brokerage service should also help reduce poverty and increase access to jobs and to high-quality housing for all, including for young people who may currently feel unable to stay in the borough.

A commitment to ensuring growth is supported by sustainable transport runs through the Plan. This includes Transport policies which require permit-free developments, and prioritise provision of bike parking and the delivery of walking and cycling connections. Strategic projects, like Silvertown Tunnel, cannot be influenced by the Local Plan, but we are making the changes we can to support a reduction in car use and promote active travel.

The community facilities policies have sought to address concerns regarding the loss of community facilities and the need for more, by giving greater protection to existing facilities and making it easier to deliver new facilities in a range of locations.

With regard to tackling the climate emergency, the Draft Local Plan policies require developments to meet the rigorous standards (resulting in significantly lower carbon use than our current policies) and which will be required if we are to meet Newham's, London's and the UK's current climate targets.

Q7. Should we have one overarching policy which highlights what sustainable growth is in Newham or should we have a set of objectives and ensure we deliver against the five principles and eight pillar in the relevant policy topics?

- 22 residents and LB Waltham Forest favoured a set of objectives based on the Council's principles and pillars, as opposed to 3 residents who favoured a single overarching policy and 1 that wants both
- Residents also voiced that establishing clear definitions and terminology would be useful, and that regardless of the outcome, the chosen approach needs to be effective

Officer Response:

Officers acknowledge the majority support for having a series of objectives based on the Council's Towards a Better Newham Strategy principles and pillars. This has been the approach taken in the Draft Local Plan. The objectives can be found in Section 2 Vision and Objectives.

There were no workshops for this theme.

Q1. Do you agree with the proposed changes?

- 47 respondents, including Stephen Timms MP, UCL East, Mayor of London, developers, TfL, LB Redbridge, and LB Waltham Forest, support the proposed neighbourhood changes, specifically 15-minute neighbourhoods, the use of maps and diagrams, and a design-led approach to site allocations. The NHS Urban Development Unit, LB Redbridge, and developers support the integration of site allocations into the plan. The Royal Docks and Silvertown Quays was provided as an example of benefiting from this approach.
- The Mayor of London supports the Characterisation Study approach and recommends that policies be in line with the London Plan. They also support the transition of planning powers from the LLDC and for key sites to be included in the Arc of Opportunity. The approach to the LLDC is also supported by the Lea Valley Regional Park Authority.
- Historic England welcome the design-led approach given this approach allows for historic environment issues to be taken into account and advised that London Plan HC1 should be reflected in the plan along with advice in the Historic England Site Allocations Note.
- The Environment Agency stated that the site allocation process should include producing a Strategic Flood Risk Assessment and allocating sites in flood risk areas as a last resort. The phasing of sites should take account of the need to relook at the Sequential Test as sites come forward. The Environment Agency also provided guidance and requirements for groundwater and contaminated land, piling and foundation works, industrial sites and cemetery developments.
- Some developers said they would like to be involved in the preparation of the Characterisation Study. Others argued that smaller-scale employment functions work well under the 15-minute neighbourhood concept and design-led approach but not larger, strategic employment needs and cross-boundary sites.
- 11 developer comments said a design-led approach should be adapted for larger sites or strategic sites given their complexity and ensure they are sufficiently flexible. Developers request that policy designations are reviewed and that site allocations should include a minimum number of units.
- 2 residents said that the proposed changes are not sufficiently clear, and 4 residents do not support the proposed changes. One resident raised concern about current policy being ineffective.
- The Port of London Authority support the principle of Albert Island as a strategic scale yard.
- Residents said that neighbourhoods also need better active travel infrastructure, better community facilities, better connectivity between neighbourhoods, and the protection of parks and greenspaces.

Officer Response:

We welcome the broad support for the approach to the neighbourhood policies, including the 15 minute neighbourhood approach, the design-led approach to site allocations and integrating the site allocations into the neighbourhood policies. The Mayor of London's support for the approach to the Characterisation Study and the LLDC transitional period is welcomed.

We recognise the complexities of bringing forward large sites. The approach to site allocations is consistent with the London Plan design-led approach. The draft site allocations are positively prepared and aspirational but deliverable in line with the National Planning Policy Framework. The site allocations do not include minimum housing numbers to ensure they are appropriately flexible. They have been prepared following the Site Allocation Methodology Note and reflect reviewed policy designations informed by the Local Plan evidence base, such as the Characterisation Study. This process has taken into account heritage and flood risk considerations and the Strategic Flood Risk Assessment is currently being updated.

We recognise that some stakeholders do not support the 15 minute neighbourhood approach, particularly for employment uses. 15 minute neighbourhoods are a key pillar of the Council's Towards a Better Newham Strategy and will ensure every resident in Newham is able to live in an accessible and inclusive neighbourhood which provides their social, civic and economic essentials. The strategy is not intended to create isolated and self-sustaining areas but to support access to services and facilities for everybody. The 15 minute neighbourhoods therefore form part of a wider network of connected neighbourhoods, which gives residents a choice in where they access different facilities and services, whether that is within their own neighbourhood or within the wider network. The neighbourhood policies work alongside employment policies to identify the role of small-scale employment uses as part of the 15 minute neighbourhood.

The approach to 15 minute neighbourhoods in the Draft Local Plan and the neighbourhood policies has been informed by consultation and engagement with residents, businesses, community groups and other stakeholders during the production of the Newham Characterisation Study and the Citizen's Assembly held in January and February 2022. The neighbourhood policies work alongside other policies in the Draft Local Plan to deliver new and improved walking and cycling routes and community facilities and to protect Newham's open spaces.

Q2. Are there other changes we should consider?

- 5 residents said no changes are needed.
- 3 residents said the borough's historic environment should be protected, particularly in Stratford.
- 37 respondents, including Friends of Queen's Market, said Green Street, Hamara Ghar, and Queen's Market should be improved and protected, with a new vision developed for it. Some respondents argued the strategic site allocation should be removed.
- Residents said that the following should be considered about neighbourhoods: increasing greenery and open space, making sure they are not gated, improving cleanliness, promoting active travel, reducing poverty, and addressing needs of young people. The neighbourhood policies should improve connections between existing and 'new' communities in the borough.
- Developers, residents and landowners identified a number of changes to existing site allocations or proposed new sites and policies:
 - Developers said that building heights in S11, S15, S18, S20, S21, and S23 should be reviewed given their potential to deliver new homes, and residents said that neighbourhoods need more leisure, community facilities, and parks.
 - Showcase Cinema, Beckton Alp and Gallions Reach were promoted for employment uses.
 - St William argued that S11 should be its own neighbourhood due to its role in untapping West Ham's potential and that the spatial strategy should support new transport projects such as the DLR extension to Beckton.
 - Ballymore said site allocations should reflect the up to date position on safeguarded wharves.
 - Newham Sixth Form College said that Local Plan policies should further support educational institutions to allow other uses on sites in order to improve education facilities to meet their identified needs, such as SEND provision.
 - UCL East would like to include its site as an allocation within the new Local Plan given its important role in the community and its plan to support education projects.
 - The leisure facilities at Balaam Leisure Centre should be retained alongside residential development.
 - West Ham nursery site should be protected from residential development. It should be a community facility or an extension to the park.
 - Thames Water request that the Metropolitan Open Land is removed from the Northern Lagoon at Beckton Sewage Works to facilitate new operational buildings in the future without needing to demonstrate very special circumstances and a policy is needed to support future upgrades at Beckton Sewage Treatment Works.
 - Leigh Road Sports Ground and surrounding land should form part of a new Edgelands Park and nature reserve.
- 1 resident said that it is essential for the local authority to engage with the local community in matters such as brownfield sites.

Officer Response:

The range of suggestions on changes to the neighbourhood policies and approaches to sites are welcome. The suggestions for the neighbourhood policies have been taken into account and have been reflected in the neighbourhood policies. Each of the 16 neighbourhood policies address design and heritage, public realm, Town Centres, environment, community facilities, open space and green infrastructure, public transport and active transport and links and increasing access to the River Roding. This includes a vision for Green Street and potential development options for Queen's Market. These policies work alongside other

land use policies in the Local Plan. Comments on the draft neighbourhood policies and site allocations are welcomed during the Regulation 18 consultation.

The neighbourhood policies and site allocations have been informed by landowner and developer aspirations alongside the new spatial strategy and evidence of the need for different land uses, including residential, employment and industrial, education, open space, leisure, retail and community facilities. They have been informed by the Newham Employment Land Review, Newham Retail and Leisure Study, Newham Green and Blue Infrastructure Study and the Leisure Needs Assessment. The Leisure Needs Assessment has informed the approach to leisure facilities in the Canning Town neighbourhood and the loss of facilities at Balaam Leisure Centre.

The policies and site allocations have also been informed by the review of the tall building zones in the Characterisation Study and the design-led capacity testing. The approach to site selection and site uses is set out in the Site Allocation Methodology Note and the full list of site allocations are included in the Neighbourhoods chapter of the Draft Local Plan. Some of the proposed sites did not meet the site allocation criteria because of their environmental, open space or heritage designations. Other sites, such as those proposed for employment uses only, did not meet the site allocation criteria because their delivery can be managed through other policies in the Local Plan. This is set out in the Site Allocation Methodology Note and further sites can be submitted during the consultation on the Draft Local Plan.

The de-designation of any Metropolitan Open Land will be assessed in the Newham Green and Blue Infrastructure Study.

Q3. Is there anything missing?

- 1 resident said nothing is missing in the proposed policy changes .
- Some respondents queried the rationale for changing the approach to distinguish between strategic and non-strategic sites and that sites and spatial strategy should enable new infrastructure capacity and transport projects.
- 5 residents said more engagement with the local community is necessary, developers said the Mayor of London's Good Growth objectives should be included, and residents said that more detail and peer-review is necessary to the neighbourhood approach, with clear actions for each neighbourhood.
- 10 residents said that Newham needs a skate park.
- 7 responses said that neighbourhoods should be better connected to avoid island neighbourhoods.
- 1 resident said neighbourhood safety is missing, and another resident said that new developments should produce a strategy for leisure facilities, whilst the Mayor of London said the location of tall buildings should clearly be set out.
- Residents said the Green Grid and MOL in the borough should be mapped.

Officer Response:

The suggestions to what is missing in the proposals for the neighbourhood policies and site allocations are welcome. Residents and other stakeholders will have the opportunity to comment on the draft policies and

site allocations during the consultation on the Draft Local Plan using the many methods set out in the Local Plan Consultation Strategy.

The Draft Local Plan includes site allocations that have met the criteria set out in the Site Allocation Methodology Note. This does not differentiate between 'strategic sites' and 'non-strategic sites' as set out in the current Local Plan. Site allocations including Beckton Riverside and Stratford Station set out improvements to transport capacity, which is also set out in the spatial strategy.

Tall building zones are set out in Draft Local Plan Policy D4 and site allocations include acceptable building heights for each allocation, including tall buildings. The Neighbourhood policies and site allocations include provision for leisure facilities, which have been informed by the Leisure Needs Assessment. The Leisure Needs Assessment is also considering the provision of skate parks in Newham.

The draft neighbourhood policies and site allocations address connections between site and neighbourhoods and include policies to improve the safety of walking and cycling routes and public spaces in the borough. These policies work alongside Design policies, which also set standards for safety in new developments and the public realm. The borough's green infrastructure has been reviewed as part of the Newham Green and Blue Infrastructure Study and the borough's Metropolitan Open Land will be mapped on the policies map.

Other themes:

•Beckton

- Thames Water said that a policy is needed to support future upgrades at Beckton Sewage Treatment Works and that the Northern Lagoon should be de-designated as a SINC and Metropolitan Open Land.
- 10 residents said that Beckton needs to improve as a neighbourhood, by making it safer and providing a better retail offer, better active travel, as well as community facilities, and improvement of its parks.

•Canning Town

- 2 residents said Canning Town has good green spaces, however, 1 resident said it is not safe and 3 residents said the developments have created poor living conditions.

•Royal Docks

- The Royal Docks team said more discussions are needed about district heat networks, ancillary uses, infrastructure projects, and education facilities in the Royal Docks.
- 5 residents, including the Monega Association, said that a sense of community is missing in the Royal Docks, that its areas are underutilised and needs more community facilities and accessibility, as well as retail offer, but 3 residents do say it is a good neighbourhood.

•East Ham

- 6 responses mentioned East Ham, including that it has changed for the better, but that it is also not safe and that its high street should reflect local identity.
- 5 comments said that Leigh Road Sports Ground and surrounding land should form part of a new Edgelands Park and nature reserve.
- St William said that the MOL at East Ham Gasworks should be reviewed through a design-led approach.

•Forest Gate

- 12 residents do not support the loss of Durning Hall.
- 9 residents said Forest Gate needs more community facilities, whilst 3 residents say that the neighbourhood has improved and one resident said it is not safe. Residents also said the cycling infrastructure should be improved.

•Manor Park

- 4 residents said Manor Park needs more sociable public spaces and community facilities, 3 said it needs better shops, 3 said it is a good and safe neighbourhood, but 2 said it is unsafe and should become a low-traffic neighbourhood, and 1 said facilities are predominantly for men.
- 6 residents said that cycle infrastructure in Manor Park needs to improve.

•West Ham

- 21 respondents expressed that West Ham Park should be protected from development and the former nursery should be a community facility or extension to the park.
- 4 responses said the Old Spotted Dog should be re-instated as a community facility.

Other themes (continued):

•Plaistow

- 13 responses said Plaistow Library should become a youth zone and 3 residents said that Plaistow needs more community facilities overall.

•Custom House

- 1 resident said Custom House needs a youth zone and 1 resident said its physical environment should be improved.

•North Woolwich

- 1 resident said North Woolwich needs better places to meet.

•Stratford

- The Lea Valley Regional Park Authority said that the Local Plan should include a policy to support the Lea Valley Regional Park and that the inclusion of the LLDC is supported.
- 2 residents said the Olympic Park and Cultural Quarter are an important community asset.
- 14 responses mentioned Stratford, some praising it by saying it's accessible, safe, and changed for the better, and other saying it is not safe and that it varies according to each area.
- 3 residents specifically said that the public realm and infrastructure in Stratford should be improved, however, 6 residents and the NHS Urban Development Unit said that growth should be equally distributed across the borough.

•Other:

- 19 responses suggested sites that should become community gardens, 15 responses suggested sites for community uses, 10 for general redevelopment, 7 for employment use, and 2 for market use.
- 13 responses suggested that the public realm is Forest Gate, Stratford, Romford Road, Canning Town, Beckton, and Plaistow could be improved, specifically by making it safer.
- 3 comments said Katherine Road is an important neighbourhood.

Officer Response:

The wide range of suggestions for how Newham's neighbourhoods should develop in the future are welcome. These comments have been considered alongside our Local Plan evidence base, in particular the Newham Characterisation Study, Newham Employment Land Review, Newham Retail and Leisure Needs Assessment, Newham Community Needs Assessment and the Newham Green Infrastructure Study.

The draft site allocations included in the Draft Local Plan have been selected using the criteria set out in the Site Allocations Methodology Note. The design principles in the neighbourhood policies set out how other sites, such as small sites, may come forward in each neighbourhood and these policies work alongside design and housing policies and guidance in the Characterisation Study. Sites suggested for green spaces and community gardens have been considered as part of the Newham Green and Blue Infrastructure Study.

The draft Neighbourhood policies set out improvements to the public realm in each neighbourhood and will work with Design policies which set standards for the quality and quantity of public realm and public spaces. Katherine Road is identified for its retail area in the neighbourhood policies. The road's Town Centre designations have been reviewed as part of the High Streets policies and the Town Centre Network.

Beckton

The de-designation of any Metropolitan Open Land will be assessed in the Newham Green and Blue Infrastructure Study. The de-designation of SINCs is managed through the London Wildlife Sites Board.

Draft Policy N11 sets out the vision for the Beckton neighbourhood. It includes requirements for improving the safety of walking and cycling routes and green spaces in the neighbourhood. It addresses active travel by requiring the consolidation of car parking, particularly in the Town Centre, better connections and new and improved walking and cycling routes, and support for the implementation of the Beckton Park masterplan. The policy includes a draft site allocation for part of the Beckton Town Centre to diversify the retail offer, including the evening economy and to provide new and improved community facilities.

Canning Town and Custom House

Draft Policy N5 sets out the vision for the Canning Town and Custom House neighbourhood. It includes requirements for increasing overlooking and the feeling in safety in new developments, and improving the safety of walking and cycling routes. The site allocations in the neighbourhood set out how these sites should be developed, including the public realm. The Neighbourhood policies work alongside the Housing and Design policies which set standards for the quality of new developments, including living conditions.

Royal Docks

Draft Policies N1, N2, N3, N4 and N5 set out the vision for the neighbourhoods that make up the Royal Docks and take account of the draft Royal Docks and Beckton Riverside Opportunity Area Framework. The policies and site allocations set out requirements for infrastructure requirements such as substations, schools and community facilities.

The draft neighbourhood policies and site allocations require an improved and diverse retail offer to meet the needs of local residents, including new and improved Local Centres at North Woolwich, Silvertown Quays, Connaught Riverside, Thameside West and Lyle Park West.

East Ham

Draft Policy N13 sets out the vision for the East Ham neighbourhood. The policy recognises the Town Centre's specialised character and requires development to contribute to the Town Centre's role in servicing the retail and leisure needs of the local community as well as enhance the historic shopfronts.

The site allocation for the former East Ham gasworks has taken a design-led approach to where development should be located as well as maintaining its role as a continuous chain of open space. Both the site allocation and neighbourhood policy require improved connections and accessibility to the River Roding.

Forest Gate

Draft Policy N15 sets out the vision for the Forest Gate neighbourhood. The draft site allocation at Woodgrange Road West, which includes Durning Hall, requires the provision of community facility and

retail floorspace. The site allocation will work alongside the community facility policies and high street policies in the Draft Local Plan.

The draft policy sets out how development should contribute to the role of the centre in servicing the retail and leisure needs of the community and its urban village character including thorough an enhanced retail and leisure offer, reducing the prominence of hot food takeaways and betting shops and supporting temporary or pop-up uses such as street markets. The policy also sets out requirements for improving the public realm and public spaces in the Town Centre.

The draft policy supports the implementation of Low Traffic Neighbourhoods, new and improved cycling routes and junction improvements in the neighbourhood to better improve conditions for people who cycle.

Manor Park

Draft Policy N16 sets out the vision for Manor Park and Little Ilford neighbourhood. The policy supports improvements to existing community facilities such as the Jack Cornwell Centre and supporting the delivery of the new leisure centre.

The draft policy supports the implementation of Low Traffic Neighbourhoods, new and improved cycling routes and junction improvements in the neighbourhood to better improve conditions for people who cycle.

The draft policy sets out how development should contribute to the role of the Local Centre in servicing the retail and leisure needs of the community, including thorough an enhanced retail and leisure offer, reducing the prominence of hot food takeaways and betting shops and supporting temporary or pop-up uses such as street markets. The policy also sets out requirements for improving the public realm and public spaces in the Town Centre and supports improvements to the Jack Cornwell local shopping parade.

West Ham

Draft Policy N9 sets the vision for the West Ham neighbourhood. West Ham Park has not been allocated as a development site. The use of the site for a community facility would be assessed against the community facility and green infrastructure policies in the Draft Local Plan.

The Local Plan can only encourage vacant buildings to be brought back to use. However, should the planning permission be implemented to bring the Old Spotted Dog back into use, it would be protected as a public house and community facility and any redevelopment of the site would need to meet the requirements of the community facility policies in the Draft Local Plan.

Plaistow

Draft Policy N10 sets out the vision for the Plaistow neighbourhood. Plaistow Library is a community facility and any development on this site would be assessed against the Community Facility policies in the Local Plan which protect these uses. However planning can only require it to be a community facility rather than specify the type of service, such as a Youth Zone, that should operate there. The draft site allocations

require new and improved community facilities including at Newham Leisure Centre, Balaam Street Surgery Complex and Newham Sixth Form College.

North Woolwich

Draft Policy N2 sets out the vision for the North Woolwich neighbourhood, supporting improvements to the Local Centre in terms of improved public realm and requiring new community facilities to meet local need.

Stratford

Draft Policy N8 sets out the vision for the Stratford and Maryland neighbourhood. The policy recognises the importance of the Olympic Park and the Cultural Quarter and sets out requirements to improve connectivity to these important assets.

The draft vision is to create a neighbourhood which is safe and brings together the different parts of the neighbourhood through improved connections such as new bridges and better walking and cycling routes. The policy and site allocations set out requirements for improved public realm and new open spaces.

Draft Policy N7 sets out the vision for the Three Mills neighbourhood and supports the vision of the Lee Valley Park Development Framework Area, including the conservation and enhancement of the neighbourhood's waterway and heritage character and its heritage assets. This works alongside the Green and Blue policies.

There were no workshops for this theme.

Q1. Do you agree with the proposed changes?

- 26 comments, including those from residents, LBN Public Health, NHS Urban Development Unit, and Lea Valley Regional Park Authority, agreed with the proposed changes, 6 residents partly agreed due to vagueness and concerns over delivery, 2 residents did not agree, 1 resident was unclear, and 1 resident asked how are residents and young people going to practically be involved in planning decisions
- LB Waltham Forest and University of East London support a design-led approach, and developers support design diversity to promote cultural identity and social integration
- Mayor of London and developers support a child-friendly network
- NHS Urban Development Unit and TfL support healthy neighbourhoods and the Healthy Street Framework as well as the retention of Policy SP8
- 5 comments mentioned support for Public Realm Net Gain, including those from TfL and developers
- 1 resident does not agree with tall buildings, and developers object to having prescriptive heights whilst TfL supports it
- 1 resident says more trees are needed to improve the feel of the area

Officer Response:

We note the overall support for the direction of policy change, as well as concerns relating to the application and enforcement of standards.

The Design chapter addresses the overarching qualities of designing buildings and spaces that every development should take account of, irrespective of the mix of uses proposed.

Design as a process intersects with many other themes of the Local Plan. Therefore, where design considerations are linked to particular uses – e.g. housing standards or green space design – or to the process of masterplanning and engagement/co-design, these have been included in the respective thematic chapters and are not addressed by the Design chapter policies directly. Policies are cross-referenced in implementation to help achieve an integrated approach.

Policies of the Design chapter have been formulated to address in detail the design challenges that we have identified through monitoring, engagement and professional best practice advice. The policies build on widely recognised industry standards (including the Healthy Streets Framework and Building for a Healthy Life), adapted to Newham's context and responsive to the evidence base. The Characterisation Study provides additional design guidance to support policy implementation, including on the theme of enabling cohesion and celebrating diversity.

Cultural diversity in the public realm is supported by policy D2 (Public Realm Net Gain), including through support for art installations.

The design-led approach to intensification is set out in policy D3 and builds on the London Plan and the Newham-specific recommendations of the Characterisation Study.

The quality of design will be secured through a series of tightened quality checks at various stages of the process, from the use of the Newham Design Review Panel and support of community design review,

through to conditions and developer legal obligations to safeguard the approved quality of development, and to post-occupancy surveys to ensure better monitoring of outcomes.

Support for integrating the principle of child-friendly development is welcomed. The Design chapter has informed the approach to Public Realm Net Gain (policy D2), for example by highlighting opportunities to create safer, more inclusive streets, and requiring the creation of public play space in areas where there is a deficiency.

The neighbourliness and agent of change principles have been retained and incorporated into Policy D7 Neighbourliness.

The Healthy Streets Framework sits as a baseline for many of the design policies, and particularly Policy D2 Public Realm Net Gain.

The Building for a Healthy Life (2021) standards have informed Policy D1 Design Standards.

The healthy urban planning checklist is now integrated into policy BFN3 Social Value and Health Impact Assessment.

Support for the development of a Public Realm Net Gain policy (D2) is welcomed.

Trees are addressed in detail by Policy GWS4 in the Green and Water Spaces chapter. Greenspace, greenery and street trees are supported in the Design chapter as a key principle of good place-making in Policy D1 and as part of Public Realm Net Gain policy D2.

Q2. Are there other changes we should consider?

- 3 residents said that there are no further changes that need considering and 1 resident said that design should not be a priority
- 20 comments were about tall buildings, with general lack of support due to overheating concerns, poor design, not enough public transport or high street offer to provide for large number of residents, disregarding to historic architecture, not promoting wellbeing, and lowering living standards
- 13 comments, from residents, LBN Public Health, One Newham, Environment Agency, and TfL, mentioned Newham-specific housing design, including the support of new space standards, sustainable design, need for lift provision, and implementing a local design code
- 1 resident said that standards should focus on design for family accommodation, yet developers said that they oppose new floorspace standards
- 4 residents said they support a Public Realm Plan, including the improvement of street lighting, high streets, and greenspaces, yet developers said they do not think Public Realm Management Plans are necessary
- TfL, LB Redbridge, Mayor of London, developers, and LBN Public Health support accessible child-friendly routes and networks, including the need for children to access play spaces that are safe and suitable, establishing family-friendly routes, having youth co-design, and using mapping and auditing to improve it
- 4 residents gave examples of good practices on housing and urban design, including MMC and learning from other Councils to overall implement higher design standards that are sympathetic and conserve the existing housing stock

Officer Response:

We note the view that design quality may be less important than other aspects of development. As detailed by the Royal Institute of British Architects' Plan of Work (2019), design is a process that does not start or stop with the shape and materiality of buildings and spaces, but includes considerations of the functions of the buildings and spaces and how they work together, as well as the process of design choices and decision-making. The physical layout and material choice are aspects of design that cannot on their own deliver good places. The Local Plan therefore seeks to address the full design process, including masterplanning and co-design (Policy BFN2), and requirements for a range of uses and spaces under the thematic and neighbourhood policies.

We note the concern of residents with the quality and location of tall buildings, as well as developers' in principle support for the role of tall buildings as part of varied development opportunities. The approach to defining and managing the location and impacts of tall buildings in the borough is set out in policy D4. In line with the London Plan approach, and based on the findings of the Characterisation Study, tall building zones have been identified and mapped, and include criteria on maximum height and suitable height ranges within the zone. The implementation clarifies that additional tall buildings will need to carefully address their context, including contributions to the quality of existing or proposed tall building clusters. Further details about the requirement in each tall building zone are included in the respective site allocations (in the Neighbourhoods chapter). Policy D9 of the London Plan provides a thorough framework for assessing the quality of tall buildings that has been carried into the Local Plan policy, and which is supplemented by implementation guidance addressing the criteria in the Newham context. Further, policy D3 complements the tall building strategy by supporting a design-led approach to densification that is

context-sensitive and offers a choice of housing types across larger sites, including opportunities for terraces, townhouses and lower rise blocks.

Newham-specific housing design standards have been recommended by the Characterisation Study and are taken forward as part of Housing Policy H11.

Local design codes are supported by Policy D1 as part of the co-designed process of masterplanning larger sites that may come forward in phases over a longer period of time.

The scope of Public Realm Net Gain has been defined in Policy D2 and addresses both qualitative and quantitative requirements, including the need to address the quality of existing public realm in the vicinity of the site. The policy takes forward the requirement for a Management Plan to address maintenance of the public realm interventions secured through development, and to manage the activation of public spaces in line with the Public London Charter.

Development of a network of child-friendly routes is supported by Policy D2, and seeks to build on work by the Council's Highways team towards School Streets and Healthy Streets. A Walking Strategy complementing Low Traffic Neighbourhoods and School Streets will be delivered as part of the joint commissioning of the Sustainable Transport Strategy, which will provide mapping of routes and may inform further amendments to policies post Reg. 18.

Support for technological advancements and innovative tools and materials is noted. The Design policies and the guidance available to support them provide a framework that can be used alongside modern methods of construction to create quality places in Newham.

Q3. Is there anything missing?

- 4 residents said that nothing is missing and 1 resident said that something is missing but it is a start
- 3 residents mentioned more is needed on retrofitting, environmentally-friendly design, and giving equal importance to all areas

Officer Response:

Retrofitting support and environmental standards are set out in the policies of the Climate Emergency chapter. The Design policies D8 to D10 address the need to protect and enhance Newham's historic environments and buildings. Both design and environmental considerations apply equally to all developments. The Local Plan policies work together across themes to support quality, healthy, environmentally-friendly development that fulfils the needs of residents and supports a strong local economy.

The Public Realm Net Gain policy D2 seeks to extend investment beyond the boundaries of sites in order to help address the quality and maintenance of the public realm more broadly.

Q4. Are you familiar with any other building industry standards that we could consider?

- 3 residents said that we should consider environmentally-friendly standards such as the German Sustainable Building Council, 1 resident highlighted the need to consider street lighting, 2 residents and developers said to consider the Healthy Streets Frameworks and building industry standards, and 1 resident and the Mayor of London recommended standards Secured by Design
- The NHS Urban Development Unit suggested considering the Dept for Health and Social Care's Health Building Notes and also supported a consistent approach through guidance on healthy places
- 1 resident said that outcomes should be monitored
- 14 comments said they could not answer the question, either because it is too inaccessible for a resident to answer, or because they are not familiar with the concept, yet they advised to learn from other Councils and prevent using flammable materials such as the cladding in Grenfell

Officer Response:

Environmental standards are set out in the policies of the Climate Emergency chapter.

The Healthy Streets Framework sits as a baseline for many of the design policies, and particularly Policy D2 Public Realm Net Gain.

Criteria for the design of places that feel safe and that are secure are covered under policies D1, D2, D6 and D7, including the role of quality lighting. Secured by Design standards are supported in relation to security features where they are required, such as in relation to building entrances and windows, as part of a balanced approach that creates quality, interesting public realm while designing in safety.

The Building for a Healthy Life (2021) standards has informed Policy D1 Design Standards.

The Department for Health and Social Care's Health Building Notes is considered too focused on the design of healthcare facilities. However, the policies of the plan would not impede application of these design standards on appropriate schemes.

Quality of materials is covered broadly by Policy D1. Specific safety aspects of materials are addressed under Building Regulations and other legislation. London Plan Policy D12 addresses fire safety and there is currently no evidence to suggest that a Newham-specific approach is required.

In relation to monitoring, see response to Q1.

Q5. Should there be an expectation of Public Realm Net Gain for major applications, and if so what should be the focus?

- 4 residents, University of East London, Mayor of London, LB Redbridge, Lea Valley Regional Park Authority, and residents support a Public Realm Management Plan in order to address both quantitative and functional gains for new developments, improve maintenance processes and quality of spaces and habitats such as Westfields, and align with the Public London Charter principles
- Developers brought up methodology considerations against a Public Realm Management Plan, such as:
 - Needing to take into account site constraints and other policy requirements
 - Needing to provide further detail
 - Considering it qualitatively not quantitatively
 - Having a network of public realm spaces instead
 - Questioning the appropriateness on small sites
- 7 comments support the concept of Public Realm Net Gain, and 27 comments provided considerations to put forward, such as keeping developers more accountable, aiding to achieve the Urban Greening Factor and overall climate resilience, as well as community hubs and micro-hubs, carbon-neutral homes, better accessibility and inclusion, health and wellbeing, convivial spaces with active frontages, family-sized housing, play spaces, markets, and conservation
- Developers mentioned concerns about the Public Realm Net Gain, including:
 - That it wouldn't ensure high-quality design, safety or function alone
 - That it wouldn't consider site constraints and policy requirements
 - How would it be quantified; it should be considered qualitatively and not on a target-based requirement
 - Not viable to apply it to industrial uses due to safety and security considerations
- 2 residents said that enforcement and monitoring of delivery needs to be implemented
- 1 resident does not support tall buildings as part of the public realm
- Get Living Plc mentioned East Village as a good example to learn from with regard to public realm

Officer Response:

The broad support and the suggestions and examples are welcomed and have helped formulate the approach to Public Realm Net Gain of policy D2.

Public realm has been defined in relation to outdoor spaces and therefore does not address building design or uses within building that are broadly open to the public. Nevertheless, it is well understood that from a place-making perspective public realm cannot be considered in isolation from the buildings and private spaces it connect to. The policy therefore works alongside other policies, particularly D1 (Design Standards) and D6 (Shopfronts and Advertising), and High Streets, Transport and Greenspace policies, to deliver its objectives in the round.

The draft policy takes a non-prescriptive approach to quantitative gains beyond requirements identified in site allocations, instead focusing on quality and processes to help ensure that the broader network of public realm in Newham is enhanced.

Q6. What would you like to help co-design in your neighbourhood?

- 32 comments, both from residents, developers, the NHS Development Planning Unit, LBN Public Health, and Mayor of London, support the notion of co-design generally, mentioning community design forums and focus on groups with whom engagement has typically failed, in topics such as greenspaces, community facilities, pubs, public realm, and cycling infrastructure
- The Mayor of London said the co-design proposal aligns with the London Plan's Objective GG1
- Residents, the NHS Development Planning Unit, and LB Redbridge specifically supported youth-led design and the youth design review panel, in ways such as creating links with schools, but some developers do not support it
- LBN Public Health, developers, and residents welcome the concept of co-design and using existing community networks for it
- 2 residents said that in order for co-design to be successful, the Council needs to build on existing community links, such as the voluntary and faith sector

Officer Response:

The suggestions and comments are welcomed and have helped formulate the approach to co-designed masterplanning of policy BFN2. See also response to Q2 on 'Our Plan' section of this report.

Policies D1 (Design Standards) and D4 (Tall Buildings) support the role that a community review panel could play in auditing the quality of developments in the borough – alongside the specialist Newham Design Review Panel – as and when such a panel may be established (including the option for a youth review panel).

Q7. How has the pandemic affected how you use your home and your perception of the quality of the space you have available?

- 10 comments mentioned that the pandemic helped appreciate greenspaces and community facilities better, and 2 residents specifically mentioned how valuable a garden has been
- 5 residents said their houses do not have enough space, especially when working from home
- 2 residents said that the tall buildings around their house affected their access to daylight and cause light pollution
- 1 resident said their neighbourhood has deteriorated since the pandemic and 1 other resident said they had little access to outside facilities
- 2 residents mentioned the loss of opportunities and spaces for children

Officer Response:

We note the comments made.

The issues are addressed through the whole Local Plan:

- Policy H11 sets new housing standards that address the need for internal layout flexibility in homes, and the need for additional communal space to complement the changes to how we use our homes such as the need for workspace.

- The Green and Water Space chapter, alongside policy D2 (Public Realm Net Gain) and site allocations seek to protect existing and deliver new green and open spaces in the borough.
- The Community Facilities chapter seeks to protect existing and promote new community uses, including opportunities for children and young people.
- Policy D7 addresses neighbourliness issues, including standards of access to daylight and sunlight.

Other themes:

- 15 comments, including those from developers, NHS Development Planning Unit, LB Redbridge, Environment Agency, TfL, and Historic England, were about guidance, both in support of the National Design Guide, the Characterisation Study, the SSA design guidance, the London Plan, and the NPPF
- 20 comments, including those from Sport England, Marine Management Organisation, and Historic England, mentioned heritage, including the need to address Risk Register, addressing the importance and maintenance of cultural heritage such as local views and statues, and the need to involve key stakeholders and monitor its delivery
- 4 comments, including 1 from the Royal Docks Engagement team, mentioned the 15 minute neighbourhood, and how it needs to promote safety and comfort and address existing barriers to pedestrians
- 26 comments were about principles supported by stakeholders, some of which included culture and art in the public realm and diversity of design
- 1 resident voiced concern over communities not being listened to and 2 residents also said that a sense of ownership is necessary for the community

Officer Response:

We note the comments received.

References to guidance documents have been added through the Design policies, including those that support the NPPF and London Plan, as well as more specific local guidance where available.

Support for the quality place-making role of arts and culture is included in Policy D2 Public Realm Net Gain as well as the approach to policies in High Streets and Community Facilities chapters of the Plan.

Policies D8 Conservation Areas and Areas of Townscape Value, D9 Archaeological Priority Areas and D10 Designated and Non-Designated Heritage Assets, Ancient Monuments and Historic Parks and Gardens address all aspects of protection and enhancement of heritage assets, including the need to address the 'at Risk' register. Further, High Street Policy D3 offers flexibilities to the national 'Town Centre First' approach to allow heritage assets to continue to offer a visitor-focused use when integral to its significance and future viability.

In relation to the 15 minute neighbourhood and the need to promote safety and address barriers to movement, these key principles are addressed in Policies D1 Design Standards and D2 Public Realm Net Gain. The Transport policies provide further support to improving connectivity and supporting walking and cycling in the borough.

Diversity of design is supported. The Design chapter offers standards and criteria that form the basics of good design, but it is not prescriptive in supporting any particular architectural style. Policy D3 Design-led Residential Site Capacity Optimisation provides opportunities for design diversity by requiring major developments to provide different dwelling types distributed across and within buildings. Policy D5 Living Well at High Density further requires that high density development is complemented by diversity of activities and spaces in the public realm.

Creation of a sense of ownership is promoted in Policies D1 Design Standards and D2 Public Realm Net Gain, as a key consideration of good place-making. The Characterisation Study's Borough-Wide Design Principles include further guidance on how this can be promoted by development.

In relation to community engagement in design processes, see response to Q6.

Below are the responses provided in the un-facilitated and facilitated workshops.

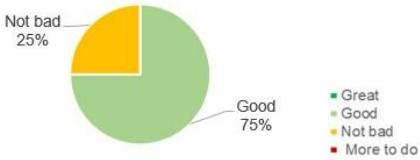
OUR DESIGN



Discussion Summary

- The workshop group brought a range of experiences and ideas to the discussion, that supported an interesting discussion. There was a strong understanding in the group of how design impacted people's relationships to the places and spaces around them.
- There was broad support for the proposals outlined but the Planning Policy Team, with the discussion **focusing on how the proposals can be delivered** e.g. co-design of major developments. What we mean when we say 'co-design' was also a helpful challenge from the group.
- proposal 6 mentions diversity and heritage and the use of language became a key theme of the discussion. What do we mean by diversity? Does protecting our heritage mean limiting our innovation? There was broad consensus in the group that **the local plan needed to reflect the uniqueness of Newham, including both the built environment and the people who live and work in the borough.**
- The second part of the discussion focused on what good would look for the proposals on **child-friendly spaces and design that reflects Newham/s heritage, diversity, and ability to innovate.** One of the key areas of agreement was that **spaces shouldn't be too narrowly defined** for one group or community. **Good design means creating spaces and places that work for a wide range of people with different needs and aspirations.** For example, child-friendly spaces shouldn't be too targeted to one group. We don't want everything to look like the school playground, as this may limit who feels the space is for them and who will engage with it. **People of all ages and backgrounds help to shape the spaces around them and supporting people to co-design these spaces is vital.** This includes the initial design phase but also how spaces and places continue to be used after they are built.
- One of the final areas of discussion focused on **how the public realm is developed in every phase and ensure it is delivered.** Can we incentivise local businesses and community groups to use ground floor spaces? How do we ensure that plans for the public realm are not watered down between planning and delivery? The conversation came back to co-design **and the need to have the community involved at all stages of development, as a way of ensuring that the needs of Newham's communities are met.**

From the information you have had so far, how do you feel about the proposals?



Feedback	Percentage
Good	75%
Not bad	25%

Proposals discussed

1. Promote public realm and other spaces that enable positive social interaction and cultural representation	4. Promote the co-design of key elements of major developments
2. Develop a public realm network of child-friendly spaces and routes	5. Create a Young People Design Review Panel
3. Require application of recognised high industry standards of design and sustainability	6. Provide Newham-specific design guidance that reflects Newham's diversity and heritage

WE ARE NEWHAM.

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People at the Heart of Everything We Do

Workshop Theme	Jamboard Summary
Design 20 th Nov	• Need for more accessible spaces ○ Need to be child-friendly ○ Spaces need to be fit for purpose ○ Everyone needs to feel comfortable in such spaces ▪ i.e. Courtyards and easy navigation ○ Need spaces for young people with SEND ○ Need a network of space for all ages • Design needs to encourage a healthy work-life balance ○ Parks and play grounds are only busy in the weekend ○ Design influences people's behaviour and wellbeing ○ Need more natural daylight ○ Need to address issues with cladding • Need to promote youth engagement in design ○ Needs of children need to be considered ○ Need to inspire children for the future ○ Empower young people to think about their surrounding spaces • Design needs to reflect heritage ○ Regeneration needs to reflect history (past, present, future) ○ RD need to highlight its industrial heritage and Afro-Caribbean heritage ○ Need to promote interaction with water in RD • Promotion of public art to reflect diversity of borough • Loss of community space ○ I.e. Durning Hall in Forest Gate ○ Stratford Circus ○ Atherton Leisure Centre
Design 29 th Nov	• Design needs to reflect heritage ○ Need to respectfully accommodate local cultural design ○ Need a purpose-built mosque ▪ i.e. CS of mosque in Oxford that has won award / Pumping Station in Abbey Mills ○ Need to reflect unique qualities of Newham and showcase them ○ Reflect historical water side features ○ Newham needs to have its own definition of beauty to guide proposals

	• Need to promote youth engagement in design and prioritise children when regenerating ○ Young people involvement in Design Review Panel ○ Creation of Young People Panel ○ Allow children to feel sense of place via water-side ○ Prioritise space for children ▪ i.e. Queen's Market should have a space for children • Need Co-Design ○ Through stages ○ Strike balance between sustainability and viability when delivering affordable housing ○ Opinions of young and elderly people should be considered ○ Make it easier for residents to get involved and get more information out • Need more enforcement ○ Ensure developers comply with planning obligations
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Officer Response:

For a response related to comments on co-design and youth engagement, please see answer in Q6.

Inclusivity and accessibility in public spaces is addressed through policies D2 (Public Realm Net Gain), but also D6 (Shopfronts and Advertising). Inclusivity and accessibility matters are also addressed under other chapters' policies when related to specific uses. For example, accessible visitor accommodation and the need for public accessible toilets are addressed in the High Streets chapter.

The need for design to respond to a wide range of people with different needs and aspirations forms part of the requirement of policy D2 (Public Realm Net Gain), D3 (Design-led Residential Site Capacity Optimisation) and D5 (Living Well at High Density). The requirement for public spaces to be managed in line with the Public London Charter is also expected to help better integrate varied activities into spaces at different times of the day, and where appropriate into the evening, so that they are multi-functional and are better able to respond to a range of local needs. Similarly, policies HS2 (Managing New and Existing Town and Local Centres) and HS5 (Visitor Evening and Night Time Economy) of the High Streets chapter address the aspiration to activate the public realm environment in Newham's Town and Local Centres, including opportunities for outdoor eating, rest or play.

The protection of heritage and the need for design to be responsive to local culture and character are addressed by policies D1 (Design Standards) and the heritage policies D8, D9 and D10. These are supported by the extensive assessment of local character, and related design guidance, set out in the Characterisation Study. Often innovation can be discretely integrated into historic townscapes, and

heritage protection and innovation are not mutually exclusive. Design diversity and innovation are supported. Please see also response under 'other comments' section.

Activation of water spaces is addressed in the Green and Water Spaces chapter.

In relation to community spaces and local cultural assets, please refer to the Community Facilities section. Art and cultural representation in the public realm are supported by Policy D2 Public Realm Net Gain.

Access to daylight and sunlight is addressed as part of neighbourliness consideration of Policy D7.

The need to address public realm delivery as part of overall scheme phasing is secured through the legal agreement requirements of Policy D2 Public Realm Net Gain.

Cladding issues are addressed by London Plan Policy D Fire Safety.

Enforcement and monitoring concerns are also noted. Please see response to Q1.

5.4 High Streets

This theme seeks to address the future of Newham's High Streets, including shopping parades, Town and Local Centres, retail parks, and markets.

The proposed policy changed include:



This theme received 373 comments from 103 representors.



Q1. Do you agree with the proposed changes?

- 21 comments from residents support the proposed changes for High Streets
- 5 comments from developers, residents, TfL, and NHS Urban Development Unit specifically support the 15 minute neighbourhood proposal, including the importance of local services
- 1 resident said they support having a separate policy for each Town Centre to allow for diverse and distinct approaches
- 4 comments, from residents, Monega Association, and TfL, support the diversity of offer, suggesting the need for more independent shops, pubs, and restaurants, and the facilitation of changes of use
- 7 residents, Climate You Change, LBN Public Health, Friends of Queens Market, and developers support improvements to the public realm as places for social interaction and community development, that need to be more attractive, need better digital connectivity and activation, and more alfresco spaces and street markets, signaling Meridian Square as an example of bad public realm and Silvertown Quays as an example that will embed good principles
- 1 resident, the Mayor of London, developers, and LB Waltham Forest support taking a proactive approach toward enabling and managing the evening and night time economy, as well as the approach to managing cumulative impacts that lead to unhealthy environments such as shisha rooms
- 5 comments partially support the proposed changes, some claiming it could go further, others worried about the housing provision and community facility balance, and one comment saying the proposals are too negative
- 3 comments do not support the proposed changes, 1 comment was unclear about the policy, and developers said to be careful in being too prescriptive

Officer Response:

We welcome the broad support for the proposed changes, as well as the challenges that some respondents noted.

The 15 minute neighbourhood concept has been imbedded into the approach to developing policies for a more diverse and inclusive Town Centre Network, including new designations and revisions to some existing designations in line with the Retail and Leisure Study recommendations. Draft Policy HS1 includes the aspiration that every household should have a choice of at least two designated Town Centre Network destinations within a 15min walk, recognising that 29% of residents walk for their main food shopping and currently less than 1% cycle. The topic paper(s) for revised and new designations for Town Centres, Local Centres and Neighbourhood Parades further address the 15 minute neighbourhood concept and aspirations of this Plan alongside the evidence base, to provide the framework used to arrive at the proposed changes to the Newham Town Centre Network. The other draft policies of the chapter address specific aspects of the Town Centres Network that together work to promote a network of characterful, successful, healthy and viable hubs of commercial and community activity in each neighbourhood.

The Neighbourhoods policies now include further detail on the aspirations for growth for each Town Centre, and a number of the larger local centres where targeted regeneration and development activity is expected.

The High Streets chapter policies flexibly address a wide range of trends and demands that affect retail, services and leisure markets, in line with the evidence of the Retail and Leisure Study recommendations and the requirements of the NPPF and London Plan. The need to diversify uses and promote more leisure uses specifically, in addition to retaining a robust retail core, remain key objectives (see policies HS2, HS4 and HS5), and are supported by the evidence base.

In support of independent businesses, and recognising affordability considerations as a key driver of consumer choices, proposed policy HS2:

- Will require schemes over 1000sqm GIA to provide smaller units at affordable rents.
- Will support innovative shared use of buildings in certain conditions.
- Will promote meanwhile use of vacant units through promotion of flexible, affordable short-term leases as part of a Meanwhile Use Strategy.

This approach will support small businesses on Newham's High Streets, and is expected to also result in a more diverse range of affordable products and services being available to visitors.

Draft Policy HS2 Managing New and Existing Town and Local Centres, Parts 9 and 10 address the need for provision of quality, accessible and activated public realm, and public amenities such as drinking water fountains, toilets and baby changing/nursing facilities, and digital connectivity. Alongside the quality criteria of Policy D2 Public Realm Net Gain and Policy HS5 Visitor Evening and Night Time Economy, and centre-specific policy and allocations in the Neighbourhoods chapter, the Plan promotes a range of measures to improve access, safety and quality of public realm offer in Newham's Town and Local Centres.

Draft Policy HS4 recognises the important role that markets and pop-up activities can have on creating attractive, vibrant Town and Local Centres. It protects existing markets and encourages further new provision. In addition, Draft Policy HS5 Visitor Evening and Night Time Economy recognises the important leisure offer that markets can offer throughout the day and into the evening.

Draft Policy HS5 seeks to direct growth in the visitor evening and night time economy (ENTE) through a range of strategic measures, including:

- Identifying existing and new Town Centre locations where clusters of ENTE activity are encouraged, designating them as ENTE Zones, alongside measure to limit impacts and prevalence elsewhere in the borough.
- Identifying and supporting the uses that are of most value to creating a thriving visitor evening and night time economy, in line with comments received from residents at Issues and Options consultation.
- Requiring that ENTE uses be well managed through a Management Plan and encouraging partnership working on safety and accessibility across the Town Centre.

Draft Policy HS6 Health and Wellbeing on the High Streets builds on the success of existing cumulative impact policies. The proposed policy is strengthened. It now addresses all types of

gambling premises - betting shops, adult amusement arcades and casinos. Clustering criteria relating to prevalence of hot food takeaways and gambling premises borough-wide and within Town and Local Centres are clarified, and address concerns raised in consultation responses about their disproportionate impact on the leisure offer of centres, including Local Centres. Further new quality criteria is proposed to manage qualitative impacts of these uses where they are deemed otherwise acceptable. Draft Policy HS6 Health and Wellbeing on the High Streets now also addresses qualitative criteria for the management of pawnbrokers, pay day loan shops and other similar financial services uses. In order to support the creation of healthy food environments, the policy also encourages all units selling or serving food to sign up to recognised industry standards that promote healthier behaviours. Management of waterpipe smoking (shisha) and other uses where smoking is part of the amenity impacts will be achieved through application of Policy BFN3 Social Value and Health Impact Assessment - Delivering Social Value, Health and Wellbeing and policy D7 Neighbourliness, recognising the wider legal framework affecting these types of activities.

Community facilities are addressed in the Community Facilities chapter in detail. Draft Policies HS2 and HS5 support the role that community facilities, particularly the role leisure and cultural uses can play in diversifying the offer of Town and Local Centres.

The three comments received that disagree with the proposed direction of policy are noted, but are not supported by further comments that can be addressed.

Q2. Are there other changes we should consider?

- 3 residents said there is nothing else to consider, whilst 2 residents said there are missing elements, such as talking to local community forums
- 18 comments, from residents, LBN Public Health, the NHS Urban Development Unit, and developers, supported managing cumulative impacts, including adding further uses to it and increasing targets, monitoring for evidence, support for restricting dark kitchens, and overall concerns about there being too many betting shops
- 2 Developers said that dark kitchens are an evolving business model and should be considered on their own merits rather than be restricted. One also said they do not support expanding cumulative impacts into Local Centres
- 10 comments, from residents, Mayor of London, Friends of Queens Market, and TfL, were about the public realm, proposing to consider fewer cars parked on streets, more greenspaces and trees, more safety, more accessibility for improved mobility, more cleanliness, and support for street markets
- 6 comments from developers, residents, LBN Public Health, NHS Urban Development Unit, Historic England, and a local business owner, were about quality of offer, specifically the importance of considering businesses connected to the local community such as community pharmacies, promoting health and wellbeing through establishing healthier public environments, protecting heritage, and using Hackney's approach to support non-chain businesses
- 10 residents said to consider shopfronts, including support for a design guidance and their refurbishment
- 19 comments from residents, Mayor of London, Get Living Plc, LBN Public Health, TfL, and Fossil Free Newham were about supporting diversity of offer, including a diversity of uses on the high street and in large schemes, support for leisure facilities and a wider range of retail such as pubs, restaurants, cinemas, and vegan shops, and care to not promote car usage through click and collect facilities nor HGVs going through High Streets
- 10 comments from residents, developers, LBN Public Health, and Stephen Timms MP support the 15 minute neighbourhood and how it could achieve to provide a wider range of accessible services, such as healthy eating options and culturally-appropriate eating options as per the Good Food Plan, as well as play spaces and access to mental health support facilities
- Monega Association said that the 15 minute concept has unintended consequences given its problematic definition and that a 15 minute cycle journey should not be considered acceptable
- Get Living Plc highlighted East Village and its Lab E20 as an exemplar example of a 15 minute neighbourhood and Wanstead high street was mentioned as a good example of independent and affordable retailers
- Developers, the Mayor of London, Stephen Timms MP, and Monega Association said that implementing the 15 minute neighbourhood would allow for the opportunity to review boundaries, but that areas should only be designated as Local Centres if they can be accessed by public transport or active travel
- The Mayor of London recommended considering Policy T7 Delivery, Servicing, and Construction guidance
- 8 comments from developers mentioned technical requirements, including the distribution of uses across the borough, the support for meanwhile uses but not on all vacant sites, excluding Use Class E(g)iii from sequential and impact testing, raising the threshold for sequential testing, and using the Retail Study findings to determine the threshold for each centre

Officer Response:

We welcome the broad support for the policy direction and the additional information that has helped formulate the draft policies. We also note the range of views expressed, including those in disagreement.

Community co-design is a key objective of the Plan and is addressed in Building a Fairer Newham chapter, policy BFR2. Most policies in the High Streets chapter further seek to promote local business partnerships as part of the management of Newham's Town and Local Centres, for example as part of Management Plans for markets (Draft Policy HS4), Meanwhile Use Strategies for larger sites (Draft Policy HS2), and the co-management of safety at night through signing up to local safety frameworks (Draft Policy HS5) and provision of facilities for night time workers (Draft Policies HS5 and HS7).

For the proposed approach to managing cumulative impacts and promoting a healthy food environment (Draft Policy HS6), see response to Q1. The majority of respondents, and particularly residents and public sector agencies, are in support of the aspiration to widen and tighten control of uses. We also note resident concerns with lack of diversity of services or goods offered by units operating in the same use class, particularly shops and restaurants. However, business models are not a matter that planning can control. Planning policy can promote or restrict broad uses (Use Class) and support take-up of any recognised qualitative industry standards, such as healthy food promotion standards (see Policy HS6).

For the approach to public realm in Town and Local Centres (Draft Policy HS2), and to markets (Draft Policy HS4), see response to Q1.

Dark kitchens are addressed under new Draft Policy HS7 Delivery-led Businesses. The policy takes a positive approach to this new type of business model, helping direct it to suitable areas close to residential neighbourhoods but where their particular impacts, including more inactive frontages and frequency of deliveries, can be best managed. Dark Kitchens are also expected to promote a safe working environment for their delivery partners, promote sustainable travel, and support a healthy food environment in line with policy HS6.

Micro-fulfilment centres are also addressed in Draft Policy HS7 Delivery-led Businesses, and in line with the guidance set by London Plan Policy T7 Delivery, Servicing, and Construction, are directed to employment designations (Employment chapter) as well as suitable locations on High Streets or in retail parks.

The local Impact Testing threshold remains at 300sqm, as recommended by the Retail and Leisure Study, in order to help promote and protect the role of Local Centres as significant contributors to Newham's Town Centre Network. In line with NPPF and the London Plan, the threshold applies to out of centre and edge of centre retail, leisure and office uses. Policy HS3 Edge-of-Centre and Out-of-Centre Retail, Restaurants, Cafés and Services clarifies the intended implementation of the Impact Test in relation to retail (Ea), and restaurants and cafés (Eb). The Economy and Community Facilities chapters address the Impact Test requirements for offices (Eg.i), and other leisure uses respectively.

Publicly accessible play space and provision of street trees are addressed in policies D2 Public Realm Net Gain, GWS5 Play and Informal Recreation for All Ages and GWS4. Trees. The delivery of play and greening as part of the public realm offer of town and Local Centres is supported by Policy HS2 Managing New and Existing Town and Local Centres, Part 10.

The Transport chapter addresses parking provision broadly and seeks to encourage behavioural change towards more trips being undertaken by walking, cycling and public transport, in line with the NPPF and London Plan.

Q3. Is there anything missing?

- 2 residents said nothing is missing
- 3 residents said that consideration for travelling between neighbourhoods, quality of offer, work spaces, and viability for local businesses in relation to 15 minute neighbourhoods are missing
- LB Redbridge said there is not enough about the proposed level of growth for Stratford Town Centre
- 1 resident said that prevention of fast food from dominating the high street is missing
- 2 residents mentioned there needs to be more public realm improvements, including widened pavements for restaurants and cafés to use, and more style and vibrancy
- The Mayor of London asked for clarification on how LB Newham will undergo market testing, and recommended using Policy SD7 C7 with regard to temporary meanwhile uses
- 2 residents said that the Council should increase support for minority-owned businesses, such as artist studio
- LBN Public Health said that the proposal to promote health and wellbeing on the High Street needs to be better connected to affordable workspaces and accessible and inclusive spaces to rest, play, and socialise
- Stephen Timms MP said that the Local Plan fails to understand the importance of Katherine Road

Officer Response:

The importance of improving access to the Town Centre Network is a key strategic consideration that is addressed by the Transport chapter, and at a more local level, in the Neighbourhoods chapter.

Workspace is addressed in the Employment chapter and includes consideration of access within 15 minute neighbourhoods as well as affordability.

Quality of the offer on Newham's High Streets is addressed from a uses mix perspective by the policies of the High Streets chapter (see answers to Q1). From a design perspective, improving the look and feel and offer of Newham's High Streets is addressed by the policies of the Design chapter, particularly D1 Design Standards, D2 Public Realm Net Gain and D6 Shopfronts and Advertising.

Cumulative impact criteria for the management of hot food takeaways in Town and Local Centres has been simplified to be clearer and easier to address (Draft Policy HS6), and the policy has overall been tightened and expanded. See further details in answer to Q1.

Meanwhile uses are supported as a way of activating Town Centre frontages in a range of ways, including through the Meanwhile Use Strategy requirement of policy HS2 Managing New and Existing Town and Local Centres Part 7, which is in line with London Plan policy SD7 Part C7, as well as broader support for pop-ups, markets and other innovative short-lease business models in policy HS4 Markets, and Events/Pop-Up Spaces. The proposed requirement for a marketing strategy is addressed by policy HS2 Part 8, and works alongside the Meanwhile Use Strategy to help manage the long-term success of larger scale schemes in Newham's centres.

Ethnic ownership of businesses, and general business interests, are not material planning considerations. Nevertheless, the High Streets and Employment chapters seek to provide a mix of types of floorspace suitable for a range of businesses, and proposals include criteria to secure affordability of units in certain cases (See response to Q1). Positive Local Plan economic policies can be supplemented by Economic Regeneration initiatives to help support a range of entrepreneurs.

The policies of the High Streets chapter do not work in isolation from the other policies of the Plan and should be considered holistically. Broadly, the Plan seeks to balance and coordinate a range of needs, including health and wellbeing on the High Streets, provision of affordable workspaces, and accessible and inclusive spaces to rest, play, and socialise.

In line with 15 minute neighbourhoods aspirations (see answer to Q1), and the recommendations of the Retail and Leisure Study on addressing gaps in Newham's Town Centres Network, a range of new Local Centre and Shopping Parade designations have been proposed. This includes proposed new designations along Katherine Road.

Q4. What type of leisure and cultural activities would you like to see expanded into the evening and night time? What do you think are the essential elements for this to be managed successfully in terms of access, amenity impacts (e.g. noise, privacy) and health and safety?

- 24 comments mentioned that they would like to see a more varied range of uses for the night time economy, including:
 - afternoon and early evening activities/restaurants that are family-friendly
 - indoor spaces for community uses, such as choir and theatre groups
 - music, gig venues
 - open air theatres/theatres
 - diversifying and encouraging leisure and cultural uses in appropriate locations
 - learning zones
 - eateries
 - exhibition spaces (both indoors and outdoors)/art galleries/cultural centres
 - independent pubs and bars
 - youth clubs
 - gyms
 - cinemas
 - comedy spaces
 - games spaces
 - night markets
 - cafés
 - charity shops/bookshops/clothes shops
- 2 residents said noise, privacy, and safety need to be managed under the night time economy
- 1 resident raised concerns over the loss of cultural and leisure spaces/activities
- 1 resident mentioned the food and music evenings at Forest Gate Market as a good example
- 1 resident said that the night time economy needs to be accessible from 40-120min away
- 2 residents say they don't take part in the night time economy and are sceptical about it causing anti-social behaviour, and 1 resident said they do not know

Officer Response:

The varied responses are welcomed and have helped formulate the approach to policy HS5 Visitor Evening and Night Time Economy (ENTE). With most shops able to operate into the evening without a licence, the focus of the policy is on promotion of quality leisure activities.

The policy addresses:

- The proposed distribution of evening and night time leisure uses, directing it firstly to Newham's Town Centres, in line with existing capacity and known regeneration initiatives related to the promotion of ENTE in Newham. This approach should also ensure that, subject to effective night time public transport investment, all residents should be able to access a designated ENTE Zone within 40min cycle of public transport travel time.

- Qualitative standards, including the need to work in partnership across Centres to promote safety.
- Amenity impacts management, in line with Policy D7 Neighbourliness.

Of the uses mentioned in comments, only the following are not main Town Centre uses and are as such not addressed by policy HS5. They are nevertheless supported and addressed by the Community Facilities chapter:

- indoor spaces for community uses, such as choir and theatre groups
- learning zones
- youth clubs

Q5. How far (considering travel mode and duration) do you usually travel for your shopping, leisure, education or to social events?

- 1 resident said 0-15 minutes
- 11 residents said 15-30 minutes
- 4 residents said 30-45 minutes
- 2 residents said 30-60 minutes
- 2 residents said 2 miles
- 2 residents said 3 miles
- 4 residents said that they travel all across east London because there are not sufficient facilities in Newham
- 1 resident said they buy most things online

Officer Response:

The responses to this question have helped supplement the surveys' findings undertaken as part of the Characterisation Study and Retail and Leisure Study. Overall, the fact that many respondents travel further than 15 minutes to undertake day-to-day activities highlights the importance of key objectives in the High Streets chapter as supported by other policies of the Plan, not least helping deliver 15 minute neighbourhood aspirations:

- Protecting and creating a denser Town Centre Network (Policy HS1).
- Diversifying and improving the quality of offer in all Centres within the network (Policy HS2), including through managing cumulative impacts (Policy HS6) and promoting more leisure opportunities (Policies HS2 and HS5).
- Improving the accessibility to and within Town and Local Centres, such as improving public transport connections and removing pedestrian and cycle movement barriers (Transport and Neighbourhoods policies), and providing accessible public amenities in the centre (Policy HS2).
- Managing the growth of demand for online shopping (Policy HS7).

Q6. What is your local high street? What would you like to see more of in your local high street? Anything you would like to see less of in your local high street?

- 6 residents said **Forest Gate Town Centre**, wishing to see less duplication of similar services, more independent businesses stretching down to Upton Lane, a larger space for the market, a playground, outdoor seating, more trees, art, cleaner streets, more youth zones and community facilities, and less betting shops
- 4 residents said **Green Street Town Centre** needs less traffic, needs an uplift, more greenery, and more diverse offer such as pub and bakeries
- 16 residents said **East Ham Town Centre** needs more restaurants and cafés because they have been replaced for housing, more shops, more community spaces, more trees and greenery, more sitting areas, better signage, more safety, less betting shops, more diversity of offer, and low traffic areas, yet it has reasonably priced food and is good for specialist shops
- 3 residents said **Canning Town Town Centre** needs more uses, including shops and markets such as Rathbone Market, but improvements can be seen with more restaurants and diverse supermarkets
- 2 residents said **Abbey Arms Local Centre** needs more shops, cafés, and work spaces, and that not much is said about it
- 9 residents said **Manor Park Local Centre** needs a successful high street, including better and more varied shops, more local facilities, a smaller gym, a cinema, a shopping mall, and that buildings on the high street need to be better used, but it has good transport
- 9 residents said **Stratford Town Centre** is nice but not Westfields, whilst others said Westfields provides a range of facilities, and that there needs to be better transport connections to Stratford centre
- 1 resident said that **Silvertown** doesn't have a high street, and developers said Silvertown Quays needs a high street that delivers demand for online shopping
- 1 resident said that **North Woolwich Local Centre** has no high street
- 6 residents said **Custom House** needs better retail, restaurants, cafés, bars, leisure areas, and also needs better night-life options, and later opening hours
- 4 residents said **Beckton** needs more clothes shops, greenspaces, cafés, restaurants, a mainstream bank branch, and Alpine Way and Asda as local shops
- 8 residents said the **Royal Docks** need more independent shops and restaurants, as well as a high street, but it has great artist studios
- 2 residents support **Gallions Reach Shopping Centre**

Officer Response:

The responses received for these questions have helped shape centre-specific policies, which can be found in the Neighbourhoods chapter of the plan, including centre-based strategic sites.

The approach to supporting community facilities is set out in the Community Facilities chapter.

For the approach to managing cumulative impacts (policy HS6), promoting quality evening and night time economy (policy HS5), and improving the offer of existing centres (HS2), see response to Q1.

Below are the responses provided in the un-facilitated and facilitated workshops.

OUR HIGH STREETS



Discussion Summary

- The workshop group brought together people with a range of experiences and insights about high streets and town centres in Newham. This made for an interesting and wide-ranging discussion.
- There was broad support for the proposals outlined but the Planning Policy Team. The conversation initially focused on 15-minute neighbourhoods and what this means for Newham. There was agreement in the group that **Newham has quite good 15-minute neighbourhoods, with a lot of the shops, amenities etc. that people need.** There was a sense that what was sometimes missing were cultural activities and better quality restaurants. This meant **people often travelled into central London rather than to other parts of Newham.** It was felt that more could be done to support town centres to improve the night-time economy.
- How we use our high streets was also a key theme. The idea that they are for more than shopping was a key part of this discussion and people were already seeing these changes. This included more services being on the high street, such as care services. This potentially changes the look and feel of the high street and the group discussed ideas for **how the character of high streets could be protected if shop fronts were becoming less welcoming.** This included thinking about how we use the spaces on our high streets to create more opportunities for sitting down, either to rest or to be with friends. One idea was to think about **how services could potentially be moved to the first floor, to protect the character of high streets.**
- The group also felt more work needed to be done to also **ensure that high streets were clean and accessible.** Wheelchair users (and buggy users) would be impacted by increasing amounts of street furniture and more needed to be done to keep waste off the high streets.
- A range of interesting ideas for what a welcoming, inclusive, and innovative high street might look like was discussed. This included thinking about more **spaces/places for small traders** (e.g. someone who makes honey), places for people to access free Wi-Fi, how we discourage driving, and thinking about the **high streets can be a central focus of the 15-minute neighbourhoods approach.**

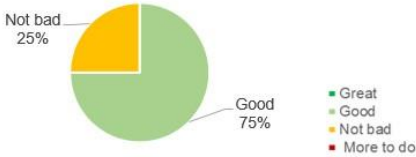
WE ARE NEWHAM.

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WE ARE NEWHAM.



From the information you have had so far, how do you feel about the proposals?



Proposals discussed

1. Facilitate 15 minute Neighbourhoods	4. Continue to manage cumulative impacts which create unhealthy environments and promote poor health
2. Take a proactive approach to enabling and managing the evening and night time economy	5. Clarify technical requirements - Require market testing and meanwhile use strategy
3. Managing the impacts of growth in online shopping	6. Remove duplication between town centre policies

People at the Heart of Everything We Do

Workshop Theme	Jamboard Summary
High Streets – 20 th November 2021	Community uses in Town Centres: • Rent may be restrictive in Town Centre locations. • May need to make better use of Council assets to support community groups
	Employment and affordable workspace • Offer opportunities for young people to access employment and training. • More affordable work space to support start-ups
	Town Centre character • Stratford is the big hub; everywhere else is more niche/specialist or local.

Officer Response:

We welcome the range of feedback and broad support for the high street policies expressed in the workshops.

Diversification of uses and particularly further support for leisure activities in Newham's Town and Local Centres form part of the key proposals in policy HS2 Managing New and Existing Town and Local Centres and policy HS5 Visitor Evening and Night Time Economy. See the response to Q1 for further details.

The 15 minute neighbourhood concept has helped shape the approach to the Newham Town Centre Network, with further sections of High Streets now proposed to be designated. This recognises the role that historic High Streets already play in expanding local access to goods and services, in line with the London Plan and NPPF. Further planned investment into Town and Local Centres, as set out in the Neighbourhoods policies, will help improve local offer and establish a local identity that promotes the vitality and viability of the centres. See response to Q1 for further details.

The importance of active frontages and an engaging quality and inclusive public realm offer are reflected in policy HS2 Managing New and Existing Town and Local Centres, and complemented by other policies of the plan such as D6 Shopfronts, Advertising and D2 Public Realm Net Gain and D7 Neighbourliness.

Provision of affordable small units for small and micro businesses is addressed in policy HS2 Part 6. Further, policies promote a positive approach to meanwhile uses and idea incubation as part of the high street offer in policy HS2 part 7 and Policy HS4 Markets and Events/Pop-Up Spaces.

The importance of the internet and digital connectivity to the future success of High Streets is also addressed through a requirement to improve publicly accessible digital connectivity as per of policy HS2 Managing New and Existing Town and Local Centres, and through new policy HS7 Delivery-led Businesses, which seeks to optimise the benefits of new goods and service provision models while managing its potential transport and amenity impacts.

The role of Stratford as the largest Centre in Newham is recognised through the plan, while policies encourage the creation of a local identity for each of Newham's centres, building on their individual physical, social and economic context. A range of regeneration initiatives are also specifically targeted at Newham's Town and Local Centres to help address any perceived investment imbalances compared to Stratford.

Employment access is considered in the Employment chapter, while provision of community facilities is addressed in the Community Facilities chapter. The importance of both uses as part of a varied offer in Newham's Centres is recognised and supported.

Q1. Do you agree with the proposed changes?

- 43 comments from residents, developers, LBN Public Health, TfL, LB Waltham Forest, Mayor of London, University of East London, NHS Urban Development Unit, and Stephen Timms MP, agreed with the proposed policy changes, especially in providing spaces for children and young people, making schools flexible spaces for the community, and addressing social integration, loneliness, and the Covid-19 recovery through community facilities
- 2 residents disagree with the proposed policy changes
- 11 comments from residents, developers, and the Monega Association agree with the proposals but consider that more needs to be done in terms of:
 - considering community facilities as local assets that should be protected
 - intensifying existing school sites
 - aligning with the London Plan's policy S6
 - elaborating further on the public toilets policy
 - supporting more flexibility on the Town Centre First approach
- Sport England, developers, and the Mayor of London support the implementation of the 15 minute neighbourhood, including the provision of sport and leisure facilities outside of town centres

Officer Response:

We recognise and welcome the broad support for the changes proposed to our approach to community facilities.

To inform the development of the revised policies on community facilities we have undertaken a Newham Community Facility Needs Assessment (2022). Policy CF3 Cultural and Leisure Facilities is being informed by [Building Newham's Creative Future \(2022\)](#), an updated Built Leisure Needs Assessment and a Playing Pitch Strategy (pending publication). Policy CF4 Education and Childcare Facilities has been informed by close working with colleagues in the Council's Education department. We have also worked with colleagues in Barts Health NHS Trust, NELFT and Health & Care Space Newham to understand the need for healthcare facilities over the Plan period.

The Council is committed to ensuring that we protect existing and support the delivery of new community facilities to ensure people living in Newham have access to the services they need. These aspirations are reflected in the emerging Local Plan, which proposes:

- A new policy structure – simplifying the approach to community facilities by having separate policies to focus on specific issues:
 - Policy CF1 Existing Community Facilities: Considers the proposed loss of a facility.
 - Policy CF2 New and Re-provided Community Facilities: Sets out how we will address proposals for new and re-provided facilities (including modernisation and/or expansion). The emerging policy provides more flexibility on the Town Centre First approach when compared to Policy INF8 in the current Local Plan (2018).
 - Policy CF3 Cultural and Leisure Facilities: Considers cultural and leisure facilities, including the approach to protection and encouragement of new provision.

- Policy CF4 Education and Childcare Facilities: Gives a clear steer on where education and childcare facilities are needed. The policy provides guidance on the design of new facilities and the need for school and higher education facilities to be available to the wider community outside of core hours.

As set out above, Policy CF4 in the emerging Local Plan includes the requirement for schools and higher education facilities to be available to the community outside of core hours. Beyond addressing the statutory requirement of Local Authorities to provide sufficient places, Policy CF4 sets out the importance of educational facilities as sites that promote community cohesion. Educational facilities are vital locations for communities to meet, acting as core 'hubs' that foster unity, diversity, and interactions amongst local residents. Evidence shows that only twenty schools out of the 100+ schools throughout the borough have been identified to have community-shared spaces (Community Facilities Needs Assessment, 2022). A more effective use of sites will be achieved by ensuring that educational facilities have a variety of community uses, and are positioned in accessible and central locations.

Policy S6 Public Toilets of the London Plan seeks to ensure that large scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets and free 'Changing Places' toilets. We recognise the need for good access to public toilets. Policy CF2.6.j requires proposals for all new and re-provided (including modernisation and/or expansion) community facilities to provide free, publically available and accessible toilets. The implementation text for this policy provides further guidance on what we would be looking for in planning proposals. Where appropriate, community facilities should also incorporate public toilets which make provision for those people with learning and physical disabilities and their carers. The following facilities are considered especially appropriate for this provision:

- Sport and leisure facilities
- Cultural centres, such as museums, concert halls and art galleries
- Town halls, civic centres and public libraries
- Education establishments
- Health facilities, such as hospitals, health centres and community practices

We welcome the support given to the proposal in the Issues and Options document which sought to reconsider the approach to the location of community facilities, with the possibility of introducing more flexibility and amending the Local Plan (2018) definition of 'main Town Centre uses'. The emerging Local Plan proposes to align with the definition of 'main Town Centre uses' found in both the NPPF and London Plan. We have also introduced greater flexibility to those community facilities which are not in Town Centres and fall beneath 1,000m² Gross Internal Area (GIA). It is important that community facilities are located in areas convenient for the communities they serve. This means that it may be acceptable for some smaller community facilities and those with a local user base to be located outside of a designated Town or Local Centre. In these cases, the users of the facility should be able to easily access the facility by foot or sustainable transport methods and it should be demonstrated that a search has been undertaken following the hierarchy set out in Policy CF2.2.b. Community facilities with wider

catchment areas (for example youth centres and larger places of worship) which can attract higher number of trips may create friction in residential areas due to increased traffic, noise and large numbers of people coming and going. Larger community facilities and those attracting users from beyond the local neighbourhood are therefore best located in Newham's Town or Local Centres.

Policy CF1 includes a number of [requirements](#) an Applicant needs to meet before the Council will permit the loss of a community facility, which includes the need for a Social Value Needs Assessment (see also Policy BFN3). An Asset of Community Value is land or a building nominated by a local voluntary or community group and which the Council decides meets the requirements to be listed as an Asset of Community Value. The statutory rules about Assets of Community Value can be found in sections 87-103 of the [Localism Act 2011](#) and in [The Assets of Community Value \(England\) Regulations 2012](#). The Council supports the process, but a specific clause in the Local Plan is not considered necessary to fulfil the requirements of the Act. More information on qualifying as an Asset of Community Value in Newham can be found here: <https://www.newham.gov.uk/council/community-right-bid/2>.

Q2. Are there other changes we should consider?

- 3 residents think there are no changes needed to the policy proposals
- 44 residents, LBN Public Health, Port of London Authority, Newham Councillors, One Newham, Sports England, Mayor of London, and developers said that certain aspects need to change, such as:
 - a clearer approach to assessing community facilities' need to avoid the loss of community facilities such as Durning Hall
 - a standalone policy for education to reflect the importance of such facilities and to ensure access by public transport and active travel, as well as road safety and lower pollution levels
 - Newham Sixth Form College suggested changes to the education policy, including the need to specify the balance between quality and quantity in floorspace, the need to address cross-funding, the specific requirements to support SEND, viability and funding challenges that require to build on surplus land, improvement of further education, support for the renewal of NewVic, and overall support for education facilities given their role in enhancing social integration
 - LBN Public Health said the education policy should consider walking to childcare facilities, ensuring there is sufficient supply and access to public transport, low levels of pollution and noise, planting of trees and plants, and extended opening hours
 - the Council and community to work together to deliver objectives and empower the community
 - better design of healthcare facilities, as per the Health & Care Space Newham
 - defining community facilities as per the London Plan's social infrastructure definition
 - re-assessing the funding of community facilities
 - better maintenance of facilities such as parks
 - additional and improved facilities including: childcare provision in co-working spaces and leisure centres, intergenerational spaces such as dance clubs for both children and older people, family-friendly leisure centres, longer opening hours for libraries and swimming pools, charities, volunteer-ran spaces such as Lordship Recreation Community Space, the re-instatement of Balaam Leisure Centre, the regeneration of pubs, and more community facilities overall
 - combining uses in town centres to maximise community facilities such as schools, so long as they are viable
 - providing a more flexible approach, including allowing changes of use from residential to community facilities
 - clearer guidance on community facility provision in site allocations
 - community facilities need to be provided or expanded/re-vitalised as housing numbers rise to ensure there is sufficient provision
 - community facilities need to promote cultural diversity and community spirit; their loss results in community fragmentation
 - 15 minute neighbourhoods need to consider family hubs, spaces that tackle loneliness, as well as allowing places of worship outside of town centres
 - LB Redbridge said the Plan should promote the co-location of community facilities in the form of 'community hubs'
 - The current Local Plan allows for too much loss of community facilities
 - A better consideration of water community facilities, as per the PLA's Thames Vision
- The NHS Urban Development Unit said that local health centres need to be more accessible and the policy should support new facilities as well as the improvement of existing facilities, that the integration of facilities should also be promoted, that the HUDU Planning Obligations Toolkit to calculate financial contributions as per the London Plan should be applied, and that facilities can be re-developed if they are identified as surplus
- Friends of Queen's Market said that the community value of Queen's Market needs to be better recognised
- 3 residents said that Newham City Farm should be protected and linked with education services as it provides educational outputs
- 1 resident said that the NPPF wording on community facilities is stronger than the Local Plan's wording
- Sport England said that weekday day and evening times should be prioritised for leisure and sport facilities, that the Plan should follow the NPPF and Sport England's Planning Policy, that the Playing Pitch and Indoor/Built Sport Facility Strategies should be updated to serve as evidence, and that they would be happy to liaise with the Council to help develop the plan
- Historic England said that pubs with historical and cultural value should be protected, as per the London Plan Policy HC7

Officer Response:

Officers welcome the suggestions to this chapter of the Local Plan – these have helped¹ to inform the development of policies on community facilities.

There is a clear desire for a simpler approach to assessing applications for community facilities. Officers agree that the existing Policy INF8 is long and intricate. We propose to have two separate policies, one on existing community facilities to address loss (CF1) and the other on new and enhanced community facilities (CF2). To support understanding of the policy we have provided implementation text.

As stated above, the Local Plan is proposing a standalone policy for education and childcare facilities (CF4).

Policy CF2 sets out important design criteria to think about when bringing forward a community facility. It has not gone into the specifics of individual types of service but officers agree that healthcare needs to be designed to meet the needs of those using and working in the facility. Indeed, CF2.6.b requires applicants to demonstrate that early consultation has been undertaken with the intended operator and users of the space. It requires community facilities to be co-designed, from the outset, in consultation with the existing and/or intended users and organisations

Officers agree that using the London Plans definition of ‘Social Infrastructure’ would provide greater synergy. The Local Plan is taking the same approach as the London Plan, though we refer to the term as ‘community facilities’. A table is provided in the introductory text to help guide Applicants on which policy is applicable to which type of facility. However, as with the London Plan, the list is not intended to be exhaustive and other uses can be included as community facilities.

Policy CF2 sets out that we may require development proposals for community facilities to enter into a Community Use Agreement, secured through a legal agreement with the Council. This is to make sure the space continues to meet the needs of its users. The maintenance of parks is addressed in the Green and Water Spaces chapter of the Local Plan. Policy GWS1.5 requires a Management Plan which demonstrates how the requirements of the Public London Charter principles will be met and implemented through a legal agreement.

Officers acknowledge the desire for additional and improved facilities. As set out above, we have undertaken an audit of existing community facilities in the Community Facilities Needs Assessment (2022) and are working on a Built and Leisure Needs Assessment and Playing Pitch Strategy. This evidence is informing our policy approach and helping Officers to understand where there are deficits in the provision of community facilities. We ask Applicants in the implementation text to the policies in this chapter to refer to these documents. For education and childcare facilities, Policy CF4 clearly sets out where new facilities are required across the Plan period, informed by the Council’s pupil forecast (Places for All, LBN (2022)), together with the annual [Childcare Sufficiency Assessment \(LBN \(2021\)\)](#).

We support combining uses in Town Centres to maximise the value and reach of community facilities, which is reflected in Policy C2 through encouraging co-location of services. Increasingly, complementary services which are managed by a variety of different providers, are being brought together in the same site or building. The co-location of services can bring together unordinary activities, which can facilitate social interaction between people who may not otherwise have met. It can also help to realise savings and efficiencies.

Officers acknowledge the need to take a more flexible approach to the location of community facilities. The policy response to this feedback has been addressed in the question above.

Site allocations now provide clearer language around the provision of community facilities. The Community Facilities Needs Assessment and the emerging Built Leisure Needs Assessment and Playing Pitch Strategy also provide updated evidence on the need for facilities over the Plan period.

We acknowledge the desire for more and revitalised community facilities. Policies in this chapter seek to protect the existing facilities in our neighbourhoods which are needed to support people living in the borough. They also support the delivery of new facilities in the right locations. As stated above, the evidence base we have been developing to inform this chapter of the Local Plan has helped to build an up-to-date picture of Newham's existing facilities and the need for future provision over the Local Plan period.

The importance of cultural diversity and community spirit existing in the borough is understood. The policies in this chapter recognise this, an example of this is Policy CF2 which requires all new and re-provided facilities to demonstrate that early consultation has been undertaken with the intended operator and users of the space. Community Facilities should be co-designed, from the outset, in consultation with the existing and/or intended users and organisations. Policy CF3 seeks to protect existing cultural and leisure facilities and support the provision of new facilities, helping to deliver the ambitions set out in Newham's Cultural Strategy [We Are Cultural \(2022\)](#).

Officers welcome the support expressed for 15 minute neighbourhoods and the importance of community facilities. In Newham, one in five people report feeling lonely often and 23,412 people live alone in Newham. We want to protect those facilities which can help combat loneliness. Faith groups, community halls, youth zones, sports clubs and other community facilities play an important role in creating stronger communities.

The co-location of community facilities is addressed above in the response to making best use of Town Centre sites.

Respondents express that the existing Local Plan (2018) allowed for too much loss of community facilities.

Community facilities that aim to improve the enjoyment of water spaces are addressed in the Green and Water Spaces chapter. The Interim Built Leisure Need Assessment has explored the need for water leisure facilities.

Officers agree that health centres should be in locations accessible to the communities they serve. This is reflected in the policy approach (CF2) which requires facilities to be located in accessible places and that the design of facilities be inclusive, accessible and visible and welcoming from the street.

With regard to the use of the HUDU model, the Local Plan introduces the need for a Social Value and Health Impact Assessment for any loss, gain or reconfiguration of a community facility (Policy BFN3). The Health Impact Assessment (HIA) element of the assessment helps to ensure that health and wellbeing are being properly considered in development proposals.

The community value of markets is recognised. The High Streets chapter in the Local Plan introduces Policy HS4 Markets, and Events/Pop-Up Spaces. Newham's markets actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the High Streets they are located in. The Town Centre health checks and Town Centre analysis of the Retail and Leisure Study demonstrates they are key attractors to Town Centres that are highly valued by local customers and those from further afield – Queens Market in Green Street in particular. The Council is currently developing an overarching strategy to support Newham's existing markets and create opportunities for new ones. This strategy will work alongside Policy HS4 to deliver high-quality markets.

The protection of Newham City Farm is addressed in the Green and Water Spaces chapter.

A desire for better access to leisure and sports facilities, with a focus on weekday and evening access has been expressed. As stated above, the Local Plan is being informed by a Built Leisure Needs Assessment. The Interim Built Leisure Need Assessment has explored the need for water leisure facilities. In line with the NPPF, it is important that alongside identifying specific needs and quantitative or qualitative deficits or surpluses of facilities, the assessment has also determined what provision is required to meet both current and future needs

We acknowledge the value of public houses – see the response to Q9 for further detail on the proposed policy approach.

We support working with the community to deliver community facility services. [Compost London](#) has been commissioned by the London Borough Newham to deliver infrastructure services to the voluntary community and faith sector in Newham. Policy CF2 requires community facilities to be co-designed from the outset, in consultation with the existing and/or intended users and organisations.

The funding of community facilities sits out of the control of planning policy but we have passed this information onto the team in the Council that provides funding for community organisations.

Q3. Is there anything missing?

- 3 residents said nothing is missing from the proposed policy changes
- 29 comments from residents, Climate You Change, One Newham, Stephen Timms MP, LBN Public Health, NHS Urban Development Unit, University of East London, and Mayor of London mentioned elements missing from the proposal, including:
 - External testing of policies
 - Embedding social value to S106 agreements, as per the North East London Anchor Charter
 - Ensuring better use of greenspaces
 - Push for more affordable, larger community spaces, both indoor and outdoor, especially for young people
 - Need for more integrated healthcare facilities that are closer to home to pollute less but also in town centres so they can expand, such as Akro Pharmacy
 - Better protection and enhancement of existing community facilities to avoid a loss like Balaam Leisure Centre, Durning Hall or Hartley Centre and to not detrimentally affect the less privileged residents that depend on such facilities
 - Community facilities to be entirely accessible
 - Not enough proposed new community facilities in Plan
 - No mention of places of worship
 - Better protection of public spaces and community facilities in private schemes so they do not change into residential
 - Policy should consider expropriating unused buildings to convert them into community facilities
 - A strategic approach to food banks
 - An updated Leisure Needs Assessments and Play Pitch Strategy
 - The local community, and especially young people, need to be consulted because they know what is needed
 - Need for more toilets, restaurants, pubs, cinemas, multi-use game areas, libraries with recycling points, music venues, theatres, and spaces to combat loneliness
- The Mayor of London agrees with embedding social value into the management of public spaces, in line with the London Plan
- Sport England said the Council should use their 'Designing for physical activity' guidance in order to promote physical activity in the borough to achieve the Towards a Better Newham strategy
- 1 resident said that the Council needs to spread awareness about the importance of protecting local heritage and community facilities
- 1 resident said that child provision is improving in East Ham South
- LBN Public Health said that the policy on pubs should rather be called 'places to eat and drink' so it is more encompassing
- Developers said community spaces for youth wellbeing and employment are needed

Officer Response:

Social Value will be embedded into new and re-provided community facilities. Any proposed loss, gain or reconfiguration is required to meet the requirements of Policy BFN3 Social Value Health Impact Assessment.

The desire to make better use of greenspaces is picked up in the response to the Green and Water Spaces chapter.

We recognise the need for affordable, larger community spaces and facilities to support young people. This feedback is reinforced in the Community Facilities Needs Assessment (2022). The policies in this chapter seek to protect existing and deliver new facilities where there is a deficit of provision.

Officers agree that healthcare facilities need to be accessible – a see the response to the previous question above regarding the policy response to this issue.

Policy CF1 is focused on the approach that should be taken when considering a development proposal for the loss of a community facility. The implementation text supporting this policy provides clear and detailed steps which an Applicant is required to follow to accept the loss of an existing facility (whether or not it is in active use). If the loss of a community facility can be demonstrated as being acceptable to the Council, then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location).

Officers agree that community facilities should be accessible. Policy CF2 requires facilities to be easily accessible by foot and sustainable transport methods for both staff and expected users of the facility.

Regarding the Issues and Options consultation document not considering places of worship fully, Officers would like to reassure that this was not our intention. The Community Facilities Needs Assessment (2022) has undertaken an audit of our existing places of worship to understand how they are distributed across the borough. Newham has the lowest percentage of residents in any London borough describing themselves as having no religion. 81% of residents describe themselves as having a religion, which is reflected by the 206 recorded place of worship. Participants who took part in the engagement which informed this study stated a large demand for additional religious meeting spaces within Beckton and Royal Docks, particularly the Muslim community who require space throughout the day for prayer.

Respondents expressed a need for better protection of public spaces and community facilities in private schemes so they do not change into residential uses at a later stage. Policy CF2 sets out that community facilities may be secured through a legal agreement with the Council, for the specific intended use of the facility. This is to ensure the long-term use of the facility remains for the users of the space.

Feedback on this chapter called for consideration on unused buildings for community uses. Policy CF2 supports bringing vacant sites or structures into temporary community use. If appropriate for meanwhile activities, Newham will secure a Management Strategy through a planning condition or legal agreement, which should identify the proposed steps to promote the meanwhile activities on the site (see also Policies BNF1 and HS1).

An updated Built Leisure Needs Assessment and Play Pitch Strategy are underway. Early findings from the Interim Built Leisure Needs Assessment (2022) have fed into the emerging Local Plan. The work on both these studies are ongoing into 2023. The Play Pitch Strategy in particular needs to consider the use of facilities over the course of a year since some sports only take place during specific seasons.

Officers agree that the local community should be consulted on applications where community facilities are being proposed or lost. Policies CF1, CF2 and CF3 provide steps to ensure the community is consulted and needs are properly considered before a planning decision can be made.

The need for more facilities in general has been addressed above in response to Q1. With regard to combating loneliness, again as stated above, the policies proposed in this chapter seek to protect facilities which are needed in a neighbourhood, many of which can help combat loneliness. Faith groups, community halls, youth zones, sports clubs and other community facilities all play an important role in creating stronger communities.

Support from the Mayor of London on embedding social value into the management of public spaces, in line with the London Plan, is welcomed.

We welcome Sport England's recommendation to use their 'Designing for physical activity' guidance in order to promote physical activity in the borough to achieve the Building a Fairer Newham strategy.

The policies in this chapter seek to protect those community facilities which are needed to support successful 15 minute neighbourhoods. With regard to protecting local heritage, this is addressed in the Design Chapter, in policy D10 Designated and Non-Designated Buildings, Ancient Monuments and Historic Parks and Gardens.

A Local Plan Viability Assessment is being undertaken to support the development of the policies being proposed at Regulation 18.

As part of the evidence to inform the policy approach in the chapter, we undertook a Community Facilities Needs Assessment (2022). This study mapped the provision of community facilities and identified areas of deficit. We are also working on a Playing Pitch Strategy (emerging) and Built Leisure Needs Assessment (interim to be published at Regulation 18). These studies have given us an up-to-date picture of community and leisure facilities and will be used to inform future planning decisions.

Officers agree that food security for our residents is an important strategic need, and indeed, it forms a key element in [Newham's Corporate Plan](#). The Council developed a [Newham Food Alliance](#) with the voluntary and charity sector to provide food support for people in need. The Community Facilities Needs Assessment sought to better understand which of the borough's existing facilities have the ability to store and/or prepare food. In July 2021, Newham adopted its '[We are Food Secure. Young People and Food Security Strategy](#)'. This includes a number of initiatives, including food banks. Newham's [Health and Wellbeing Strategy \(2020\)](#) also includes Priority 6, which seeks to create a healthier food environment. The importance of community facilities having space to store and prepare food is reflected in Policy CF2, which requires new and re-provided facilities to carefully consider the design of the facility being proposed. The implementation text highlights that the layout, types of facilities provided (i.e. kitchen and food storage spaces) and storage was a common issue raised by those consulted under the Community Facilities Needs Assessment (2022).

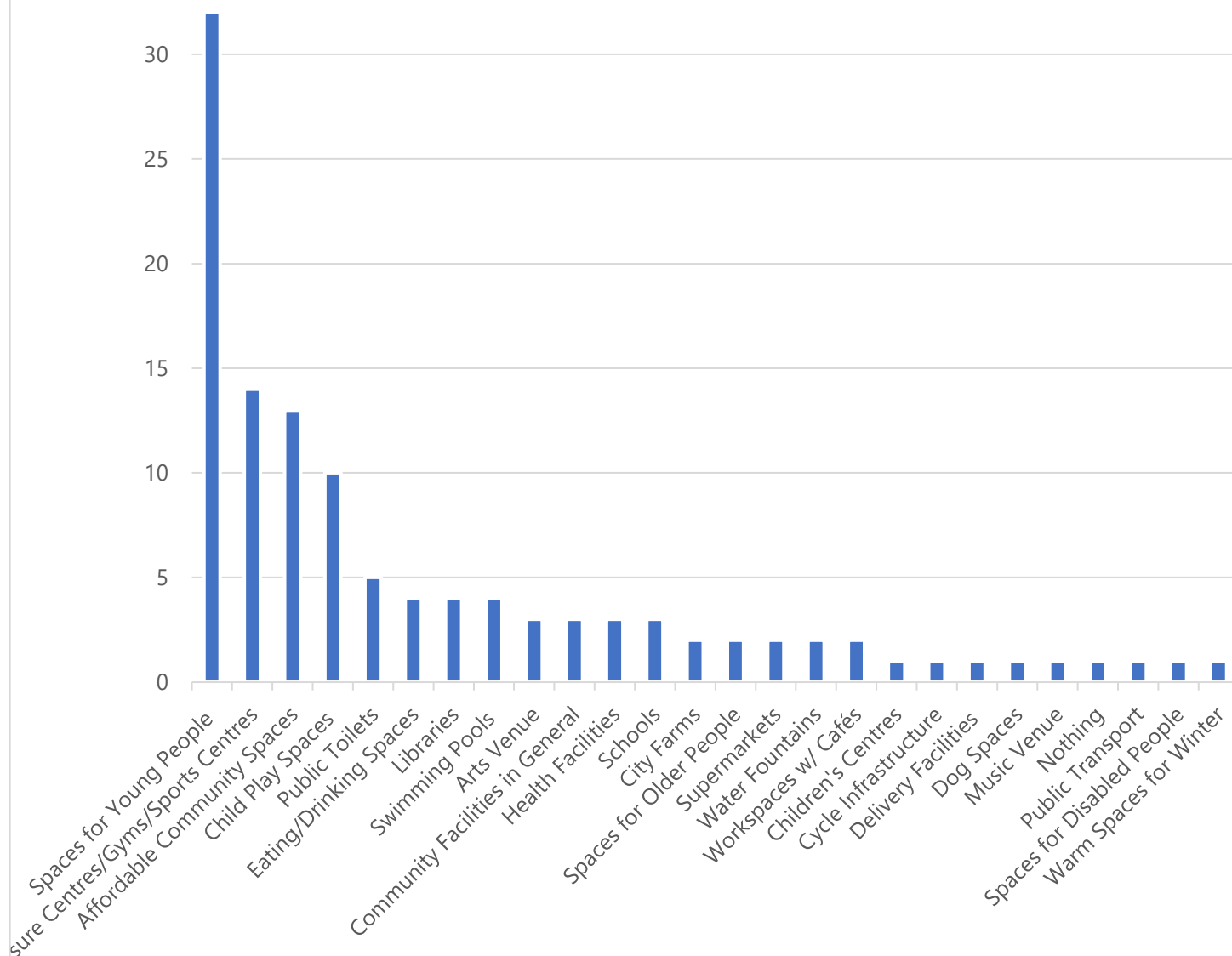
Q4. How far (considering travel mode and duration) do you usually travel to access community facilities?

- 1 resident said it takes them 0-5 minutes
- 3 residents said it takes them 5-10 minutes
- 5 residents said it takes them 10-15 minutes
- 4 residents said it takes them 15-20 minutes
- 8 residents said it takes them 25-30 minutes
- 1 resident said it takes them up to 1 mile
- 2 residents said it takes them 1-2 miles
- 1 resident said they do not travel

Officer Response:

The low level of responses to this question makes it difficult to draw any meaningful conclusions.

Q5. Which community facilities are missing from your neighbourhood?



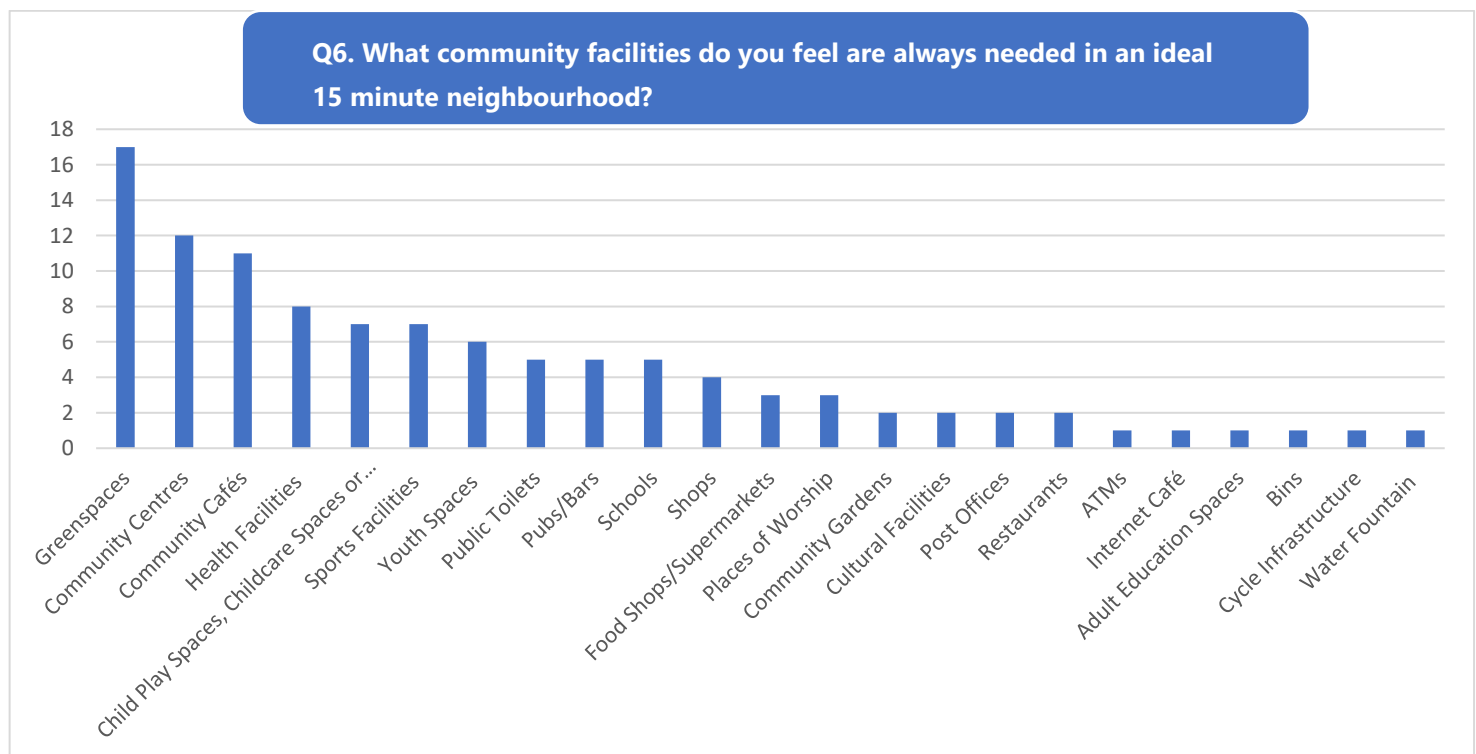
Officer Response:

The responses to this question have helped inform policies in the Community Facilities chapter and reinforced the need for a separate policy on play and informal recreation. A new policy, GWS5 Play and Informal Recreation for All Ages, is included in Green and Water Spaces chapter of the Local Plan.

The responses to this question have also reinforced the importance people place on local facilities. It supports the need for the Local Plan to take a policy approach which protects existing facilities and which seeks to support the delivery of new facilities to meet the needs of a growing population.

A requirement for leisure centres, gyms and sports facilities in general is strongly expressed. Officers recognise the need to provide leisure facilities in locations which are accessible to people living in the borough. The Interim Built Leisure Needs Assessment (2022) has undertaken an assessment of the Borough's existing leisure facilities and considered how the growth over the plan period will impact the need to deliver new/improved facilities. The recommendations from this work will inform future leisure provision in the borough.

There is also a strong demand for affordable community spaces. This echoes the feedback from the work undertaken on the Community Facilities Needs Assessment (2022). The study highlighted that there are a series of interrelated factors which impact affordability for both facility managers and organisations which use facilities. For people who manage or operate a facility, predominant factors include the ongoing costs of management and maintenance (utilities and repair) and staffing costs. For organisations, the predominant factor includes hire or leasing costs. These factors are also dependent on the type of building and whether it is Council or non-Council owned. The policies in this chapter require new community facilities to provide a Social Value and Health Impact Assessment (see Policy BFN3). This assessment will include an understanding of the affordability of any new or reconfigured community facility.



Officer Response:

A strong desire for greenspaces has been expressed. The Green and Water Spaces chapter in the Local Plan seeks to address the protection and enhancement of existing green and water spaces (quantity, quality, function, access, and connectivity), the creation of new biodiverse places and the

development of green and waterside corridors to better link these spaces. The chapter is being informed by an emerging Green and Water Spaces Infrastructure Study.

Community centres and cafés are other facilities which are clearly desired in a 15 minute neighbourhood. The policies in this chapter support the protection and delivery of community centres. Officers agree that Newham's community facilities play an important role in providing spaces where people from different backgrounds can meet, socialise and have shared experiences. It is therefore important to plan for, design and manage community facilities to help facilitate social interaction.

Q7. Would any other community facilities benefit from a standalone policy?

- 3 residents said community centres
- 2 residents said libraries
- 2 residents said parks
- 2 residents and Newham Councillors said places of worship
- 5 comments said schools/children and young people spaces
- 2 residents, including those from LBN Public Health and Mayor of London, said there is no need for a standalone policy and 2 residents said they were unsure, whilst 1 resident supported a simplified policy
- Sport England said that sports and playing fields should get a standalone policy
- Other facilities mentioned included health facilities, arts facilities, pubs, public toilets, recycling facilities, and sports facilities

Officer Response:

Officers welcome the feedback on this question and the information which has been provided as to why certain standalone policies on community facilities in the Local Plan would be helpful.

The Local Plan chapter on community facilities provides a policy on the loss of community facilities (CF1), the delivery of new and reconfigured facilities (CF2), cultural and leisure facilities (CF3) and a policy on education and childcare facilities (CF4). It is felt that this strikes the right balance between providing specific guidance for certain uses and the need to simplify and provide clarity on the approach to community facilities.

It is clear that a policy to protect and deliver facilities to support young people (CF4) and the approach we take to championing cultural and leisure uses (CF3) are key uses which respondents felt should be addressed through standalone policies.

Community centres, libraries, places of worship, health facilities, public toilet and pubs are all addressed in policies CF1 (loss of facilities) and CF2 (provision of new facilities).

Parks and playing pitches are addressed in the Green and Water Spaces chapter (policies GWS1-GWS5).

Q8. Should we reconsider the Town Centre First approach to the location of community facilities?

- 5 residents do not consider the Town Centre First approach should be more flexible, whilst 13 residents support more flexibility, and 4 residents are unsure
- TfL, Mayor of London, and residents said that community facilities should be located in accessible locations so people without cars can get to them and so they are easily reachable by public transport or active travel
- The Mayor of London and developers said the policy should align with the London Plan
- 1 resident said there is a conflict between the Town Centre First approach and the 15 minute neighbourhood
- LB Redbridge said that larger community facilities should remain in Town Centres and Stephen Timms MP said that residential areas need to be protected over community spaces, yet residents said that community facilities need to be protected from housing developments
- Newham Councillors said that facilities such as places of worship need to be considered outside of Town Centres so everyone can access them

Officer Response:

The responses to this question have informed the amendments we have made to our approach to the location of new and reconfigured community facilities (Policy CF2). Convenient access to community facilities is important, as it allows for a range of people to easily use the services they need. We propose to take the same approach to main Town Centre uses, as set out in the National Planning Policy Framework and London Plan. A table, provided in the introductory text to the Community Facilities chapter, provides a helpful guide on which policy is applicable to which type of facility and indicates which facilities are considered main Town Centre uses. However, as with the London Plan, the list is not intended to be exhaustive and other uses can be included as community facilities.

Officers recognise and agree that some community facilities naturally serve a catchment outside of a local neighbourhood or indeed the borough boundary. Community facilities with wider catchment areas (for example youth centres and larger places of worship) which can attract higher numbers of trips may create friction in residential areas due to increased traffic, noise and large numbers of people coming and going. It is therefore considered that larger community facilities and those attracting users from beyond the local neighbourhood are therefore best located in Newham's Town or Local Centres.

We agree that larger and more popular community facilities should be accessible by a range of sustainable transport modes. As such, they should be directed to transport hubs and locations in close proximity to bus stops. It is important that community facilities consider how both users and staff will travel to and from them.

There may however be some flexibility on location, depending on the type and scale of the facility being provided and indeed, some relaxation to the Town Centre First approach is now being proposed (CF2.2). In all cases, community facilities should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach.

A sequential assessment must be submitted as part of any planning application for the development of a main Town Centre use (as defined by the NPPF and London Plan (2021) Policy SD7) that is not in a designated centre and not in accordance with the Local Plan.

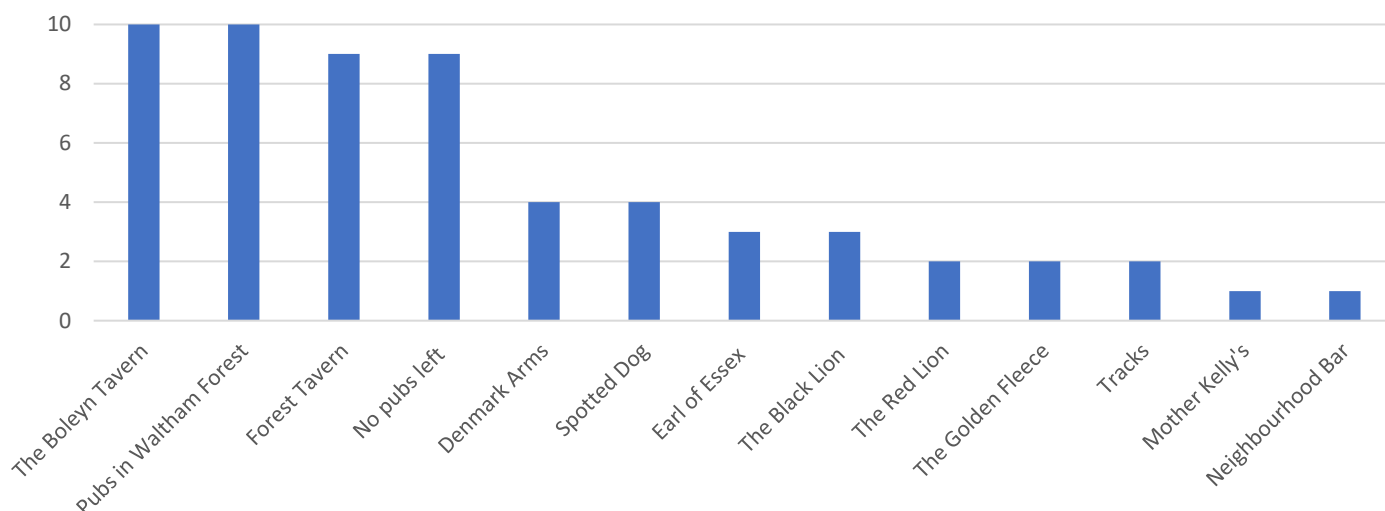
Q9. Should we have a specific policy approach on public houses and their protection?

- 18 comments showed support for a pubs policy, 1 resident said they were unsure, 1 resident said that pubs should only be protected if they have historic interest, whilst 2 residents said that there are other community facilities that should be prioritised
- 4 comments support a public toilets policy, and 2 residents said that more public toilets are needed generally
- 1 resident said that the current toilet scheme at Newham does not work

Officer Response:

The Community Facilities Needs Assessment (2022) undertook a mapping exercise to understand the provision of public houses in the borough. In 2001, there were 105 pubs in Newham, while the recent study identified only 58 pubs in the borough. Whilst this loss is concerning, the Community Facilities chapter does not propose to include a policy specifically directed to public houses. This is because policies CF1, CF2 and CF3 in this chapter apply to public houses (affording them protection from loss). Officers consider the protection provided by the policies in this chapter and Policy HC7 of the London Plan (2021) mean that a standalone pubs policy for Newham is not required. Policy HC7 of the London Plan requires planning decisions to protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for Town Centres.

Q10. Are there any pubs which are important to you in your neighbourhood?



Officer Response:

We welcome the responses to this question – they have helped Officers understand which public houses are valued in the community. See the response above regarding the approach we are taking to the protection of public houses from loss.

Other themes:

- LB Redbridge said that the movement of pupils between Newham and Redbridge balance each other out
- 1 resident said City Hall should be a community space

Officer Response:

We note LB Redbridge's comment regarding the movement of pupils between Newham and Redbridge.

Regarding City Hall, parts of the building are open to the public on Mondays to Thursdays and on Fridays. This includes access to 'London's Kitchen Café', which has views over the Royal Docks. More information about public access to City Hall can be found here: <https://www.london.gov.uk/about-us/our-building-and-squares/what-can-you-visit-city-hall>.

Below are the responses provided in the un-facilitated and facilitated workshops.

OUR COMMUNITY FACILITIES



Discussion Summary

- The group was very engaged in the topic and came with a wealth of experience and perspectives. The group shared an understanding of, and commitment to, community facilities in Newham.
- The proposals, outlined by Newham's planning policy team, sparked a range of conversations. This included the **ongoing need for access to public toilets** as well the **need to potentially move away from a town centre first approach**. There was also a sense that a public house policy was potentially not necessary for Newham.
- There were interesting discussions about the **social value that community facilities provide** (in both the short and longer-term) and a need to better understand this value, as well as **being able to articulate social value as part of the planning process**. This needs to be conveyed to communities, especially where new facilities are being proposed, so people buy into the wider benefits of new developments.
- Practical considerations relating to community facilities were also discussed. **The design and accessibility of community spaces were seen as vital components** and something that planning policy can influence. This included groups having access to storage space as well as **meeting the wide range of accessibility needs of our residents**.
- The role planning plays in the wider system also came out as a key area for discussion. The **success of community facilities is dependent on a range of factors**, this includes having accessible transport, people feeling safe to attend community facilities. A key piece of work that will help inform this understanding is a **mapping exercise of formal and informal community facilities**.

Jamboard Comments

Community facilities are the glue that make you feel part of a place

we don't have a child-centred focus for community facilities

Need to do things holistically and imaginatively

How do we build a network between the different spaces?

From the information you have had so far, how do you feel about the proposals?

Feedback	Percentage
Good	55%
Not bad	45%

Proposals discussed

1. Reviewing the town centre first approach	4. NEW POLICY Education and Childcare Facilities
2. Management of spaces – embedding social value	5. NEW POLICY Public Houses
3. Reduce policy complexity – Existing (loss/change) – New and enhanced	6. Public Toilets

WE ARE NEWHAM.

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People at the Heart of Everything We Do

Workshop Theme	Jamboard Summary
Community Facilities – 20 th November 2020	Social integration/resilience: - Community facilities play an important role as places to access community support and activities that support cultural identity, but the organisations themselves need to be supported to be able to provide sufficient and quality services (capacity building). In places there has been a loss of capacity due to experienced leaders being lost, e.g. due to Covid19. - Lots of the activities and information about them have moved on-line due to the pandemic, but this creates a barrier for some of the most vulnerable people. Physical presence still needed, including as ways of disseminating what support/activities are available. Pop-up spaces can help. - Places of worship provide a network of social support. Policy should support further spaces that can allow increased capacity to diversify activities, including meanwhile use. Facilities in out of centre locations - Smaller facilities could be supported within residential areas, e.g. community halls, places of worship. Current size limit of 75sqm too small; physical size needs may need to differ to allow for flexibility on activities. Geographical coverage: - Felt that there is low access to community spaces in Forest Gate and Green Street areas. People do not know what to access, where, what is available. - Council assets should be utilised to support community uses. Cultural uses - Support for establishment of museums and galleries. They will help encourage a sense of place and encourage creative economy; e.g. the Passmore Edwards Museum in Stratford, now closed, was a valued asset.
Community Facilities – 29 th November 2020	High Street uses - Dark kitchens raised a possible concern, but it was suggested that the food rating process should help in their regulation already. - Needs to be more flexibility in the uses allowed in Local Centres. Katherine Road cited as an example where there was a need for a bigger consultation room in the pharmacy. Access to healthy food - Need to be able to access quality food locally within 15mins. At the moment, we have to travel too far. - Would like restaurants and a better quality food offer. - Local shops often do not offer a good quality food offer. Vacant space, dilapidation and crime - The only bank in Plaistow Centre is now closed – can the Council intervene? - Freemasons Road is in such a bad condition. - The amount of empty buildings in Newham's high streets is a problem – they look abandoned. This leads to fear and more problems.

	- We need to think about what to do with empty spaces – can we access them as a community? - The Council should make it easier for the public to know about spaces which are vacant. - The northern end of High Street North has a drinking and drug problem. There are not many desirable community facilities in this area.
	Design - Need to think about the design of pavements and lighting, which are often poor – need to design out crime in the high street. - Need better-designed cycle paths.
	Geographical coverage: The Local Plan needs to think about all areas of the borough, not just the affluent areas with change.
	Existing community facilities - Do not use the library. Are the libraries open in Newham? - There should be more structured activities put on in libraries. - Libraries, and what they offer, are not promoted enough. - Impact of Covid-10 – what services can the Council afford to offer? There may need to prioritise. - Why is the Council closing down the farm? This is against providing space for people. - Stratford Park – there are three empty building abandoned in the park. There is a corner with nothing happening – this leads to antisocial behaviour. - Why are so many community facilities closed? For example in Canning Town North Ward – the Ascot Centre and the space in Star Lane, Hamilton Road Centre, and the Grassroots Centre in Memorial Avenue are all closed to the community. - Community facilities have been de-funded and understaffed. Shed 22 in Custom House, Hartley Centre in East Ham. - Canning Town Library is a wonderful heritage building that is sitting empty.
	Multi use It would be really good if school grounds and buildings could be opened up for community use during the evenings and holidays. This would give communities more localised facilities to use.
	Public toilets There is a lack of public toilets at stations and on bus routes. This is a problem if we want to encourage people to use public transport.
	Planning process - There needs to be more help from officers before coming it to planning. - Building control could be more helpful.
	Consultation process Need to consider the digital divide. Future consultation on the Local Plan should have better access to hard copies. Online is difficult for the community to engage.

Officer Response:

We welcome the range of feedback we received on the community facilities policies in the workshop held. The importance of community facilities for social interaction and in particular, the value of local organisations during the pandemic, is also recognised by Officers. [Building a Fairer Newham \(2022\)](#) pledges to enable every resident to live in an accessible and inclusive neighbourhood which will provide all of their social, civic and economic essentials. Community, leisure, cultural and education facilities all play an important role in supporting and enriching people's lives. It is also important to recognise that both formal social infrastructure (such as health and education provision) and informal spaces and services (like hairdressers, cafés and pubs) provide important networks that make communities more connected and resilient.

Regarding introducing greater flexibility for smaller community facilities (allowing them to be provided closer to the communities they serve), Policy CF2 does now relax the strict Town Centre First approach in the 2018 Local Plan (INF8). Smaller facilities can now be located more easily outside of a designated Town or Local Centre. The size threshold has also been raised to 1,000m² from 75m² in the 2018 Local Plan.

Regarding the perception that there is low access to community spaces in Forest Gate and Green Street areas, the Community Facilities Needs Assessment (2022) actually found that there are 44 and 37 community facilities in these areas respectively. When considering the population in these areas, Forest Gate has a community facility density of 17.8 per Km² and Green Street is 25 per Km². Interestingly, the highest density of facilities across any ward can be found in Green Street, mostly places of worship. This may be why there is a feeling that these areas lack community facilities – since the uses in these locations are predominantly places of worship.

We acknowledge the point raised around the need to protect and deliver more cultural facilities. We have introduced Policy CF3 Cultural and Leisure Facilities. It seeks to protect existing cultural and leisure facilities and direct new provision in areas of deficit. The Community Needs Assessment (2022) found that cultural facilities have the fewest numbers across the neighbourhood areas, with a total of 10 music venues, dance halls, cinemas and theatres. Stratford and West Ham have the highest cluster of cultural facilities, however, they have no galleries. Out of the seven galleries identified, Beckton and Royal Docks and Custom House and Canning Town have three each.

Dark kitchens are addressed in Policy HS7 Delivery-led Businesses, in High Streets chapter of the Local Plan. In the case of the food and drink industry, the increased demand for deliveries from popular restaurants and cafés is leading to more demand for dark kitchens, where food is prepared on-demand in commercial kitchens with no customer access. Policy HS7 seeks to support dark kitchens in areas identified as suitable for employment or along high streets where their impacts on the Town Centres Network can be managed. The policy should be read alongside policies T3 Transport Behaviour Change and T4 Servicing a Development.

Officers agree that access to healthy food is an important issue, which is addressed in the High Streets chapter of the Local Plan and specifically in Policy HS6 Health and Wellbeing on the High Streets. This

policy supports the ongoing need to create a healthy food and drink environment, and addressing affordability and access to support the delivery of the [50 Steps to a Healthier Newham](#) Strategy.

Officers agree that vacancies and blank frontages, particularly when clustered together, can have a negative impact on the perception of place (including safety), reducing footfall, and in the long-term may lead to antisocial behaviour along these frontages. Policy HS2 introduces new tools in the form of a Market Strategy and a Meanwhile Use Strategy requirement to help manage longer-term uncertainties in the market and secure the vitality of viability of both existing and future centres.

The design of public realm is addressed in Policy D2 Public Realm Net Gain in the Design chapter of the Draft Local Plan. Policy D2 addresses a number of issues, but in respect to the points raised in this workshop, the policy will require new and refurbished public realm spaces to:

- Be accessible to a range of mobility needs and preferences.
- Support comfortable pedestrian movement of people through space, and be scaled appropriately to support any additional proposed landscaping and activation.
- Promote a feeling of safety through good design. Surveillance solutions, such as CCTV, should be targeted only where necessary.
- Be inclusive, welcoming and interesting, fostering community ownership and social integration.

In respect to the concern that the Local Plan must consider the whole borough, and not just the growth areas, the revised Local Plan sub-divides the borough into 16 distinct neighbourhoods. This provides the ability to shape growth at a more local scale, and not just in those areas experiencing the most growth. These neighbourhoods have been identified through the Newham Characterisation Study 2022 and informed by public engagement, which took place in autumn 2021. Newham's spatial strategy is underpinned by the 15 minute neighbourhood concept, whereby every resident in Newham is able to live in an accessible and inclusive neighbourhood which provides their social, civic and economic essentials. The strategy is not intended to create isolated and self-sustaining areas but to support access to services and facilities for everybody. The 15 minute neighbourhoods therefore form part of a wider network of connected neighbourhoods, which give residents a choice in where they access different facilities and services, whether that is within their own neighbourhood or within the wider network.

Existing community facilities are protected by Policy CF1. In future, Applicants wishing to bring forward a development which will impact an existing community facility should first consult Newham's Community Facilities Needs Assessment (2022) to understand existing provision in the borough and if the proposal site falls in an area of deficit. Appendix B of the assessment provides a starting point for Applicants to help understand if the proposal falls in an area with an existing need for a community facility. The maps take into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.

Furthermore, Policy CF1 requires a Social Value Health Impact Assessment (see Policy BFN3) to support any application for a loss, reduction, replacement, reconfiguration or relocation of a

community facility. The scope of the assessment will be agreed with the Council at the earliest possible stage of the planning process. The following will be required as a minimum:

- Detail on how to maximise the proposal's positive health and social effects and minimise its negative health and social effects.
- Engagement with all the relevant bodies/organisations involved in the provision of services.
- Evidence to demonstrate who uses the facility or former users (where the facility has declined or closed).
- How the needs of the existing users or potential users (where the facility is not currently in use) have been considered before making the proposals to the facility.
- Why the change to the facility is needed and how this best meets the needs of those using the service or potential users (where the facility is not currently in use).
- Detail of other community uses for which there is an identified need in the locality (within a radius of 400m of the premises/site or neighbourhood – subject to the planning application) which could reasonably be accommodated from the existing premises/site.
- Detail of consultation with public and community service providers, including Newham Council, to establish their needs and accommodation requirements.

Policy CF4 addresses the need for new education facilities to provide access for community uses outside of core hours, which include before and after school hours, half terms, and summer holidays.

All spaces within educational facilities, including classrooms, halls, gyms, outdoor spaces, and canteens, should be available for local community groups and the Council. In order to guarantee access to the community, a Community Use Agreement will be secured that will prioritise community uses at affordable rates.

Policy CF4 requires the layout of new education facilities to be sufficiently flexible to adapt to different community uses, which includes, but is not limited to, full accessibility for people with reduced mobility. The flexibility of the proposed space should be demonstrated in the Design and Access Statement.

Officers agree that the provision of public toilets is important. Policy CF2 requires major schemes with large numbers of visitors to provide public toilets. Where appropriate, community facilities should incorporate public toilets which make provision for those people with learning and physical disabilities and their carers. The following facilities are considered especially appropriate for this provision:

- Sport and leisure facilities
- Cultural centres, such as museums, concert halls and art galleries
- Town halls, civic centres and public libraries
- Education establishments
- Health facilities, such as hospitals, health centres and community practices

Where appropriate, community facilities should also incorporate public toilets, which make provision those for people with learning and physical disabilities and their carers.

Officers acknowledge the financial difficulties facing community organisations and the important services they provide. This chapter seeks to protect Newham's existing spaces, those which support our communities, and directs the provision of new facilities to areas where they are needed, seeking to ensure they remain affordable to rent.

Newham City Farm is addressed in the Green and Water Spaces chapter.

Officers agree that Canning Town Old Library is one of Newham's most important heritage assets. In November 2021, the Council secured LUF funding to invest in the future of this building. This funding will provide an opportunity to celebrate Newham's thriving culture and rich history.

Officers note the feedback on the planning and building control service needing to be more helpful.

The next round of consultation will address the issues raised with regard to engagement methods. A range of consultation methods will be used to ensure everyone is informed about the consultation taking place.

Q1. Do you agree with the proposed changes?

- 17 comments from residents, developers, the Mayor of London, LB Redbridge, and LB Waltham Forest support the proposed policy changes, especially a greener economy, securing better paid jobs in the right locations, updating evidence to identify which employment land needs safeguarding or releasing in order to support growth sectors, and aligning with the London Plan's Objectives GG1 and LP2021
- 4 residents partly agree with the proposed changes, being concerned over whether policies will actually get implemented, as well as workspaces not being affordable and accessible, there being no rent control for local businesses, and there being no employment opportunities for recent graduates
- 2 residents do not agree with the proposed changes, in part because they are too inward-looking
- 1 resident is unclear about the proposed policy changes
- Developers support the ambition to build an inclusive, fair, and green economy and propose using the Bromley-by-Bow site to test this, as well as suggesting the need to consider appropriate typologies for land allocations via the Employment Land Review, to safeguard as much employment land as possible given the overall loss and encourage its intensification, and to increase digital infrastructure such as data centres
- The Marine Management Organisation supports proposals that result in a net increase in marine-related employment as per the South East Marine Management Plan, and Port of London Authority supports the consideration of piers and structures and the safeguarding of wharves

Officer Response:

Officers welcome the consultation responses in support of the proposed policy changes, particularly in relation to perusing a greener and more inclusive economy that delivers fairer outcomes for residents and businesses. The economic policies align with the Good Growth policy areas (notably GG1) within the London Plan, with the broad economic vision and approach informed by Newham's Recovery and Reorientation Strategy. Guided by this vision, the economic policies aim to tackle key social, economic and environmental challenges for Newham. The approach aims to equip residents with the skills, knowledge and training to be part of Newham's economic future. Policy J4 principally focuses on inclusivity and aligning with the Council's Recovery and Reorientation Strategy and, subsequently, a community wealth building approach driven by the Council to tackle inequalities, create economic opportunities and support a greener economy. Incorporated into this policy are Newham's Community Wealth Building business pledges which provide a framework to maximise economic opportunities from development whilst aligning with wider Council ambitions. These pledges respond to key issues around quality of employment (pay and work standards), sustainability and innovation, in which all economic developments are expected to respond to in their proposals. The policy also seeks contributions for training and skills development for residents via the Council's 'Our Newham Work' brokerage.

Officers welcome consultation responses recognising the importance of employment land to support economic growth in Newham and across London. Ensuring a sufficient supply of employment land is a key objective of the plan (and national policy) and plays a significant role in the context of post Covid-19 recovery and delivering jobs and economic opportunities within the borough. In line with National and Regional planning policy to ensure economic policies are informed by the most up-to-date evidence, Newham has updated its employment land evidence. This includes a qualitative audit

of the borough's employment land alongside an assessment of future demand for 'the need' for offices and industrial uses. The purpose of the study is to assess the demand to identify land to meet economic need and support growth. The study concludes protection of all employment land is required i.e. resisting losses, addressing demand for continuous industrial growth, and intensification of employment sites (as set out in London Plan Policy E7) to meet economic needs (a requirement of national policy). For offices, supply outstrips demand, in which office provision is directed to the borough's Town Centres (in particular Major office to Stratford). Policies J1, J2 and J3 have been drafted to manage employment land and reflect this position. The protection of employment land also supports engagement responses around creating better economic outcomes for residents and maximising these opportunities, through land available for economic purposes. The employment evidence suggests that to meet identified need, policies must support delivering 335,000m² (or 51ha) of industrial/warehousing floorspace and 90,000m² of office floorspace by 2038. These are based on trends from the last ten years for industrial and office jobs' forecasts respectively.

Officers welcome the support for Local Plan objectives and the economic component to create a greener and more inclusive economy in Newham. This ambition is a principal objective of the Economy chapter and has partly been informed by the Council's Covid-19 Recovery Strategy (Pillar 6) to drive the greenest economy. Also supporting this vision is the Council's climate emergency declaration and better environmental resilience. In response to the consultation comments around supporting a greener and more inclusive economy, the policies have largely been drafted to reflect these ambitions.

Policies J1 Employment and Growth and J4 Community Wealth Building and Inclusive Growth commit all major economic development to a greener economic future and as such all investment in Newham must align with Community Wealth Building Principles which includes a green economy. Whilst further evidence is required to establish specific Green Zones, Policy J4 sets out the criteria for which economic development is expected to contribute to this ambition. The policy addresses points raised in the consultation particularly around improved resource efficiency, embedding circular economy principles, delivering net-zero, and prioritising local supply chains as well as seeking investment in jobs and skills within the green industries. In pursuit of a diverse economy, policy J1 also recognises the growth in green and low carbon industries which aim to support new investment and floorspace across employment locations where these are expected to thrive. This has been informed by employment land evidence (audit and market overview) as well as wider strategies which seek a greener low carbon future such as the Royal Docks Economic Purpose. Proposals supporting a green economy should be read in the round with other policies including CE2 Zero Carbon Development, CE5 Retrofit and Circular Economy, and W4 Utilities and Digital Infrastructure.

Delivering a diverse range of accessible workspaces that meet business needs is a key tenet of the economic policies and recognised as a component of sustainable economic growth as set by national policy. Comments were received noting that economic policies need to support a range of business needs and a range of different workspaces to support a diverse economy. The different employment designations all support a diverse range of employment spaces and uses, including cost efficient and SME spaces within Town Centres, logistics and warehousing close to the strategic road network, and a

range of industrial and business uses across other employment designations. This has been informed by an update to an audit of employment locations to ensure these locations are fit for purpose and will continue to attract investment over the plan period. The policy has evolved to make allowances for new employment floorspace outside of designated employment locations (as well as applying a criteria to losses in business spaces) providing they create (net) increases in employment floorspace, create new economic opportunities as part of the 15 minute network or help to deliver new affordable workspaces. The creation of new employment clusters in these locations will also reduce people's need to travel further afield for employment alongside supporting economic needs for the borough.

Improving digital infrastructure and connectivity is an important component of the overarching strategy and pursuit of an inclusive and modern economy. The Homes chapter acknowledges flexibility and adaptability in design and layout to enable changing needs within the home to include working from home. This should be read in conjunction with the Utilities policy, which requires new development to demonstrate there is sufficient digital infrastructure to meet the needs arising from development, including connectivity for end users and support for the digital 'Newham Sparks' programme by the Council. The policy also supports in principle projects set out in the Infrastructure Delivery Plan, including digital infrastructure needs across the Plan period. As a principle, digital uses are supported on employment land, recognising the digital sector as an area of growth within the Plan period. Policy W4 (Utilities and Digital Infrastructure) recognises digital infrastructure as new utilities critical to connectivity and sustainable growth. The support for digital infrastructure on employment designations is incorporated as this is recognised as key infrastructure to support economic growth. Policy W4 therefore aims to secure the delivery of sufficient digital infrastructure in line with growth, recognising the multi-functional benefits this can bring as part of a modern economy and improved connectivity. The policy also supports digital projects led by the Council as part of 'Newham Sparks'.

Officers welcome comments from the MMO and PLA, recognising both as key stakeholders relating to marine and river-based employment. Policies J1-J3 ensure Strategic Industrial Locations will be protected and intensified for new industrial floorspace. This includes those locations with safeguarded wharves, to protect their capacity as per London Plan policy S115 and promote uses associated with this function. The consolidation of wharves identified for release and continued safeguarding of wharves follows the approach set by the London Plan (and carried through from the 2018 adopted Plan) informed by the GLA Safeguarded Wharves Review Decision in 2020. Informed by the employment land audit, policy J1 notes that marine-related employment is also supported as part of the priority uses associated with the boatyard on Albert Island (LIL).

Policy J1 requires for all economic development to submit an Economic Strategy to ensure the configuration and typology of the proposed space for economic uses is informed by robust evidence and justification to meet the needs of the market. All proposals incorporating employment floorspace are therefore required to respond to demand evidence, and seek to deliver typologies required by the market. This process enables proposals to robustly demonstrate that economic development delivers on the objectives of the Council whilst robustly justifying (through evidence) the types of spaces provided. The economic evidence provides further analysis (including the market view) around the

intensification typologies of space, which has informed policy J2 for new employment floorspace. Proposals will therefore ensure that the spaces provided have maximum prospects of occupancy, and respond to the market as well as the delivery of space that meets occupier needs.

The policy is supported by additional justification and text to aid with the application of the policy. This includes further detail around how to implement the policy, signposting relevant information, and guidance and detail where required. All economic development (any proposals with economic floorspace) in Newham are expected to respond to this policy with an emphasis on robust and sound economic evidence to support applications at the application stage.

Q2. Are there other changes we should consider?

- 2 residents said there are no further changes that should be considered, whilst 1 resident said there are undoubtedly other changes that should be considered, and 1 other resident said they have no opinion
- 16 comments, including some from Newham Sixth Form College, LBN Public Health, and the Royal Docks Engagement Team, mentioned that there should be more consideration toward education and training, including the acknowledgement that good quality education is key to gaining employment and upskilling residents to tackle deprivation and sexism in the workplace, as well as the need to focus on SEND, and providing training and work placements for graduates
- 2 residents mentioned the need to further consider the green economy, including better use of green tech, promotion of green businesses, and ensuring that external businesses that invest in Newham align with local green policies
- 2 residents mentioned the need to consider activating existing work spaces as meanwhile uses to offer cultural spaces
- Other factors that residents proposed to consider include: supporting small businesses with rent, placing resources into bringing businesses into Newham, attracting good-quality businesses to increase employment opportunities, thinking about large-scale sites such as the Royal Docks, and promoting Newham's creative economies
- The Port of London Authority supports identifying sufficient employment land and specifically activating Peruvian & Royal Primrose Wharves, in line with the London Plan's SI15 policy
- LBN Public Health voiced how the lack of childcare provision causes a barrier to employment which needs to be addressed, together with informing residents about employment rights, job search skills, and health, as well as support green transport to get to work, such as cycle storage units and active travel routes
- LB Redbridge highlighted the importance of supporting Stratford as a major office market that complements the employment offer in Docklands and Canary Wharf
- The Mayor of London and developers said that the 15 minute neighbourhood concept can be applied to employment land designations by providing co-working and flexible workspaces in Town Centres to secure employment opportunities
- 1 resident highlighted the need to remember that Newham's economic makeup includes a considerable outflow of workforce into other boroughs

Officer Response:

Officers welcome the recognition of high-quality education and training as a key component of creating an inclusive and sustainable economy. This relationship between education and economy is acknowledged in Policy J4. A core objective of policy J4 is for development to create high-quality

economic opportunities for all, in response to economic challenges faced by Newham residents. Aligning with the Recovery Strategy, the focus of Policy J4 is on inclusivity (including young people as stipulated) to ensure residents are equipped with the skills and training as part of Newham's economic future. This policy requires major economic developments to establish links with the Council's brokerage and/or education providers as part of the Community Wealth Building commitments to improve economic, skills and training opportunities i.e. apprenticeships and placements for local residents. The policy is clear that economic opportunities that are created are for all, irrespective of challenges and barriers to employment such as health status or caring responsibilities. The core ambition is to equip residents with skills, knowledge and training to contribute to Newham's inclusive economic future. This includes creating new jobs within growth sectors set out in J1.

Policy CF4 also supports the delivery of high-quality education in line with growth and training facilities where there is a need.

The response to the Green Economy is set out in Q1.

The response relating to safeguarded wharves is set out in Q1.

The response to office provision is set out in Q1. Officers welcome the support for Stratford as a Major office location. This has been informed by the Employment Land Review in which it is identified that Stratford has sufficient supply to meet the identified demand.

Officers welcome support for the approach to include employment land and new business locations within the 15 minute network, which is a wider spatial objective of the Local Plan. This was informed by a 'pillar' of the Council's Recovery Strategy, which promotes the 15 minute network recognising its role in enabling residents to live in accessible and inclusive neighbourhoods, including economic opportunities.

For employment designations this is principally about creating new floorspace in jobs as part of the overall connected network, to maximise economic opportunities and provide residents with a choice and improved access to jobs locally. Proposals are expected to maximise economic opportunities on employment land, which is principally about maximising the economic potential of sites and creating a diverse range of local employment opportunities across the Borough. This helps maintain the 15 minute objective. This approach also recognises industrial land less as an 'edge of borough location' but more included as part of this network with a spatial approach in which proposals are expected to understand holistically the economic opportunities or lack of within a 15 minute walk. Employment designations form part of this overall network, taking into consideration where employment deficiencies within the 15 minute network may be located.

Where deficiencies in economic opportunities are identified, Policy J3 seeks to 'plug the gap' through new smaller-scale employment floorspace in these locations. This approach was supported in the Employment Land Review, in pursuit of need to maximise local economic opportunities to support

economic growth. This approach is also recognised as having local economic and sustainability benefits for promoting local economic opportunities as well as reducing people's need to travel further afield for work.

Proposals will be expected to submit up-to-date spatial analysis, setting out gaps in the network with consideration around proximity to employment land and Town Centres as part of the assessment.

Childcare is recognised as a barrier to employment as identified in the Employment and Health in Newham Assessment and comments received in the consultation. Policy J4 aims to unlock economic opportunities for all including those experiencing barriers to employment such as those with health needs or caring responsibilities. Recognising this in policy is part of a more inclusive approach to enable more residents' access to high-quality economic opportunities. Via the Council's brokerage, developers are required to work with the Council to enable more local resident employment and training opportunities, including targeted support for those with caring responsibilities. Further to this, where major economic developments are proposed, proposals are required to make an assessment on increased demands for childcare facilities to enable more workers into employment, with the expectation that this is either met by existing local provision or new ancillary facilities. The detail of this assessment is set out in Local Plan Policy CF4 (Education and Childcare Facilities).

We recognise the make-up of Newham's workforce is people who travel out of the borough and those that work in or live and work within the Borough. The Employment Land Review highlights that Newham's self-containment destination is around 33%. As a London borough, this illustrates that Newham sits firmly within the London economic area. However, the policies have been developed to balance the strategic economic role of Newham as well as the local economic role. It does this by enabling new economic developments to come forward as part of the 15 minute network, which reduces the need to travel further afield and supports high-quality business locations to encourage external investment, as well as tackling issues around unemployment with a drive to grow the local economy. This is part of the Community Wealth Building approach and recognises the role of local employment and skill development in J4 to support this ambition, a key component of sustainable development.

Q3. Is there anything missing?

- 2 residents said nothing is missing and 2 residents said they do not know/there are enough responses
- 3 comments, including one from Newham Sixth Form College, said more emphasis on education, skills, and training is missing, including the need to provide career development in Newham, as well as opportunities for graduates, and missing a wider framework to increase skill levels (including access to childcare and affordable workspaces)
- Other elements missing according to residents include: the role of social enterprises in the start-up economy, supporting ethical employers and turning down those with unfair practices such as Amazon, promoting self-employment, attracting investment, and engaging with the community

Officer Response:

We welcome the numbers of representations received to ensure policies create fairer outcomes and higher quality economic opportunities for residents and communities in Newham. This is recognised as a key consideration for all economic developments. The chapter has a dedicated policy J4 to support inclusive growth and delivering community wealth building. The focus of the policy is largely focused on maximising local economic opportunities and securing economic benefits for all Newham residents. It responds to identified economic challenges faced by residents. These include high levels of unemployment (including young people), poor quality of employment opportunities and limited career progression, and the need to better equip residents with training and skills to thrive as part of Newham's inclusive economic future. Policy J4 stipulates that Applicants will be required to proactively work with the Council's brokerage (Our Newham Work) and recognised education providers to increase opportunities for training and job creation (including apprenticeships and placements) to positively contribute to support the economic futures and career development of residents. Policy CF4 also supports new and expanded education facilities to align with growth needs in Newham. Policy J4 aims to secure local job creation at both the construction and end user stage, and contributions for wider skills and training development to improve local job prospects.

Quality of employment is recognised as an issue for Newham and is reflected in the engagement responses. Applications will be expected to demonstrate their commitment to Newham's Business Pledges as a measure of how a proposal aims to support fairer and improved local employment opportunities. Within the pledges, there is a focus on quality of employment (including pay and London Living Wage), fairer terms for local businesses to start up and thrive, the environment, and emphasis on local economic opportunities for all. Whilst planning policy has limited control over internal business operations, Policy J4 is drafted to ensure there is a sufficient assessment and demonstration of proposals for economic development to align with wider Council objectives around a fairer workplace and economy for all.

Q4. What else can we do to support a greener and more inclusive economy?

- 18 comments, from residents, LB Waltham Forest, LB Redbridge, developers, Swifts Planning, and Mayor of London, provided ideas on how to support a greener and more inclusive economy, which included:
 - pop-up spaces for businesses to rent short-term
 - greater use of data
 - incentivising and subsidising greening for businesses
 - accessible locations to reduce need to travel
 - carbon-neutral design
 - reducing business rates
 - working with local green businesses
 - promoting green tech and providing apprenticeships on it
 - promoting green growth in line with the London Plan
 - encouraging businesses to address poor air quality and use green transport
 - promoting a circular economy
 - pushing for community heat pumps
 - working with suppliers that are de-carbonising
- 1 resident recommended to cease building on every piece of available land
- 1 resident suggested being more flexible in the approach to new ideas and 1 other resident suggested working with other boroughs and local institutions
- 1 resident said that residents need to be encouraged to use active travel by improving safety and infrastructure

Officer Response:

We welcome comments for ideas to support a greener economy. Further detail on how these suggestions have been incorporated as part of the green economy objective of this chapter, which is set out in Q1. This included points around the relationship between economic development and improving net zero carbon development, circular economy and support for greener industries and businesses as part of sustainable economic growth.

A principal objective of the Local Plan is to encourage a more sustainable pattern of movement. For the economy, this also means promoting more sustainable modes of transport including servicing and deliveries as part of economic development. This is covered in draft Transport policies T1 (Strategic Transport), T2 (Local Transport), and T4 (servicing a Development)

Q5. What could we do to better protect and support local businesses and allow them to thrive and expand?

- 6 residents mentioned that providing affordable workspaces would help because rents are too high and 1 business owner said that the Council makes it very difficult to buy a business permit
- 13 residents provided suggestions to better support local businesses, including: actively encouraging existing local businesses, activating the high street to create more diverse jobs, active marketing, capping rents for community-led businesses and providing grants, restricting licences to franchises, locating businesses closer to where people spend time, providing incentives to employ residents, and attracting investment
- London City Airport:
 - supports the current Plan's approach in helping a range of existing businesses to invest and in promoting the creation of new businesses
 - said that the economic significance of the Airport as a major economic driver and catalyst for employment should be highlighted
 - stated that it expects to grow and employ a range of jobs after the pandemic to retain the position as one of the borough's largest employers
- Developers said that the Employment Land Review should acknowledge the FEMA, should engage with local businesses, and should think of employment requirements beyond Stratford
- 1 resident said that re-opening the farm would create more employment and training opportunities, proposing to fund the Farm by allowing visitors to stay overnight
- 1 resident suggested Whitehall Place as a micro-business site
- 2 residents said that a high-quality, technical college to provide students with vocational qualifications would result in more employability and better overall opportunities for young people
- 1 resident said the Council should have a team devoted for encouraging investment and another one said it should be welcoming to encourage inward investors
- 1 resident suggested offering grants to local businesses that contribute to community facilities
- 8 comments from residents and developers mentioned how better employment outcomes are needed, including better paid jobs, opportunities for young people, opportunities to work locally, and fairer employers

Officer Response:

The economic policies recognise the balance between supporting strategic and local economic needs. Economic evidence notes that Newham (excluding the LLDC and Royal Docks areas) has lost office floorspace and the policy has been reworded to better protect small-scale office for local businesses within Town Centres. For local businesses, employment designations are protected to support economic growth as well as supporting new economic opportunities within the borough's Town Centres. The audit of employment land provides an up-to-date understanding of the suitability of sites for future economic purposes. The policies set out the framework for investment in Newham, helping to direct economic development to support sustainable economic growth, whilst ensuring investment maximises opportunities to benefit local communities across the borough. Other employment designations are 'employment led', which means that a process will be undertaken to re-provide existing businesses or ensure businesses are sufficiently relocated before redevelopment. For local business clusters seeking redevelopment, all existing floorspace will require 12 months of marketing to ensure that the space is evidenced as unviable prior to any redevelopment. This ensures Newham's local network of employment locations and businesses are protected and not lost through

redevelopment. This all forms part of the overarching ambition for Community Wealth Building to support Newham's local economy.

See Q6 in relation to affordable workspace.

See Q3 for local economic opportunities and policy approaches to create fairer economic outcomes for local residents.

The Employment Land Review notes that Newham sits firmly within the Functional Economic Market Area (FEMA) of London, highlighting that commuter flows out of Newham exceed in-flows. The need figures recognise that Newham sits within a wider FEMA and aims to support job creation within Newham as well as attracting new investment towards key employment locations in Newham. As part of the Employment Land Review process, engagement with the industrial and commercial market was undertaken to align findings with the market view. This engagement has helped shape land designations, typologies of workspace and sectors to support growth. The evidence suggests to plan for the higher industrial economic need figure, to support meeting industrial needs as part of the wider industrial market areas such as the Lea Valley and Thames Gateway in which Newham falls, including overall London's industrial needs. This approach also reflects the context for the release of Strategic Industrial Locations well above historical benchmark levels, as set out in the London Industrial Land Demand Study (2017).

We acknowledge London City Airport's support for policies that seek to continue further investment in existing business growth in Newham alongside supporting new floorspace and jobs through the creation of new business workspaces. The policies set the framework for this investment and approach to support economic growth, including creating employment opportunities for major employers in the borough.

Any employment and training opportunities will be required for all economic development. This approach aligns with Community Wealth Building as set out in J4. This is in response to securing both new floorspace and jobs with maximum benefit to Newham's economy. This includes skills, training and job creation.

Q6. How can we maximise the supply and delivery of affordable workspace in the borough?

- 24 comments, including ones from Friends of Queens Market and LB Waltham Forest, provided suggestions on how to maximise affordable workspaces, including:
 - ensuring they are integrated in planning regulations
 - locating them near eateries, childcare, and residents
 - approaching large workspace providers
 - prioritising start-ups, using empty spaces
 - capping rents
 - securing workspaces via s106
 - making them a requirement for new developments
 - consulting with existing local businesses
 - diversifying existing spaces to provide flexibility in uses
 - promoting meanwhile uses
 - prioritising green businesses
- Developers showed concerns over the fact that if more affordable workspace is provided, less affordable housing will be viable, and moreover, they said that further evidence is needed because no affordable workspace has been provided yet and a robust justification is needed
- Developers said that affordable workspaces can be provided within 15 minute neighbourhoods in small sites, but some will have to be located in large sites elsewhere
- The Mayor of London and LBN Public Health mentioned that affordable workspace need to be delivered, but developers showed concerns over the viability
- 1 resident said that residents working from home should be supported with appropriate office equipment and with office space
- Both developers and residents suggested learning lessons from good and bad examples such as the SEGRO Innovation Centre/Enterprise Quarter Rainham and ABP's RAD

Officer Response:

London Plan Policy E3 states that more detailed Affordable Workspace policies are subject to local evidence around need and viability. Whilst the economic technical evidence was inconclusive on the immediate need for affordable workspace in Newham, engagement responses have highlighted issues around rent levels and access to space for businesses to start up. It is outside the scope of policy to cap rents. However the policies have been designed to support a range of workspace types in a variety of locations (with different values) to meet a diverse range of needs. This includes policy J4, which supports affordable workspaces (as per the London Plan definition) in certain locations (strategic sites and employment designations) as well as within non-designated employment locations, providing this opportunity is maximised and supports the ambitions of the 15 minute network. All applications proposing affordable workspace will be subject to demonstrating there is a need, and the design of spaces is flexible to meet a range of sectors. This is in line with the London Plan to secure more affordable spaces (SME, cultural, light industrial) and deliver a typology of spaces to meet occupiers' requirements, secured through a development legal agreement. As such, there is sufficient flexibility in the policy to enable affordable workspace to come forward, recognising this is a component of the diverse range of workspaces that the policy supports to enable economic growth

and meet local needs. For major proposals with a component of affordable workspace, the policy stipulates viability should be factored in whilst discussing this at the earliest point with Newham's Economic Regeneration team. The policy also supports the delivery of flexible workspaces in less expensive locations such as edge of Town Centre locations, recognising these are important to local communities and have good public transport accessibility.

See Q7 around working from home.

See response to Q3 around the role of all employment and the 15 minute network.

J1 outlines that all economic development proposing commercial floorspace is required via an Employment Strategy (with reference to up-to-date demand evidence) to demonstrate that the floorspace they are proposing meets evidenced demand. As such, this approach provides a sufficient assessment of proposed economic developments to ensure the use, typology and outputs from development meet local and strategic needs. This process de-risks the possibilities of future vacancies or space that is not suited to the market and occupier needs.

Q7. How can economic policies better support changing work patterns such as working from home and/or remote working locally?

- 12 comments, both from residents and developers, mentioned ways to improve work patterns, including: creating flexible community co-working spaces and adapting homes to make them suitable for working from home
- 3 residents mentioned how there needs to be better digital infrastructure to accommodate remote working, including improved broadband, better Wi-Fi in public spaces, and provision of free local internet hubs with IT equipment
- 1 resident said that schools should provide services to support children and families during out of hours
- 2 residents said they do not know

Officer Response:

The Council welcome responses around changing work patterns and recognises it as an important consideration for economic policy and sustainable economic growth. Employment evidence acknowledges that long-term changes to work patterns as a result of the pandemic remain uncertain, and the policies have been framed around the Council's Reorientation and Recovery Strategy, setting out Newham's approach to tackling key issues faced by the borough. The Economy policies have been drafted with sufficient flexibility to enable proposed employment floorspace to respond to economic and market changes throughout the Plan period. In particular, the support for a range of suitable planning uses on employment land avoids rigidity and provides sufficient flexibility in policy for proposals to demonstrate appropriate types of employment uses on employment land. Taking a demand-led approach requires proposals to respond to the most up-to-date economic evidence as part of any submission, including demand evidence set out in the Employment Land Review. The requirement for all economic developments (including mixed use and on strategic sites) to submit an Economic Strategy provides a sufficient framework to provide robust and up-to-date evidence at the

point of a planning submission, setting out how demand is being met and how the typology of spaces meet occupiers needs. Spatially, the plan enables the creation of new employment locations to be established as part of the 15 minute network as well as support for economic development within Town Centres and Micro Business Areas for co-working. The emphasis to support economic growth across the wide network of designated and non-designated employment spaces is in response to the shift towards more localised working arrangements, whilst promoting the most accessible locations for new employment opportunities. This also has wider Town and Local Centre economic benefits, a component of the Community Wealth Building approach. Draft Housing policy H1 also encourages flexibility in housing design to better enable working from home through flexible layouts.

See response to Q1.

Policy CF4 ensures that schools and higher education facilities are designed and managed to meet a variety of needs, including community uses outside of core hours. However, Draft Policy J4 encourages developments to work with major education providers to support learning and skills development as a fundamental basis of the future economy.

Other themes:

- 17 comments from developers and residents mentioned employment land, including: co-location, the need to protect existing industrial land, the proposal to extend London Industrial Park SIL onto Beckton Alps, intensification, viability, and accessible locations for small-scale uses
- London City Airport suggested that the newly-opened Elizabeth Line will provide economic opportunities in the area and residents highlighted the importance of transport services to support economic opportunities

Officer Response:

Newham welcomes comments from both residents and developers, recognising the importance of employment land and the increasing need to protect industrial land for economic purposes. These comments align with the economic evidence, which concluded that protection of employment land is required to meet economic need. This conclusion is in response to a shortage of industrial land across London, and recommends a policy approach that resists any further release, as a principle to intensify employment floorspace and make the most efficient use of land for economic purposes. The need for industrial floorspace (including warehousing and logistics) has grown significantly in recent years, with evidence identifying a need to deliver around 330,000m² by 2038. This figure reflects the shortage of industrial land across London, including supporting sub-regional needs.

Co-location of economic uses with residential is encouraged on Local Mixed Use Areas and Micro Business Opportunity Areas only, and sets out a criteria to better integrate these uses in design and scheme layouts. Proposals for employment uses are expected to meet neighbourliness criteria as set out in the Design policy, including application for agent of change for both residential and non-residential uses. The findings from the Employment Land Review note that to meet economic need, well-performing industrial land has to be sufficiently protected to enable core industrial and

warehousing in demand to come forward. As such, co-location with residential is not supported in these locations. This is in response to the high levels of demand and requirement for land for industrial development in the borough, and to ensure the largest industrial sites support opportunities to deliver increased capacity to meet economic need.

Proposals for industrial development on protected Greenspace would not be in accordance with the Draft Local Plan. Whilst the shortage of industrial land is recognised as an issue, the policy has been informed by economic evidence to meet need principally through industrial intensification on existing designated land, as well as exploring the potential for retail and leisure parks for future industrial uses. This is the evidenced strategy as part of the economic policies.

London City Airport is recognised as a major employer in the borough. The role of infrastructure (including transport) is an important component to improving economic opportunities, particularly for local residents.

Below are the responses provided in the un-facilitated and facilitated workshops.

OUR ECONOMY



Discussion Summary

- Participants were broadly supportive of the proposals outlined in the Issues and Options paper. The conversation focused more on the **affordable workspace provision, incentivising a greener economy, and supporting a data driven and digital economy.**
- A key question the group considered was **should Newham focus on creating jobs in the green/digital economy vs. ensuring there is good work for all residents now?** Green jobs and the greening of the economy were seen as vital but there were concerns about having the capacity to give residents the skills they needed for these jobs.
- There were also a range of opinions on whether Newham could follow a mixed model (supporting jobs in a range of different sectors) or if it needed to focus more on one or two priority areas. There was broad agreement that Newham needed to ensure that there was **good work for our residents now** (including manufacturing jobs) as well as **ensuring that Newham residents were able to benefit from new economic opportunities.**
- The issue of **shared workspace** was also discussed in detail. One of the key elements of these discussions was thinking about the type of workspace provided and how genuinely affordable it could be. There was a desire from the group **not to just be providing spaces for desk-based working**, with more space for artists or small businesses (e.g. textiles.) One issue raised related to the **need for longer leases** for this type of space. Small businesses (or providers) can't invest in the infrastructure needed if there isn't that certainty. There was also a **desire to ensure that these workspaces were across Newham and not just in hubs like Stratford.**
- Although the workshop was focused on how the local plan can be used to support 'Our Economy', it was also clear that **the Council needs to work with partners across the system to ensure success.** This included working with education providers (like Newham College) to ensure that we are upskilling residents now, for the jobs we believe will exist in the future.
- One of the key areas of agreement was that planning policy related to Our Economy needed to **consider social value, and not just monetary value of community wealth building**, if we are to successfully meet the ambitions of our residents and businesses in Newham.

From the information you have had so far, how do you feel about the proposals?



Feedback	Percentage
Great	0%
Good	100%
Not bad	0%
More to do	0%

Proposals discussed

1. Identify sufficient employment land in the right locations to support growth sectors	4. Become more prescriptive on affordable workspace provision
2. Including employment space as an important contributors to inclusive, 15 minute neighbourhoods	5. Incentivising a greener economy
3. Explore ways to ensure new commercial development secures a fair deal and good growth for Newham	6. Supporting a data driven and digital economy

WE ARE NEWHAM.

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People at the Heart of Everything We Do

Workshop Theme and date	Jamboard Summary
Economy – 20 th November 2021	Sufficient employment land in the right locations to support growth sectors and including employment space as an important contributor to 15 min neighbourhoods • Cultural spaces and businesses in Stratford and emerging in the south - but limited geographically - how do we spread them equitably. • Could we promote co-working spaces in neighbourhoods. • Specialist hubs in Fish island – especially for creative industries - how do we optimise?
	Changing nature of work / data driven economy • How do we optimise opportunities for our digital natives - young people in the borough - but also make sure do things in the real world. Not just focusing on one area. • How do we help people cope with age of disruption - as jobs available will change fast. • We have to be responsive and enabling of fast growth sectors - e.g. data and digital that the UK government has emphasised (3rd to China and USA). We want Newham as a whole to benefit - not just clusters. Using economic investment as a place-making tool. • Have to strongly make the case for Newham within the wider regional and national strategies especially on the growth of digital – to benefit from that investment and focus. • Need to embed a lifelong learning culture - including skills • Not just about digital - we also need to make things - of high-quality but also lower price and easy access. Moreover, how we fix things. Need spaces and opportunities for that. There was an inventors club - UEL hosted it. Enabling that is crucial - bring together people with ideas - workshop space with equipment.
	Explore ways to ensure new commercial development secures a fair deal and good growth for Newham • We do welcome investment and development - but has to work for local people. We have been baking in the Inclusive Economy intentions into the Olympic park and pushing the Royal Docks economic purpose has to benefit local people. • London College of Fashion coming to Stratford - how do we link it to Green Street - and local, predominately female workers. To create secure job opportunities. • For example could we host London fashion week at excel! • How do we drive the use of the London Living wage. • Making use of the local partners like universities and large businesses to put residents first. • East London was the heart of industry - more than Birmingham - in its heyday. Concern post dock closures - how do we give people places to spend money locally - both residents but also visitors. So we can employ local people - e.g. Tesco at Gallions Reach. • Key is helping create connections and a shared economy between businesses. • Need to prioritise local businesses/entrepreneurs for Local Authority contracts. Green Jobs / Green Zones

	• Climate crisis is a massive challenge - but also opportunities to create jobs – for example repair spaces in the high street. • Green economy - need to bake in a just transition - so no one is marginalised. How do we deliver green workspace in the 15 minute neighbourhoods so everyone has access to it? Not just located in particular areas - especially in areas like Royal Docks - which can feel alienating International Focus • We are unique in that we have an airport and Dockside is one of the first things people see when they land. How can we capitalise on that? How do we revive the historic international nature of the Docks? The airport is not just negative. • We need to better leverage our links. We have languages spoken that are connected to countries around the world. Create trade ties - but doing it sustainably. • Many international students come and live in Newham, how do we build greater connections with them to build employment opportunities? For example, "twinning" the borough with more cities? Cultural/knowledge exchanges. Championing local talent/skills
Economy – 29th November 2021	Sufficient employment land in the right locations to support growth sectors • We need space and to enable a variety of industries. • Role of Town Centres is crucial but we should not ignore industrial land - especially as so much has been lost to housing. It is a finite resource and in Newham, it is viable – due to good connections. • Do we need all types of industries? Do all industries bring benefits? Do some hinder the 15 minute city? Is it about getting the right designations in the right locations? • We still need industry in towns - otherwise they become sterile • Industrial land is of increasing value. • Post covid response - how do we cater for a wide range of industries and employers? Can we use Council land to appropriately support emerging industries? • Policy needs to acknowledge there are big land users within the employment space - where do these users go? Including employment space as an important contributor to 15 min neighbourhoods • Can industrial land be part of the 15 minute cities - there is more than one type of industrial use. • Seeing a possible erosion of uses - no longer need such distinction between employment and residential areas. • Post covid - community is ever more important - including the community in new spaces and developments – both workspace and residential. But need to ensure operation and management is in place - to keep them going Incentivising a greener economy • Sustainable transport is key. How do we improve the existing infrastructure - e.g. the Greenway - how do we make more use of it? • How can employment spaces and policies support green spaces?

	What will these standards be in Green Zones? How will we deliver this? If we meet those standards, what happens?
	Become more prescriptive on affordable workspace Affordable workspace is needed - but need to consider the viability. Need space for small businesses and start-ups.
	Supporting a data driven and digital economy - Digital - do we support the creation and support of jobs which can happen anywhere in the world? How does this deliver benefits for Newham? - Is proximity still key for communication and ongoing engagement in a post covid world? - Digital is not the only answer. Other economic sectors are growing and residents have other skills. Making sure there is a wide mix.
	Explore ways to ensure new commercial development secures a fair deal and good growth for Newham - Knowledge sharing is key - useful to be able to meet interested young people, networking, creating opportunities to match young people and highly skilled jobs. So need skilled jobs to stay in the borough - and business owners want to help young people to access those roles. - Business owners want to be able to connect to young people who are interested in these roles. Need conduits so there is an awareness of the roles. - If the Council doesn't already, it might be worth organising careers events every now and then - Do we need hubs and buildings to support this networking and connections to happen? - Industry, education, Council - how can they work together for young people? - The government are trying to force T-levels into colleges with a threat of abolishing BTECs. These T Levels need employers to engage with colleges to provide 45 days of work placements, which almost all colleges will struggle with. It might be worth the Council joining forces with colleges to help engage with industry
	Workforce of the future It would be interesting to try to understand what the workforce of the future Newham will look like. Because it seems many of our young people are being/will be priced out of the Newham housing market. What challenges does this bring?

Officer Response:

We welcome the feedback on economic policies in the workshops. Over the Plan period, Newham's economy and jobs are expected to grow. The Employment Land Review evidence underpins the policies to identify the quantity of land to meet economic need (a requirement by national policy). The Review includes a qualitative audit of employment locations to ensure they are fit for purpose to continue to attract investment for a diverse range of economic uses and meet growth sector needs. With creating a diverse economy – an objective of Policy J1 – this policy directs different sectors to key employment locations

where businesses are envisaged to thrive and to ensure future economic growth meets occupier and operational needs for businesses. This is key component of securing sustainable development.

In pursuit of a modern and inclusive economy, the role of digital is recognised through its support for enabling workspaces within digital, high technology and the data sector on employment land. This is set out in Policy J1 as part of the priority uses, recognising the opportunity particularly in the Royal Docks to grow the digital and technology sectors. Whilst the policies encourage new floorspace in the digital and data sectors, a key tenet of the ambition of the chapter is to secure new floorspace as well as create high-quality local jobs. This is part of the Community Wealth Building approach set out in J4 to ensure floorspace is not delivered at the expense of local economic benefit. This also responds to key economic challenges faced by residents, recognising barrier to employment, ensuring young people have a high-quality economic future and that new businesses 'buy into' the Community Wealth Building objective.

The demand-led nature of the policies has been designed to be flexible enough to respond to changes in the economy and, where justified, support new floorspace in sectors evidenced to grow. Policy J4 sets out the policy framework for an inclusive economy, which through a range of approaches aims to maximise economic opportunities through education, skill development and training to create employment opportunities for local residents. This has been informed by Newham's Recovery strategy to tackle inequality in Newham and proposes that major economic development work with the Council's employment brokerage and education providers to help support and equip residents including young people with skills, training and knowledge into employment.

See response to Q1, Q2 and Q3 around inclusive and fair employment opportunities, including the London Living Wage, education and training. Policy J4 is principally about inclusivity and equality within the economy, which aligns with the Good Growth Objective 1 of the London Plan around building strong and inclusive communities and overarching Local Plan objectives to secure a fairer Newham set out in Draft Local Plan Policy BFN1.

The importance of inward investment is key to economic growth. Whilst direct links and exchanges with other cities falls outside of the scope of planning policy, the policies recognise the important economic role Newham plays, regionally in London and more internationally, with a number of major businesses particularly in the food and drink sector which support Newham's local employment. Whilst Newham's rich industrial heritage is recognised, the policy aims to continue this trend to protect strong employment land to support the delivery of modern workspaces and attract investment to help deliver economic objectives. This includes investment that buys into community wealth building and is inclusive of Newham's economic vision. Establishing links with the borough's major education establishments, J4 also supports the development of skills and training to equip young residents for high-quality employment in the future.

See commentary in 'Other themes' under Co-location for a response to the importance of protecting industrial land for economic uses only.

See response to Q3 around the role of all employment and the 15 minute network.

Officers welcome recognition of the borough's Town Centres and employment locations to support industries and economic growth. The key evidence that underpins the demand for land across a range of sectors is the Employment Land Review. This sets out the market view of emerging growth sectors, objectively assesses the demand for land in Newham and recommends a strategy to best meet economic need. This is a requirement of national policy. An audit of the borough's employment locations also provides qualitative analysis to ensure employment locations are fit for purpose and will continue to attract investment within the Plan period. Policy J1 sets out where particular industries will be located, informed by the Employment Land Review. This to ensure we direct employment uses to locations which meet operational needs, as this forms part of the overarching strategy of the Plan. The evidence recognises the shortage of industrial land in Newham, and the proposed policies seek to protect these locations and intensify floorspace to support needs. It also notes that industrial development is viable in Newham and is an important land resource to meet the economic needs for London. The economic policies also recognise the role of locations like Town Centres and edge of centre business locations for a range of needs which have good public transport accessibility to support new workspaces close to centres. Policy J4 aligns with the Council's broad Community Wealth Building objectives to maximise local economic benefits from development such as local jobs, childcare and support for those unable to access employment. This will be required for all economic developments in Newham.

See response to Q1 around the green economy and jobs. Policies around sustainable travel and infrastructure are set out in draft Policies T1-T4, including greener travel from economic development.

See response to Q6 around affordable workspace. Policy J4 is drafted to consider viability in any scheme proposing this type of workspace.

Q1. Do you agree with the proposed changes?

- 27 comments, including those from the NHS Urban Development Unit, LB Waltham Forest, LB Redbridge, residents, and developers, agree with the proposed changes, specifically supporting the delivery of affordable housing, supporting the improvement of residents' physical and mental health through design, supporting the delivery of family-sized homes, supporting the acknowledgement of viability constraints including Brexit and Covid-19, and supporting the delivery of a range of housing types and tenures
- 3 residents disagree with the proposals, one of them for not being sufficiently creative
- 2 residents neither agree nor disagree, explaining that there needs to be a focus on homes having access to facilities, and on reducing developers' influence over housing delivery

Officer Response:

We recognise the broad support for the changes proposed within the Issues and Options chapter on homes. Our evidence suggests our greatest housing needs over the plan period will be for affordable homes and three-bed homes, and as such, the delivery of these homes will be prioritised in the plan. The Council is committed to delivering affordable, high-quality homes that meet the different housing needs of our residents. These aspirations are reflected in the Draft Local Plan, which has proposed:

- A strategic affordable housing target of 50%, delivered through the London Plan's 'threshold approach', which seeks a minimum of 35% affordable housing and 50% on public sector land or industrial sites considered suitable for residential development (Policy H3).
- Social rent homes being prioritised in the delivery of affordable homes (Policy H3.2.b).
- A new housing design policy that looks to improve the quality of new housing (Policy H11)
- A minimum target of family homes (with three or more beds) on new developments (Policy H4.2)
- Requirements that developments should deliver a mix of housing types, sizes and tenures (Policy H4.1).

We acknowledge the criticisms of the proposals around lack of creativity, a need for further emphasis on homes having access to facilities and the need to reduce developers influence over housing delivery. The Local Plan is required to be in broad conformity with the London Plan and national planning policy. In some instances, this can limit our ability to introduce more radical policy changes. Housing delivery is also often dependent on private developers bringing forward land for redevelopment, with new policies needing to be 'viable' for developers to deliver. This can be challenging in a context of economic uncertainty or changes, for example as a result of the COVID-19 pandemic or Brexit. However, the requirements in the Draft Local Plan policies help us to ensure the delivery of homes are aligned with our residents' needs. The Draft Local Plan also supports the concept of 15 minute neighbourhoods, with homes provided access to relevant supporting amenities and facilities within a 15 minute travelling distance. This concept that underpins many of the Local Plan's policies is set out in Policy BFN1.

Q2. Are there other changes we should consider?

- 3 residents said no other changes should be considered
- 5 responses from residents, developers, Home Builders Federation, and Mayor of London, mentioned affordability as something that should also be considered, specifically the introduction of size-mix requirements for low cost rent homes, the support for delivering more affordable housing, the support for the London Plan's threshold approach, acknowledgement that viability means a need for housing trade-offs, and the opposition to losing existing social rent homes
- 9 comments, including those from residents and developers, mentioned design as something that should also be considered, with examples such as supporting agents of change principles and co-location with employment, supporting better quality open space adjacent to developments, supporting high-quality design in terms of space standards, reducing noise pollution and overlooking, improving the quality of private rentals, supporting better quality facilities within housing, and supporting measures for more sustainable housing to tackle the climate emergency
- 14 responses, including that of Climate You Change, mentioned the need to consider families, in ways such as supporting the conversion of family dwellings and supporting the delivery of family-sized homes, however developers and TfL also support the delivery of one and two-bedroom homes as well as the reduction of 3+ bed targets
- 5 comments, including two from the Mayor of London, referred to the need to meet targets in ways such as meeting London's strategic housing need, supporting more council-led and not-for-profit developments, supporting retrofits, and supporting a stepped housing trajectory
- 3 comments from residents and the Mayor of London said that housing mix should be considered further in ways such as having a size-mix policy, supporting home ownership aspirations, and restricting the role of the private rented sector
- TfL said that housing should be delivered in areas with good public transport connectivity
- 1 resident voiced their support toward the delivery of housing for unsheltered people
- 1 other resident voiced concerns over housing density
- Developers said that the housing target should be 48,820 as per the New Standard Methodology

Officer Response:

We acknowledge the range of suggested changes provided around affordable housing, the design and density of housing developments, the size of homes being delivered, ensuring homes meet London's wider housing needs and aspirations, housing connectivity to infrastructure, addressing the housing needs of unsheltered people and meeting our housing target.

We are committed to optimising the delivery of affordable homes, particularly social rent units. Our evidence of housing needs shows that 54% of our housing need across the Plan period will be for affordable homes, with 66% of this affordable need being for social rent homes. Our affordable housing target, which has been viability tested, aligns with the 'threshold approach' set out within the London Plan, which we anticipate will encourage the delivery of more affordable homes as seen across London since its introduction through the 2021 London Plan. Policy H3.2 sets a tenure mix target that favours the delivery of social rent housing. The policy also allows for the provision of affordable home ownership units as part of a development's wider unit mix. Delivering more affordable homes aligned with need will help to address high levels of homelessness in the borough, and will also present an opportunity to build more homes for key workers.

We are not introducing a size mix requirement for different tenures of affordable housing, but instead require developers to consult our latest evidence of housing need in the affordable housing policy's implementation text. In addition to this, policy H2.1 protects existing affordable housing floorspace, including requiring the replacement of social rent floorspace in new developments with an equivalent amount of floorspace in the same tenure.

Newham's latest evidence of housing needs shows that we have a need for 59% of the new homes we deliver over the plan period being family-sized (three or more bedrooms). Accordingly, our housing mix policy, which encourages a mix of housing types, sets a family housing target that aligns with evidence on the maximum amount of family housing that is viable for most schemes to deliver across the Borough (Policy H4.2). Policy H2.2 also protects family-sized homes from conversion, unless developments meet the exceptional circumstances set out in parts 3 to 5 of the policy. While acknowledging the support for lowering family targets and encouraging smaller units, our housing mix policy limits the delivery of one-bedroom and studio units. This is because one-bedroom dwellings only form 12% of our housing need, as shown in our housing needs evidence base.

Alongside delivering different types and sizes of dwellings to meet needs, we also want to ensure that new homes delivered in the borough are of a high-quality. Alongside the policies in the London Plan, such as minimum space and private amenity standards, the Housing policies introduce new design requirements for different types of housing under Policy H11. These apply to all types and tenures of housing, including rented homes. Other factors influencing the quality and enjoyment of housing, including access to open spaces (Policy GWS.1), high-quality cycling and waste facilities (Policies T3.3 & W3.2), thermal insulation (Policy CE2.2) and reducing noise and overlooking impacts (Policy D7.4), should be assessed in the round against the requirements of other Local Plan policies.

Assessments of the appropriateness of co-location of housing with industrial uses and options for the retrofit of existing buildings are considered in the Economy and Climate Emergency chapters of the Plan. Locations suitable for co-location are set out in Policies J2.3, J1.5 and J1.6, while retrofit is strongly encouraged under Policy CE5.

We have proposed to meet our ambitious London Plan housing target. The 'standard method' for calculating housing need has not been considered given our need to be in general conformity with the London Plan. While meeting our London Plan target will result in a high density of housing delivery within the borough, delivery of our housing target helps to meet London's wider housing needs. While a great deal of housing will be delivered on land owned and developed by private developers, the policy encourages the delivery of homes, and in particular affordable housing, on land within public ownership. The appropriate density of schemes is assessed using the design-led approach set out in the London Plan, which consider factors such as the connectivity of a site to public transport, open space provision, the appropriate location of uses and local context. The phasing of housing delivery over the Plan period has been informed by both historic delivery trends and information from landowners.

Q3. Is there anything missing?

- 1 resident said nothing is missing
- 1 resident said that there needs to be more consideration toward supporting single and young people into affordable housing and that there needs to be more of it overall
- 3 residents said that there is not enough said about design; it needs to better support quality biodiversity in developments, high-quality design, and upgrading housing to address the climate emergency
- 6 comments, from both residents and developers, showed concerns over meeting targets, in terms of low housing delivery, building in brownfield sites, retrofitting, availability and delivery of council-owned housing, and reducing developers' influence
- 1 resident said that there is not enough detail on specialist accommodation, emphasising the need to restrict HMOs, the need to support charities that provide specialist accommodation, and the need to deliver houses for people with learning difficulties
- Bow Creek Moorings voiced the need to consider boat dwellers in the policy given the rapid growth in people living in boats
- 11 comments from residents, LBN Public Health, Mayor of London, and Home Builders Federation, mentioned facilities, including how housing should facilitate community wealth building and better access to facilities in the surrounding environment should be provided, such as a Centre for Independent Living

Officer Response:

We acknowledge that housing delivery in the Borough in previous years has fallen below our housing target in the London Plan, and this has raised concerns around Newham meeting its housing target. Our housing target in the Draft Local Plan is largely based on capacity modelling of site allocations (in line with the London Plan's design-led approach) and existing planning consents, as well as taking into consideration historic delivery trends and discussions with landowners on expected delivery timeframes. The vast majority of our housing target is anticipated to be delivered on brownfield land. We consider our housing target in Policy H1 is deliverable and based on up-to-date evidence. While a proportion of housing delivery will be delivered on Council-owned land, a majority of housing delivery will be brought forward by private developers. This is due to much available land being in private ownership and the resources these developers are able to invest in the delivery of new homes. Policies in the Draft Local Plan also support retrofit and refurbishment of existing homes, as set out in policy CE5 (Retrofit and the Circular Economy).

We recognise the significant challenges young people in the borough face when trying to access housing. The majority of our housing need is for 3-bedroom homes for families, and as such, the policies in the plan have sought to balance the need to protect family homes from conversion with the need to deliver homes for young and single people. This includes allowing the conversion of family housing in limited circumstances to HMOs, and ensuring that new HMOs delivered in Newham are let at the Local Housing Allowance shared accommodation rate and meet relevant quality standards set out in Policy H11. Our approach to delivering more affordable housing overall is set out in response to the question on other changes the plan should consider (Q2). We will prioritise the delivery of affordable housing on all major sites delivering new homes, helping to facilitate the Council's Community Wealth Building Strategy principles on improving housing, health and air quality.

The lack of detail within the Issues and Options document on specialist housing is acknowledged. Our new policies on specialist accommodation support the provision of different types of specialist accommodation where accommodation is in appropriate locations with access to services and facilities, meets local need and is of a high-quality. Policy GWS.2 sets out support for residential and visitor moorings outside of employment locations, subject to quality considerations including maintaining openness of the water and protecting surrounding amenity. While we cannot require particular organisations or supporting facilities to operate from Newham, the specialist housing policy will provide support for supporting community facilities where they meet local needs and comply with relevant Town Centre and community facilities policies.

Concerns around lack of detail on housing design have been addressed through the Plan's new policy on Housing Design Quality (H11). Some matters related to high-quality design, such as improved biodiversity and upgrading housing to address the climate emergency are supported by policies in the Green and Water Spaces and Climate emergency chapters of the new Plan (Policies GWS3 and CE5).

Q4. What do you think the main priority for housing delivery should be?

- 27 comments from residents, LB Waltham Forest, and Fossil Free Newham, said that the priority should be the delivery of genuinely affordable housing, especially for families and unsheltered people, as well as affordability of the private rental sector and service charges
- 49 comments from residents said that the priority should be using high-quality design in developments, specifically alluding to:
 - decent space standards
 - providing open space next to developments
 - addressing noise pollution
 - addressing safety
 - addressing over-crowdedness/high density
 - using sustainable methods and materials that address the climate emergency
 - improving the maintenance of the existing housing stock
 - co-production with residents
 - using design that promotes health and wellbeing
 - providing design that requires less energy usage to address fuel poverty
- 2 residents said that housing should prioritise the delivery of facilities that promote community wealth building
- 2 residents said that the priority should be the location of new developments
- 9 comments, from residents and Fossil Free Newham, said that the priority should be to meet housing targets through more efficient uses of existing housing stock, through supporting Newham and the LLDC housing need being considered collectively, and through supporting the delivery of a range of housing sizes, types, and tenures
- 2 residents said that specialist accommodation should be prioritised, specifically to house unsheltered people and restrict HMOs
- 1 resident said that all issues should be treated equally

Officer Response:

We acknowledge the breadth of issues residents have asked us to prioritise in the Local Plan. In particular, respondents support prioritising the delivery of high-quality and affordable homes. As per our response to Q2, evidence of housing need clearly demonstrates the need to deliver more affordable homes in the borough, in particular 3-bedroom affordable homes and social rent homes. We will continue to prioritise the delivery of affordable housing in new developments above other infrastructure requirements and employment obligations (Policy BFN4.3). The delivery of affordable homes through Policy H3 in turn will help to support the *Housing, Health and Air Quality* principle of Newham's Community Wealth Building agenda.

Concerns raised over the affordability of the Private Rented Sector and service charges have been addressed through new policies, including:

- H5.2 and H5.3, which require affordable housing delivery on Build to Rent schemes.
- H9.4 and H9.5, which require low cost rents for Houses in Multiple Occupation (HMOs) and affordable housing for Large-Scale Purpose-Built Shared Living developments.
- H11.6, which requires membership models for services and facilities in new developments, with access for residents living in affordable accommodation being of a comparable cost to using a Council facility.

As per our response to comments on whether people agree with the proposed policy changes (Q1), a new policy supports the delivery of a mix of dwelling sizes and types. Policy H1.1.c supports the delivery of homes on sites that are not allocated for other uses in the Plan, while more specific locational requirements are stipulated for forms of specialist accommodation that may require access to supporting facilities and/or infrastructure.

We acknowledge residents' concerns on the density of new developments coming forward. If we are to meet the borough's high housing target, which includes the part of the borough administered by the London Legacy Development Corporation, then there will be a need to optimise density on land suitable for housing delivery. Newham has a strategic role in London, in that we need to deliver homes to meet both the borough's and London's wider housing needs. As per the response to Q2, appropriate density of housing schemes will be assessed in accordance with the design-led approach.

The Draft Local Plan policies have also sought to balance the need to protect family homes with the need to provide accommodation for the many people in the borough who are unsheltered or living in temporary accommodation. Accordingly, the Draft Local Plan's Policy H2 has introduced an exception that allows for the conversion of family homes to HMOs where these meet the needs of unsheltered people and care leavers in the borough. Notwithstanding this exception, conversions of family dwelling houses to HMOs are generally resisted in the housing policies, unless they meet the exceptions set out in Policy H2.

The Draft Local Plan also contains a new policy on the quality of housing developments (Policy H11). The policy introduces design requirements that supplement existing requirements in the London Plan (for example, space standards). These include ensuring new homes provide alternative aspects on homes fronting poor external conditions such as high levels of noise and poor visual amenity and providing

minimum levels of communal indoor and outdoor spaces. It is anticipated these requirements will have positive outcomes for resident's physical and mental health.

Other matters related to the design of dwellings are addressed in the Design and Climate Emergency chapters of the Draft Plan, such as policies concerning safety (D1.3), use of robust materials that can be modified, adapted or retrofitted (D1.1j and CE3.2), promotion of circular economy principles in the construction of new homes and thermal energy efficiency (CE2.2).

The principles of co-design with local residents and providing 15 minute neighbourhoods, with homes provided access to relevant supporting amenities and facilities, are set out in Policies BFN1 and BFN2. In particular, the 15 minute neighbourhood principle that crosscuts a number of Local Plan chapters will help to ensure that homes are located in proximity to supporting facilities and infrastructure.

Q5. What could improve the quality of housing provision within the borough?

- 2 residents said that housing provision could be improved by reducing densities
- 17 comments, from residents, LB Waltham Forest, developers, and Port of London Authority, suggested that the quality of housing provision could improve through higher quality design, such as improving space standards, promoting agent of change principles and successful co-location, building homes to last, addressing noise pollution, maintaining quality design in the private rented sector, addressing mental and physical health through design, using environmentally-friendly design and materials, and overall improving both the internal and external design
- 8 comments said that quality of housing could improve through better facilities, such as access to amenities and community facilities and proximity to transport
- 5 residents and developers mentioned that housing provision would improve if targets were met, such as promoting new builds and retrofits, and supporting a design-led approach
- There were 3 residents that said that size and tenure mix would improve housing provision, in order to meet the needs of young and single people, as well as reduce overcrowding, and promote accessible and adaptable homes

Officer Response:

We note the range of suggestions for improving the quality of homes in the borough, in particular the emphasis on well-designed homes that are located close to local facilities and improve mental and physical wellbeing. While the Draft Local Plan policies have not introduced additional space standards, Policy H11 sets out a number of design requirements for new homes. These include designing for alternative furniture layouts, providing alternative aspects where homes face onto poor external conditions (for example noise) and providing wide circulation spaces to allow for social interaction (see Policy H11.1a-c). Standards around the design and layout of new homes apply to all forms of accommodation, which should help to raise quality standards in the private rented sector as well as the build for sale market. The policy also includes requirements for the delivery of accessible and adaptable housing for people who use wheelchairs (Policy H11.7-11). These requirements under Policy H11 should collectively help to ensure that new homes help to improve residents' physical and mental health.

The suitability of co-location is discussed above in relation to other changes the Local Plan should consider (see Q2). The issue of neighbourliness and ensuring agent of change principles are adhered to is considered in Policy D7. Standards for energy efficiency of housing are set out under Policy CE2, while Policy CE5 strongly encourages the retrofit of new homes. Policy CE3 seeks to minimise energy and waste in the construction of new developments. Policy D1.1.j also requires that new housing developments use high-quality and robust detailing and materials, which will help to support the lifespan of new housing developments.

As set out in the response to Q3, our housing target is considered achievable, with site allocations underpinned by detailed modelling of sites' capacity for housing. The delivery of new homes will be optimised on sites brought forward for planning permission, and will be considered using the London Plan's design-led approach, which considers the design and layout of schemes and connectivity of a site to public transport. The approach will be balanced with considerations of whether retrofitting existing homes is suitable on sites where homes are already in situ, as per the requirements of Local Plan Policy CE5 and London Plan Policy H7. Concerns raised through the consultation about reducing density and homes having access to sufficient amenities and facilities have been responded to at Q4.

The policies in the Draft Local Plan support the delivery of a mix of homes. The need to balance family housing delivery with homes for single and young people is addressed in the response to comments on what is missing in the new housing policies (Q3). Delivering more affordable homes aligned with our needs will help to address longstanding issues of overcrowding within the borough.

Q6. Is there anything else we should be aware of when developing more tailored policies for different types of supported and specialist accommodation?

- 2 residents said that the current policy on supported and specialist housing is sufficient
- 6 comments, including one from the Mayor of London, said that design should be taken into consideration for supported and specialist accommodation, as well as co-production with residents, high-quality lasting design, focus on mental and physical wellbeing, and providing better facilities inside developments and near them
- 1 resident said that there should be more of a focus on larger families and low income residents when it comes to providing specialist and supported accommodation
- Unite said that the policy needs to conform with the London Plan Policies H11-H16
- 11 comments, from residents and LB Redbridge overall supported elements of the specialist accommodation policy, including planning for different types of specialist accommodation such as shared living and rented accommodation, accommodation for unsheltered people, accommodation for older people, accommodation for people with learning difficulties, purpose-built student accommodation, and overall improved policies for accessible and adaptable homes
- UCL said that they recognise the importance to build purpose-built student accommodation so it does not undermine conventional housing, but that there is no mention of student accommodation in the proposed policy changes

Officer Response:

We acknowledge the range of suggestions on changes to the Plan's Supported and Specialist Housing Policy. The Draft Local Plan's overarching policy on specialist housing (Policy H6) includes policy requirements for a range of types of accommodation, including emergency accommodation for unsheltered people, people with learning difficulties and people who require care. As per the proposed approach in the Issues and Options document, the Draft Local Plan has introduced additional policies on built to rent housing (Policy H6), housing for older people (Policy H7), purpose-built student accommodation (Policy H8) and houses in multiple occupation and large-scale purpose-built shared living developments (Policy H9). These policies, in tandem with the new Housing Design Quality Policy (H11) seek to build upon the requirements of the London Plan and improve the delivery and design of new specialist and supported housing, improving residents' physical and mental health and ensuring residents are able to age in their homes and have access to supporting facilities where required. Policy H11 also introduces additional design criteria for wheelchair user dwellings under part 11 of the policy. Broader concerns raised through the consultation about homes having access to sufficient amenities and facilities have been responded to at Q4.

As per the response to Q5, Policy D1.1.j requires that new housing developments use high-quality and robust detailing and materials, which will help to support the lifespan of new housing developments.

In relation to the comment on supporting larger families and lower income residents, these issues have been considered under policies relating to affordable and family housing targets, discussed in response to Q1 and Q2. Policy BFN2 sets out a requirement for new major developments to be co-designed with key stakeholders, which should include local residents and could also include people who may occupy similar forms of specialist accommodation.

Other themes:

- 2 residents said they are against the regeneration of Carpenters Estate
- 2 residents said they enjoy living in Newham overall
- 19 comments referred to meeting targets, with concerns over the clarity of the Plan's housing delivery targets, the importance of meeting London's strategic housing need, and the support for delivery of small sites and a more efficient use of the existing housing stock
 - LB Redbridge said it should be fairly achievable to meet the 10% small sites housing capacity
 - Home Builders Federation said the Council will have to identify small sites in line with the NPPF and the London Plan to support the delivery of more homes
- 5 comments from residents, developers, and LB Redbridge, mentioned queries over the evidence-base being carried out
- There were 15 general comments, from residents, developers, Climate You Change, One Newham, LBN Public Health, Home Builders Federation, and LB Redbridge, including the concern over the quality of HMOs, as well as the availability of care homes, the delivery of homes for unsheltered people, and adapted homes

Officer Response:

We acknowledge the feedback provided in relation to other themes, including the number of comments on meeting the borough's London Plan housing target. Our housing target proposed under Policy H1.1 seeks to meet our London Plan target and is based on the London Plan's 'design-led approach', which has involved

modelling the design of a range of sites to determine reasonable capacity assumptions. The target phasing is based on up-to-date engagement with landowners and consideration around whether sites are 'developable' in line with the definition in the National Planning Policy Framework. Policy H1.1.b also supports the optimisation of housing delivery on small sites, recognising the important contribution these sites make to housing delivery. Policy H2 further sets out exceptions that allow for the conversion or subdivision of family-sized homes where these would make more efficient and better quality use of housing stock, and would not undermine our ability to protect good quality family homes. This include an exception that would allow the conversion of family homes to accommodation that meets the housing needs of people placed or due to be placed in emergency temporary accommodation by Newham Council as a result of homelessness (H2.5).

In relation to comments on evidence base, the housing policies have been written using evidence from the borough's recently commissioned Strategic Housing Market Assessment, Gypsy and Traveller Accommodation Assessment and Local Plan Viability Assessment. These have informed various housing-related targets in the Plan, as well as informed policies on the delivery of different types of specialist and supported accommodation, such as care homes. In relation to comments on the quality of private rented sector accommodation and the need for adapted homes, these aspects have been addressed under the Draft Local Plan's Design Policy H11, which includes design standards for a range of housing types and includes requirements on the amount and design of wheelchair accessible and adaptable properties in new developments.

In regard to comments on the Carpenters Estate regeneration, this project is being taken forward by Newham's Regeneration team. The Local Plan contains a site allocation that includes requirements around the design, layout and mix of uses on the site. We accept there are concerns around the delivery of this site; however, given the intention to bring the site forward for redevelopment, the Draft Local Plan seeks to ensure that any future design of the site is considered comprehensively and is of a high-quality design that meets local housing needs.

Below are the responses provided in the un-facilitated and facilitated workshops.

OUR HOMES

Discussion Summary

- Overall the group was supportive of the proposals outlined but wanted to **better understand how proposals would be delivered** to meet the needs of Newham's residents.
- One of the key discussions focused on **how Newham residents can benefit from development taking place in the borough**. Concerns were raised about the suitability and cost of new-build housing, with residents priced out of renting these new properties. There was also a knock-on effect for communities, with prices going up in local shops and businesses. The group felt the **current approach was not meeting the needs of residents** and that more needed to be done locally and nationally to address affordable housing concerns.
- The group also discussed **how homes could meet the needs of families and/or individuals with additional needs**. This included supporting the families of children with special educational needs or a disability. This included the layout of the homes and the ability to adapt them (e.g. adding wet rooms, having bedrooms on the ground floor.) **Too often families could not access homes that meet their needs**. Workshop participants believe that more needed to be done to understand the housing needs of residents on an ongoing basis and link this with housing policy.
- The final part of the discussion focused on whether housing policy should focus on **how we support people to stay in their homes** (for potentially 40-50 years) or whether we should **be encouraging people to move into specialist settings**, which might better meet their needs. There was a sense that it might be a mixture of both, with **residents wanting some choice depending on their circumstances**.

Jamboard comments

We need more variation in our homes to meet needs of people with disabilities / SEND

Sustainability should be integrated into all of our work

Access to high quality open spaces and parks is really important for families

Increasing house prices also changes facilities and prices in the area

From the information you have had so far, how do you feel about the proposals?

Feeling	Percentage
More to do	25%
Good	25%
Not bad	50%

Proposals discussed

1. Maximising the delivery of genuinely affordable homes that meet the needs of Newham's residents	4. Delivering family homes
2. Seeking to deliver Newham's housing target	5. Meeting specialist housing need
3. Improving energy efficiency, reducing fuel poverty and contributing further to carbon reduction target	6. Best practice in the design of new housing, to meet the needs of Newham's diverse population

WE ARE NEWHAM.

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People at the Heart of Everything We Do

WE ARE NEWHAM.

BUILDING A
FAIRER
NEWHAM

Workshop Theme	Jamboard Summary
Housing 20 th November 2021	Housing need – HMOs, family-sized housing and single people • HMOs are putting pressing on Newham's housing market and reducing the availability of family housing stock • We want to be utilising our existing housing stock to best effect and retaining our supply of family housing • We need to protect our existing housing stock • We also want to make sure there is enough purpose-built housing available for students and single people so we're not putting pressure on conversion of family homes
	Housing affordability • It is often financially difficult for single people to access homes other than HMOs. There need to be housing options for single people as often studios and one-bedroom flats are not affordable.
	Spatial strategy • We need to balance where family homes are best located i.e. Royal Docks or new strategic sites. Town Centres may not always be appropriate for family dwellings • Converting former industrial uses and redundant car parks to housing can be beneficial for the character of areas and is viewed as a good thing. We want to avoid using virgin land or green spaces to deliver housing • Homes need access to community facilities. We do not want to create housing 'islands' with no access to services.
	Quality of accommodation • Important we have enough space for cycle parking; storage as well as access to car clubs
Housing 29 th November 2021	Housing Needs • Support delivery of more affordable and family homes – this is what makes Newham a liveable area. • We want to avoid segregating communities by characteristics such as age
	Housing Typologies • Birmingham example of multigenerational living referenced. In this instance, flexibility of layout was important to the design.
	Density • High-density housing can work well and help stimulate investment in infrastructure and parks. However, these developments can make it challenging to incorporate more open spaces. • In terms of estate renewal, it is questioned how we can deliver high density while retaining community cohesion. • We want developments to feel less suburban and more integrated with employment (for example, employment at the ground floor levels)

	Spatial strategy • Homes should be supported by a cluster of neighbouring uses • A range and mix of uses are needed to create mixed communities • We need to make sure we have sufficient centres and infrastructure to support new homes • 15 minute neighbourhood concept is supported. Homes need proximity to shops, dentists, schools etc. • Community spaces need to be multi-functional to ensure new homes are serviced by local community spaces. • It is important to balance the delivery of homes and employment • Co-location can be challenging to deliver, particularly making sure industrial uses are not compromised by new residential homes. • Question whether it is feasible for heavier industrial uses (e.g. waste transfer and printing) to be near residential properties; Access of vehicles for employment uses is often an issue • We should try to understand what brings young people to housing, for example transport links and key interchanges like Stratford. However, other areas that are not so well connected may be less attractive to young people. • There currently seems to be a juxtaposition between housing in the Olympic Village versus the wider Stratford and West Ham neighbourhoods. Quality of accommodation • New building materials and glazing can make neighbourliness easier to achieve • Challenges of viability make it difficult to deliver above and beyond current quality standards • We need to make sure people aren't excluded through consultation on things like increases to space standards (recent PD changes) • We want to make sure there is no segregation of facilities in new developments. There should be affordable access to spaces/facilities in new developments • Waste should be one of the first things thought about in designing new developments • The pandemic has emphasised the importance of different functions of housing (for example space to study and access to parks). • We also need to plan for things returning somewhat to pre-pandemic working, while retaining some of the changes that have taken place over the course of the pandemic, for example increased walking and visiting community facilities.
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Officer Response:

We welcome the range of feedback on housing policies in the workshops held. Over the course of the Draft Local Plan period Newham will see a number of high-density developments being delivered, and the Draft Local Plan will help to manage some of the challenges associated with building at higher densities. Key sites where housing delivery will take place, including estate regeneration sites, have been identified as site allocations within the Draft Local Plan. We have carefully considered what range of uses are suitable on different sites, including residential uses, industrial and employment uses and Town Centre uses. The

masterplanning of these sites will help to foster cohesive communities and ensure different land uses are compatible with one another, and will ensure residents have access to necessary community facilities, services, open space and infrastructure. Effective masterplanning will mitigate the challenges associated with co-location of different uses, such as effective servicing and reducing noise pollution. We also welcome comments around the need to balance housing and employment delivery. Comments around ensuring the appropriateness of co-location of these uses are discussed in response to Q2.

While the bulk of new housing delivery will take place on allocated sites, the Draft Local Plan encourages the delivery of homes on land not allocated for other uses or protected under Local Plan policies (for example, Greenspace). The vast majority of housing delivery will take place on brownfield land, including some former industrial sites. Site allocations delivering new housing will respond to any gaps in 15 minute neighbourhoods, and should deliver a mix of housing typologies, tenures and sizes to meet a range of housing needs. The distribution of site allocations across the borough does mean that some neighbourhoods (for example, Stratford and Maryland) will be subject to more transformative changes than areas with fewer site allocations or established residential areas.

Broader concerns raised through the consultation about homes having access to sufficient amenities and facilities have been responded to at Q4. Policy CF2 requires applicants for new community facilities to maximise opportunities for the shared use of facilities. Similar concerns about the draw of new homes that lack access to transport links are addressed more broadly through the Plan's Transport policies, including Policy T1, which sets the broad objective to protect and enhance strategic transport infrastructure.

We acknowledge the comments raised around development needing to benefit Newham residents, particularly in terms of affordability. While the Local Plan cannot control the affordability of local business prices, we can ensure that new homes being delivered provide a sufficient level of affordable housing to meet the needs of future residents. We also welcome feedback around needing to create mixed communities. The Draft Local Plan's housing policies have been drafted to respond to evidence of Newham's most pressing housing needs, including for affordable and family-sized homes, as well as different forms of supported and specialist accommodation. A mix of housing sizes and tenures will also be promoted in all locations considered suitable for housing. The mix of homes sought through the Plan, including our family-sized housing target, has been found to be viable. We welcome developers' suggestions on housing mixes, such as pepper-potting.

In relation to family housing, the discussions showed support for the protection of family housing, as well as an acknowledgement of the affordability challenges single people and students face in seeking one-bedroom homes. While the Draft Local Plan policies do allow for conversions to houses in multiple occupation (under Policy H2) and the delivery of purpose-built student accommodation (under Policy H8), these forms of accommodation need to be balanced against the need to protect family homes, which represent around 60% of the borough's housing need. More broadly, all housing floorspace will be protected from conversion to non-residential uses (Policy H2.1).

We acknowledge the points raised around needing to understand the need for specialist and supported housing. Our latest evidence of housing need has analysed the needs of people who require supported

forms of housing, including considering people's desire to remain in their homes. This information has informed the approach set out in Policy H6 Specialist and Supported Accommodation, which seeks to ensure that specialist housing meets local needs and has access to relevant supporting facilities (Policy H6.2). In addition, Policy H11 sets out design criteria for different forms of specialist accommodation and wheelchair adapted accommodation. The workshops also highlighted mixed views on the suitability of housing designed specifically for older people, with some people questioning its contribution to creating more mixed communities. Policy H7 of the Draft Local Plan provides specific requirements for housing designed for older communities (50+), responding to the London Plan policy which sets an annual benchmark for older persons' housing delivery within the borough. We also acknowledge some respondents' views on preferring houses as opposed to flats for older people.

The workshops also raised concerns around the quality of accommodation in the borough, in particular the need to respond to the challenges raised during the COVID-19 pandemic (for example, having sufficient space to work from home and access to outdoor space). Policy H11 has introduced a number of requirements responding to these points, in particular the need to ensure all new homes are flexible and adaptable to people's changing needs over time. Policy H11.6 also requires affordable housing to be of an equivalent quality to private accommodation, and provides affordable access to facilities at an equivalent cost to Council facilities. Other design-related quality standards, such as design of waste storage, cycle storage, provision of car club spaces, quality of materials, quality of open space and environmental considerations are addressed through Policies T3.1, T3.3, W3, D1.1.j and the Green and Water Spaces and Climate Emergency chapters of the Plan. While the policies cannot influence new homes delivered through relaxed Permitted Development Rights, they will be used to assess the design of any new homes that come forward over the new Plan period that require planning permission. While these requirements may have some cost implications, they will help to address the comments received throughout the consultation around ensuring the design of homes help to improve resident's physical and mental health.

Q1. Do you agree with the proposed changes?

- 28 comments from residents, developers, NHS Urban Development Unit, Natural England, LBN Public Health, Mayor of London, LB Waltham Forest, The Woodland Trust, Port of London Authority, and the Lea Valley Regional Park Authority agree with the proposed policy changes, including tackling air pollution, the development of an urban greening policy, and the approach to burial spaces, and trees
- 3 residents disagree with the proposed proposals
- 1 resident agrees with the proposals but thinks Newham City Farm needs to be included in the policy, similarly to the NHS Urban Development Unit, who agrees with the proposals but thinks waterways should be mentioned further
- The Mayor of London, Lea Valley Regional Park Authority, and CPRE specifically mentioned their support for the open spaces policy approach, including their measurement of quality and functionality, the support for a minimum space per population standard, and the support for physical activity and play spaces
- LBN Public Health, Lea Valley Regional Park Authority, and LB Waltham Forest highlighted the benefits of green and water spaces, in that they improve mental health and wellbeing and are valuable for the community
- The Lea Valley Regional Park Authority, Natural England, and Mayor of London showed support for the 10% Biodiversity Net Gain
- The Lea Valley Regional Park Authority and Port of London Authority agree that access to the Thames Path should be improved and that there should be a balance of different uses in water spaces
- CPRE, The Woodland Trust, LB Redbridge, Friends of West Ham Park, Environment Agency, residents, and NHS Urban Development Unit, and the Mayor of London mentioned support for a local metric to measure Urban Greening Factor and working jointly, yet developers said any increase needs to be evidence-based
- Both developers and Action for Swifts said the policy approach is not prescriptive enough in terms of urban wildlife

Officer Response:

We recognise and are encouraged by the positive feedback and the broad support for the changes proposed on Green and Water Spaces. Our emerging evidence is providing the Council with an up-to-date understanding of our open and water space provision. The study demonstrates we have a low rate of provision for open space, with 2.54 hectares per 1,000 residents and a publicly accessible open space rate of just 0.69 hectares per 1,000 residents. The borough currently experiences shortfalls in publicly accessible open space, areas for growing food and play space.

The Council is committed to protecting green and water spaces for the benefit of people and the environment. The emerging Local Plan seeks to improve existing green and water spaces and to deliver new ones to meet the differing needs of our residents. These aspirations are reflected through:

- The protection of existing open space and maximisation of opportunities for improving their functionality, quality, and accessibility.
- The requirement for all developments to maximise urban greening and to seek opportunities to improve Newham's network of green links (see Policy GWS1.1).
- The demonstration of how the scheme improves local air quality through species selection and the layout of landscape features, when providing publicly accessible open space (Policy GS1.4).

- Contributing to nature recovery by maximising 'living building' elements such as green and brown roofs, green walls and integrated features to help wildlife to thrive, for example bird nest bricks and roost bricks for bats (Policy GW3.1).
- A specific policy on trees and hedgerows introduced. It seeks to protect and deliver a network of improved tree stock, with the ultimate ambition of increasing Newham's canopy cover (Policy GWS4).

Respondents highlighted the multiple benefits our green and water spaces provide. The Council agrees that Newham's natural resources are incredibly valuable. We will publish an Interim Green and Water Spaces Strategy (2022) to support the Local Plan Regulation 18 Consultation. This evidence will be completed as we continue to draft the Local Plan. It will form a full Green and Water Spaces Infrastructure Strategy and will also include a borough-wide natural capital account.

Of the 144 respondents to this theme, three residents disagreed with the changes being proposed. When answering this question no further information or detail was provided. It is therefore not possible to address the concerns they had. Consultation on the Draft Local Plan will provide more policy detail and will allow these respondents another opportunity to explain any concerns they may have in respect to this chapter.

In September 2021, Cabinet made a decision to close Newham City Farm (meeting held on 7 September 2022). One resident agreed with the proposals in this chapter overall but was concerned by the closure of this facility. The Council is currently working with residents and community stakeholders to create a future vision for the Beckton Parks Masterplan area, of which the farm is a key area. The community is an integral part of co-designing the future of this area. The landscape offers enormous potential to create new and improved sports, leisure, wildlife and community-led opportunities through improving existing spaces and facilities and re-purposing areas to better meet local needs. More information can be found here:

<https://newhamco-create.co.uk/en/projects/becktonparksmasterplan>.

The NHS Urban Development Unit agreed with the proposed changes but wished to see more on the topic of waterways. The Local Plan includes a dedicated policy on Newham's water spaces. This is a change to the existing Local Plan (2018) which combined issues facing both green and water spaces.

The support for seeking to maintain a minimum amount of open space per resident is welcomed. Over the Plan period – and as Newham's population grows – Policy GSW1 will seek to maintain 0.69 hectares per 1,000 residents of publicly accessible open space and 0.047 hectares of allotment and community garden space. The Local Plan will achieve this by protecting existing open space and encouraging new publicly accessible open space in schemes which are preferable to the Mayor of London, or where a specific green or water space has been identified by the Council.

There was support for greater policy direction on play space and informal recreation facilities. The Local Plan now includes a policy dedicated to Play and Informal Recreation for All Ages (GWS5). It seeks to protect existing facilities and encourages new play and informal recreation on new development sites. Despite our youthful population, Newham currently has a low level of play and informal recreation space. The Fields in Trust recommends a standard of 0.25 hectares per 1,000 residents for playgrounds. Newham

currently falls short of this, with just 0.025 hectares per 1,000 resident. This represents a shortfall of 80 hectares. It is therefore vital we take a strong policy approach to maximise any opportunity to provide new publicly accessible play space. These spaces must not only be exclusively for those living in new developments but must provide much needed play space to our existing neighbourhoods.

Support for Biodiversity Net Gain is welcomed. Policy GWS3 requires development to deliver 10% Biodiversity Net Gain, with a clear priority for on-site and in-borough measures. The Interim Green and Water Spaces Strategy has explored the potential of introducing a higher Biodiversity Net Gain percentage. London Wildlife Trust is working with Jon Sheaff Associates on our emerging Green and Water Infrastructure Strategy. As part of this, London Wildlife Trust considered the merits of introducing a higher Biodiversity Net Gain percentage requirement. Biodiversity in Newham, in common with elsewhere in London, is generally in decline. An increase above the mandatory 10% Biodiversity Net Gain would seem to be a guaranteed way of increasing biodiversity in Newham. However, Biodiversity Net Gain is a measure of the relative change in biodiversity above the baseline. Where the baseline is low, the relative change is also low and an uplift of 15% or 20% would only deliver a marginal increase in actual biodiversity above that delivered by a 10% gain. Most development sites in Newham will have a low or very low biodiversity baseline; therefore, a 15% or 20% Biodiversity Net Gain requirement is likely to deliver a relatively small increase in biodiversity. Where a development site has a medium or higher-level biodiversity baseline (development on a SINC, for example) an uplift to 15% or 20% would result in the need to provide a significant level of actual biodiversity gain. However, the developer is not obliged to deliver the Biodiversity Net Gain on-site and a higher requirement might encourage the developer to seek an offsite solution. Should that be the case, although the offset is likely to result in the creation of a substantial area of compensatory habitat, it is unlikely to be delivered close to where the loss occurred and might not be within the borough. This is because there are likely to be limited offsetting opportunities within the borough due to the lack of existing areas of underutilised open space with low existing biodiversity value. Consequently, although the outcome for the natural environment in these circumstances is a net gain the outcome for the borough could be a net loss.

An additional consideration is the relationship between the London Plan Urban Greening Factor and Biodiversity Net Gain. The Urban Greening Factor was developed for London, in part, due to the likelihood that on many development sites the Biodiversity Net Gain requirement may deliver relatively little due to the low biodiversity baseline. The Urban Greening Factor is not a measure of relative change from a baseline; therefore, all developments have to implement a significant amount of urban greening to achieve the recommended target score. By so doing, in most cases, a Biodiversity Net Gain of 10% or more is achieved as a beneficial secondary outcome. Raising the Biodiversity Net Gain requirement to 15% or 20% is likely to have limited benefits in the vast majority of development scenarios in Newham. Even for those developments which would be required to provide a significant package of Biodiversity Net Gain there is a risk that this would not accrue to the borough.

We welcome the support for improvements to our water spaces, including providing better access for people for enjoyment and recreation, but balancing this with ecological needs and the function of water as infrastructure. The Local Plan, as stated above, now has a dedicated policy to address Newham's water

spaces (GWS2). The contributions and suggestions given to this area of planning have been welcomed and have helped inform the proposed policy.

We are continuing to explore a Newham-specific Urban Greening Factor. We acknowledge that if we introduce a variation to the London Plan's Urban Greening Factor, it must be based in sound evidence. This will form part of our emerging Green and Water Space Infrastructure Strategy, and will follow the process set out in the [London Plan's Urban Greening Factor Guidance](#) (2021). The outcome and future policy direction on this point will form part of the future Regulation 19 Local Plan consultation.

Policy GWS3 Biodiversity, Urban Greening, and Access to Nature sets out the need for development to maximise 'living building'. This requirement is supported in the implementation text, which provides guidance to Applicants on what is meant by 'living building' features. Examples of living building elements include green and brown roofs, green walls, bird nest bricks and artificial nest sites, roost bricks for bats and designing lighting in a bat friendly way, ensuring boundaries allow hedgehogs to move freely and using Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscaping and vegetation.

We will not be introducing a standalone policy for burial spaces and will rely on the London Plan's Policy S7.

Q2. Are there other changes we should consider?

- 5 residents said nothing else needs to be considered
- Action for Swifts and 28 residents said there needs to be more consideration toward trees, including:
 - Planting more trees to improve residents' mental health and make areas look more appealing
 - Trees on streets needing better maintenance and protection
 - The Woodland Trust emphasises that planting more trees helps mitigate air pollution
- 26 comments from residents and Climate You Change considered elements that need to be further taken into account, such as:
 - needing more greenspace and re-purposing greenspaces such as Will Thorne Pavilion, especially around schools
 - needing more play space
 - better safety in greenspaces such as the Greenway
 - protection of greenspaces from housing developments, such as Newham City Farm and the Green Belt
 - implementing rain gardens, bird nesting, rain gardens, LTNs, trees, meadow land, wildlife gardens, and general urban greening
 - promoting active travel and creating well-connected walking paths
 - re-wilding
 - applying the NPPF and London Plan
 - working with the community
- Developers said the proposals for minimum space standards should be removed, and that any increase needs should be evidence-based, flexible, and deliverable
- 3 residents encourage the designation of a new River Roding Park at 'Edgelands', achievable via joint working with the River Roding Trust, and connecting it to Leigh Road Sports Ground and Barrington Playing Fields
- Developers oppose the inclusion of the Urban Greening Factor as it is already covered by the London Plan and the UGF London Plan, claiming industrial uses need to remain flexible and that 'functionality' as a metric of space should be supported

Officer Response:

We acknowledge the suggested changes around the need to plant more trees and welcome the support for there being a greater focus in the Local Plan on trees and their importance. The Local Plan includes Policy GWS4 Trees and Hedgerows, a newly introduced policy. The policy gives a clear focus on the need to protect and provide a network of improved tree stock and canopy cover. The policy includes a requirement to maintain any trees/hedgerows which are planted as part of a scheme and for development not to harm, during any demolition taking part and the construction phase, the existing on-site trees, hedgerows and vegetation which is to be retained as part of a scheme or those in proximity to the site.

Comments regarding the need for more greenspace and for making best use of existing greenspace (especially around schools) and protecting such spaces from development are welcomed. As stated above, the Interim Green and Water Spaces Strategy has undertaken an audit of Newham's existing open space provision. This has highlighted just how scarce a resource green open space is in the borough. This emerging evidence supports the approach being taken in Policy GWS1 to: protect open space (to ensure there is no net loss), maximise opportunities for improving the functionality, connectivity, quality, and

accessibility of existing open spaces and maximise opportunities to deliver new and improved open space (including playing pitches and ancillary sporting facilities).

We recognise and hear clearly from respondents the desire for more play space. This is a need which has been verified by the Interim Green and Water Space Strategy. Newham currently has a low level of play and informal recreation space. The Fields in Trust recommends a standard of 0.25 hectares per 1,000 residents for playgrounds. Newham currently falls short of this, with just 0.025 hectares per 1,000 resident, which represents a shortfall of 80 hectares. The Local Plan now includes a policy specifically on the provision of play and informal recreation space. It is clearly vital for us to maximise any opportunity to provide new publicly accessible play space. These spaces must not only be exclusively for those living in new developments but must provide much needed play space to our existing neighbourhoods.

Safety in open spaces is an important issue raised by respondents. The implementation text to support Policy GSW1 requires open space to be designed to a high-quality and to be welcoming. Key elements set out below can help open space be better used and safer:

- Be distinctive and welcoming – encouraging people to stay.
- Be designed and managed to meet the diverse and changing needs of Newham's population.
- Be designed for effective management and maintenance.
- Have clear entry points with signage, which are attractive and well-located.
- Be overlooked.
- Avoid rigid boundaries where it is safe to do so by greening the public realm surrounding parks and creating more seamless transitions between park and street.
- Provide generous seating and social space for children, young people, and adults.
- Provide shade, shelter, and lighting suitable to the local environment.
- Be capable of changing and evolving over time.

Feedback from the consultation asked the Council to address various aspirations which are linked to green and water spaces. These points have been incorporated into the proposed policies in this chapter. Policies have been drafted to be in conformity with the National Planning Policy Framework and the London Plan (2021). The list below provides directions to the policy where a particular issue is addressed:

- Policy CF1:
 - Protection of greenspace.
 - Protection and provision of playing pitches.
 - Requirement to work with the community and co-design new publicly accessible open space.
- Policy CF3:
 - Measures to deliver biodiversity improvements.
- Policy CF4:
 - Improvements to water space connectivity.

We note the desire to deliver a River Roding Park and to better connect the River Roding Park with Leigh Road Sportsground and Barrington Playing Fields. As part of the evidence base to support the emerging Local Plan, we are developing a Green and Water Spaces Strategy. This is undertaking an audit of the spaces

we have and the opportunities to improve existing space and create better links and connections. This feedback has helped inform this emerging Strategy.

Developers opposed the inclusion of a Newham-specific Urban Greening Factor, insisting that it is adequately covered by the London Plan (2021). The need for industrial uses to remain flexible was also stressed. As stated above, we are continuing to explore a Newham-specific Urban Greening Factor, as Policy G5 of the London Plan encourages boroughs to do. We want to ensure that the appropriate amount of urban greening is delivered in new developments, tailored to local circumstances. The outcome and future policy direction on this point will form part of the future Regulation 19 Local Plan consultation.

'Functionality' as a metric of space was supported. This is an element we are continuing to work on as part of the emerging Green and Water Spaces Strategy.

A number of developers opposed the inclusion of a Newham-specific Urban Greening Factor.

Q3. Is there anything missing?

- 3 residents said nothing is missing
- 69 comments from residents, Swifts Planning, CPRE, Woodland Trust, LB Redbridge, and Monega Association mentioned missing elements, including:
 - better maintenance and management of greenspaces, following the example of West Ham Park
 - Residents mentioned parks are wonderful assets to the community, but that they need improvements, such as cafés, play spaces, public toilets, public gyms, better accessibility, and improved lighting
 - regenerating derelict open spaces and grey spaces to create new parks
 - urban greening such as street trees and flower beds
 - floating habitats
 - need to protect trees through Tree Preservation Orders
 - food sources for animals
 - community gardens need to be considered and protected
 - permeable front gardens
 - the benefits of Newham City Farm for the environment and for community vitality
 - jointly working with surrounding authorities
 - natural flood defences
 - geodiversity as per the London Plan G9
 - swift bricks
 - tackling climate emergency
 - cycle infrastructure and improving access to it, such as with better lighting
 - consideration of all species in biodiversity assessments
 - striking a balance with burial spaces
- Natural England encourages LBN to apply the Accessible Natural Green Space Standard across the borough so everyone have access to natural greenspace, and The Woodland Trust supports the approach for a minimum open space standard
- LB Redbridge said the Epping Forest SAC needs to be revised to increase the mitigation of recreation and further reduce Nox emissions
- 1 resident said that the Council needs to work with the River Roding Trust to prioritise the designation of the new River Roding Park, and the Lea Valley Regional Park Authority encourages the allocation of additional open space as well as joint working between authorities along the Lea/Bow Creek to work toward linking it with India Dock Basin
- 1 resident said the Council is missing an internal ecologist member of staff
- The Mayor of London said specific guidance on aviation is needed to address the impacts of the airport on biodiversity

Officer Response:

Feedback from the consultation asked to include elements considered missing in the Issues and Options chapter on Green and Water Spaces.

Natural England encourages the Council to apply the Accessible Natural Green Space Standard across the borough so everyone has access to natural greenspace. The Woodland Trust supports the approach for a

minimum open space standard. This is work the Council has undertaken and can be found in the Interim Green and Water Spaces Infrastructure Strategy (2022).

We welcome the Lea Valley Regional Park Authority assertion to allocate additional open space as well as support joint-working between authorities along the Lea/Bow Creek to work toward linking it with India Dock Basin. As stated previously, the emerging Green and Water Spaces Strategy will identify the projects and opportunities to deliver improvements to the natural environment. This will provide better links for people and improved connections for wildlife.

We acknowledge that the Council is missing an internal ecologist. This is something we are keenly aware of.

The Mayor of London supports the intention we set out in the Issues and Options consultation to include specific guidance on aviation in the Local Plan and to address the impact of the airport on biodiversity. Policy GWS3 requires applications to maximise biodiversity measures within the London City Airport safeguarding zone. The emerging Green and Water Spaces Strategy will further inform this aspect of the Plan and will be reflected at Regulation 19.

The closure of Newham City Farm is addressed in response to Q1.

The list below provides direction to the policy/policies where a particular issue raised is addressed:

- Policy GWS1:
 - Regenerating derelict open spaces and grey spaces to create new parks.
 - Community gardens to be considered and protected.
 - Permeable front gardens.
 - Tackling the climate emergency.
 - Cycle infrastructure and improving access to it, such as with better lighting (see also Policies T3 and D2).
- Policy GWS1.5:
 - Better maintenance and management of greenspaces, following the example of West Ham Park.
- Policy GWS1 and Policy GWS5:
 - Parks need improvements such as cafés, play spaces, public toilets, public gyms, better accessibility, and improved lighting.
- Policy GWS2:
 - Floating habitats.
 - Natural flood defences.
 - Tackling the climate emergency.
 - The Council needs to work with the River Roding Trust to prioritise the designation of the new River Roding Park.
- Policy GWS3 and GWS4:
 - Urban greening such as street trees and flowerbeds.
 - Swift bricks.
 - Consideration of all species in biodiversity assessments.

- Policy GWS3:
 - LB Redbridge said the Epping Forest SAC needs to be revised to increase the mitigation of recreation and further reduce Nitrogen Oxide emissions.
- Policy GWS1 and GWS3:
 - Importance of greenspace as food sources for animals.
- Policy GWS4:
 - Need to protect trees through Tree Preservation Orders.
 - Tackling the climate emergency.

We acknowledge that we do not currently have an in-house ecologist, however we are undertaking work with Jon Sheaff & Associates and working with London Wildlife Trust to better understand the quantity and quality of our natural spaces (both green and water), as well as Sites of Importance for Nature Conservation. This work will culminate in a Green and Water Spaces Infrastructure Strategy, which will both inform the Local Plan and guide the work which the Council's Parks team undertakes to improve our natural assets.

We will meet the requirements of Duty to Cooperate and will work with neighbouring boroughs and planning authorities over the development of the Plan on key joint projects.

We are not introducing a separate policy on geodiversity, we will make decisions in accordance with Policy G9 of the London Plan.

Please see the above for our response to the approach we are taking on burial spaces.

Q4. What do you think the priorities for our greenspaces should be?

- 39 residents said the priority should be to increase biodiversity and access to wildlife in ways such as creating more pocket parks and linear routes connecting greenspaces through active travel
- London City Airport would like to work jointly with the Council to enhance ecology around the Airport
- Friends of West Ham Park support the NPPF's guidance of biodiversity
- The Environment Agency, the Marine Management Organisation, the River Roding Trust, and residents said that the protection of habitats and species should be enhanced and the adverse impacts should be avoided by means such as maintaining and re-naturalising wild areas, including wildflower meadows and brownfield sites
- LB Waltham Forest wants to work jointly on SANGS strategy for Epping Forest and the Lee Valley Regional Park
- Policy suggestions on biodiversity:
 - Updated evidence base and action plans to avoid further loss of biodiversity
 - Balance re-wilding with invasive species control
 - New developments to not affect wildlife
 - Integrate swift bricks, bat boxes and routes of hedgehogs for new developments
 - Park designations should change to better protect greenspaces, such as West Ham Park and Beckton Alp
 - Changes to greenspaces should demonstrate a net benefit overall
- 11 respondents support a higher Biodiversity Net Gain, however, developers claim it would make schemes unviable
- 6 residents and Highways England said better accessibility to greenspaces, such as Little Ilford Park
- 10 residents said better maintenance, cleanliness, and protection of existing greenspaces
- 9 residents said safety
- 2 residents said plays spaces
- 6 residents said sustainability and climate resilience
- 4 residents said more trees
- 21 residents said more provision of greenspace
- 5 residents and Fit for Walking said improving active use and existing facilities in greenspaces
- 1 resident said the creation of the River Roding Edgelands Park
- LBN Public Health, Friends of West Ham Park, Canal & River Trust, the Silvertown Partnership, and residents promote co-designing greenspaces and 1 resident said activities for residents to engage in greenspaces
- 3 residents said air pollution
- 2 residents said urban greening
- 2 residents said the even spread of greenspaces across the borough and them being close to homes
- 14 residents brought up the importance of community gardens for communities and the need for support from the Council to manage and deliver more of them
- Other priorities mentioned were facilities for older people, flood defences, Newham City Farm, re-wilding, use of brownfield sites, and more funding

Officer Response:

We welcome the feedback received on the topic of Newham's greenspaces. The Local Plan now includes a specific policy on our water spaces (Policy GWS1). In response to the specific points summarised above,

there is strong support for increasing biodiversity and access to wildlife. Officers agree that it is important that everyone living in Newham has the opportunity to access open space within walking distance from their home. This is a key part of delivering successful 15 minute neighbourhoods.

Public open space is defined as per the categories in Table 8.1 of the London Plan (2021) and includes:

- Regional Park (400 hectares)
- Metropolitan Park (60 hectares)
- District Park (20 hectares)
- Local Park and Open Spaces (2 hectares)
- Small Open Spaces (under 2 hectares)
- Pocket Parks (under 0.4 hectares)
- Linear Open Spaces

An application which increases the severity (less space per 1,000 resident) or extends an area of deficiency, at any of the above scales, will not be permitted.

Officers welcome London City Airport wishing to work with the Council to enhance ecology around London City Airport. We will ensure the Airport is consulted as part of developing Newham's emerging Green and Water Spaces Strategy.

We support the Environment Agency, the Marine Management Organisation, the River Roding Trust, and residents' desire to protect habitats and species. This is reflected in the approach taken in the policies which form this chapter.

We welcome and acknowledge LB Waltham Forest wishing to work jointly on the SANGs Strategy for Epping Forest and the Lee Valley Regional Park.

The policy suggestion on biodiversity has been included in Policy GWS3.

We note the support for increasing Biodiversity Net Gain and note developers' concerns over viability. We have responded to the policy approach to Biodiversity Net Gain above in response to Q1.

Officers acknowledge the support for improvements to greenspace accessibility. Policy GWS1 addresses this point by seeking to maximise opportunities to improve the connectivity and accessibility of existing open space. It also seeks to deliver new links. Policy GWS3 also sets out a need to improve accessibility from the perspective of nature connectivity.

The list below provides direction to the policy/policies where a particular issue raised is addressed:

- Safety is addressed in Policies GWS1, GWS2 and GWS5.
- Play space is addressed in Policy GWS5.
- Sustainability and climate change is addressed in Policies GWS1, GWS2, GWS3 and GWS4.
- The need for more trees is addressed in Policy GWS4.

- Provision of more green spaces is addressed in Policy GWS1.
- The need for improved facilities in parks to promote active lifestyles is addressed in Policy GWS1.
- The aspiration for a River Roding Edgeland Park will be addressed in the emerging Green and Water Space Infrastructure Strategy and is supported by Policy GWS2.
- We welcome and support the need for new greenspaces being co-designed, which is reflected in Policy GWS1.
- Air pollution is addressed throughout each of the policies in this chapter.
- Urban greening is supported in Policy GWS3.
- The emerging Green and Water Spaces Infrastructure Strategy and Interim report is helping us to better understand our open space provision and the interventions needed to ensure people have good access to open and nature spaces, which is supported by Policy GWS2.
- Community gardens and allotments have been mapped as part of the Interim Green and Water Space Infrastructure Strategy. We support the delivery of such spaces and acknowledge the current low provision across the borough. Policy GWS1 seeks to address this by supporting the delivery of such spaces.
- We acknowledge the other priorities highlighted as being important. These have been considered and reflected in the policies contained in this chapter.
- Please see response to Q1 in respect to the decision to close Newham City Farm.

Q5. What do you think the priorities for our water spaces should be?

- 38 respondents mentioned water space priorities:
 - The River Roding Trust said flood risk needs to be addressed through natural barriers methods and the Environment Agency advocates river buffer zones, river re-naturalisation, and Sustainable Urban Drainage Systems
 - The Port of London Authority said there is need for more lifesaving infrastructure along the riverside
 - Waterways have an important historic and current role in Newham
 - Residents want less water pollution and more biodiversity near waterfront
 - Residents and the Royal Docks team support using water spaces for community events
 - Policy suggestions on water spaces:
 - The Mayor of London and the Environment Agency recommend considering the Integrated Water Management Strategy (IWMS), the Riverside Strategy, and the Water Framework Directive (WFD)
 - The Marine Management Organisation (MMO) recommends considering the South East Marine Plan
 - The Port of London Authority recommends considering the Estuary Edges guidance
 - Enable water activities
 - Re-assess SINC designation
 - The Mayor of London recommends producing a strategy to manage water in the Royal Docks & Beckton OA
 - The Surge Cooperative recommends considering their report on Bow Creek
 - Sport England recommends considering the Playing Pitch Strategy
- 8 residents said accessibility and safety of water spaces need to be improved
- 2 residents said the priority should be to improve active travel: paths along canals and water bodies
- LBN Public Health and the Port of London Authority highlighted the importance of making a balanced use of Newham's water spaces, including leisure, sport, tourism, and transport, and consider the range of water spaces (docks, tidal Thames, rivers)
- 13 respondents prioritise improving the biodiversity, sustainability, and maintenance of water spaces
 - Re-wilding and re-introduction of species
 - Cleaner water by avoiding sewage effluents and rubbish
 - Mitigation of flood risk
 - LB Redbridge recommends working jointly to improve water quality

Officer Response:

We welcome the feedback received on the topic of Newham's waterways. The Local Plan now includes a specific policy on our water spaces (Policy GWS2). In response to the specific points summarised above:

- The policy includes the requirement for development in, adjacent to, or affecting water space to provide suitable setbacks from water space edges to mitigate flood risk and to contribute to the improvement of flood defences and river walls where necessary, preferably through a softer approach to flood management. Policy CE7 Managing Flood Risk and Policy CE8 Sustainable Drainage address the issue of flooding and sustainable urban drainage in more detail (see Climate Emergency chapter).
- Policy GWS2 seeks to improve the safety and public use of the borough's water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate. The

justification text to the policy recognises the historic importance of waterways in Newham. Indeed, having a focused policy on waterways helps to draw attention to this important element of the borough.

- We support and recognise the desire to see less water pollution and improvements to biodiversity. The emerging Green and Water Spaces Strategy will draw together our evidence on this topic and produce a strategy focused on opportunities, costed projects and delivery mechanisms to realise improvements to our water spaces.
- The desire for using water spaces for community events is reflected in Policy GWS2. It supports water-related or water-dependent facilities where it can be demonstrated there is a deficit in provision for such water-dependent uses locally and it can be demonstrated that the activation of the water space is appropriately located and does not negatively impact on navigation, ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents. The Interim Built Facilities Needs Assessment has identified the provision of facilities to support water sports and the demand for such uses over the Local Plan period.
- The policy/implementation text makes reference to the Integrated Water Management Strategy (IWMS), the Riverside Strategy, the Water Framework Directive (WFD), the Marine Plan and the Estuary Edges Guidance.
- We have initiated a Playing Pitch Strategy for Newham and are in conversation with Sport England on this piece of evidence. The findings from this study will be available ahead of the Regulation 19 consultation.
- Policy GWS2 seeks to improve connectivity.
- Officers agree with respondents who wish to see improvements to the biodiversity, sustainability and maintenance of our waterways. These ambitions chime with the requirements set out in Policy GWS2.
- We welcome LB Redbridge's offer to work jointly to improve water quality. The issue of water quality is addressed in more detail in Policy W4.

We undertook a review of the Sites of Importance for Nature Conservation as part of the emerging Green and Water Spaces Strategy. The interim report presents our early findings and will be available to view and comment on during the Regulation 18 consultation.

Officers support a strategic approach to the management of the borough's water spaces. The emerging Green and Water Spaces Strategy and Built Leisure Needs Assessment will consider the need and opportunities for Newham's water spaces. Officers are also working with the Royal Docks team, GLA and Environment Agency on a Riverside Strategy and a Local and Strategic Integrated Water Management Strategies.

Officers note the report on Bow Creek, and welcome the Surge Cooperative bringing it to our attention. This chapter now includes a standalone Water Spaces Policy (GWS2), which includes support for residential and visitor moorings outside of SIL and LIL areas where certain criteria are in place. Please also see the

Transport and Economy policies, which support the movement of freight by water. Policy GWS2 also addresses improvements to the water environment and access to it.

General comments:

- 13 respondents mentioned the benefits of green and water spaces
- Residents say it helps them improve their mental health and wellbeing
 - These spaces have really helped throughout the pandemic
 - The Canal & River Trust and LBN Public Health said they improve wellbeing because they are a resource for leisure, exercise, and social connection, but they consider that green and blues spaces should be conjoined
- They can improve active travel routes, such as the proposed River Roding corridor
- Water spaces can heat and cool buildings
- The Mayor of London proposed using Section L (cemetery developments) of the Environment Agency's Approach to Groundwater Protection as guidance to manage burial spaces
- Over 3 residents have voiced concerns over the closure of Newham City Farm, as it is a vital community asset
- Residents said the Council needs to do more to green the borough and needs to explain the approach to building more housing whilst protecting open space
- 10 respondents mentioned food growth in their comments
 - Support for more allotments, raised beds, vertical planting, plant nurseries, and community gardens
 - Public Health raised the positive benefits of spaces for food growing
 - Desire for incorporating food growing spaces into the 15 minute neighbourhood
- There were 41 comments regarding the topic of open space
 - Residents have said that open space is necessary to unite the community, to provide space for exercise, play, skate, and for young people to learn about the environment
 - Lee Valley Regional Park Authority said planning obligations should fund more investment in open spaces and residents voiced that parks are ran down and need more investment overall, such as providing water fountains
 - Natural England said there needs to be more consideration toward geodiversity conservation
 - The Environment Agency said that the policy needs to protect Local Wildlife Sites (LWS) and the Lee Valley Special Protection Area (SPA) and a target for wild cover should be set
 - Developers do not consider that the Council should protect all open space from development
 - Residents support measuring open space per capital as a metric to monitor

Officer Response:

We welcome the general comments received on this topic. The issues detailed below are those which have not been addressed in the responses to the questions listed above.

Officers agree with the respondents who emphasised the mental health benefits of green and water spaces and the vital importance they played during the COVID-19 pandemic. These benefits are mentioned in the Green and Water Spaces chapter and highlight why it is important we seek to protect existing spaces and deliver new publicly accessible open and water spaces.

We also recognise the potential our waterways offer to improved connectivity as well as access to nature. This is something we are exploring in the emerging Green and Water Spaces Strategy. The benefits of water spaces to help mitigate the impacts of climate change are highlighted in Policy GWS2.

The Mayor of London proposed using Section L (cemetery developments) of the Environment Agency's Approach to Groundwater Protection as guidance to manage burial spaces.

Concerns regarding the closure of Newham City Farm are addressed in the response to comments made in Q1.

The low rate of open space provision in Newham and with future projected population growth means we have ensured that strategic Site Allocations, where appropriate deliver the required amount of publicly accessible open space.

The need for food growing opportunities was a frequent general comment made. Policy GWS1 supports the provision of food growing spaces. Please see the response to Q1 for more detail on the assessment of open spaces we are undertaking to better understand our allotment and growing space needs.

Some developers expressed a view that Newham should not seek to protect all open space, citing the importance of meeting housing need. The Local Plan take a strong protectionist approach to our open space. This is because our existing levels of provision, across all scales are so low. That said, Policy GWS1 does offer some flexibility where loss may be acceptable on a development site. Importantly, any loss will need to be mitigated by re-provision in Newham and must not increase any level of open space deprivation. An application which increases the severity (less space per 1,000 residents) or extends an area of deficiency, at any of the above scales, will not be permitted.

We will access and manage burial spaces in accordance with Section L of the Environment Agency's Approach to Groundwater protection. We do not intend to introduce a standalone burial policy and will be accessing applications in accordance with Policy S7 in the London Plan (2021).

We are not introducing a separate policy on geodiversity, we will make decisions in accordance with Policy G9 of the London Plan.

Below are the responses provided in the un-facilitated and facilitated workshops.

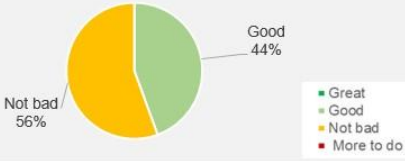
OUR CLIMATE AND OUR GREEN SPACES



Discussion Summary

- The group was highly engaged in the topic of Our Climate and Our Green Spaces. Participants had a shared sense of urgency and passion, and **many people were already taking action in their communities** to support biodiversity and reduce carbon emissions.
- There was broad support for the proposals outlined by Newham's planning policy team, with the discussion focusing more on how we might make these a reality. There was a **lot of discussion on how residents could work with and influence planning policy**, especially supporting the co-design of green spaces and how we can encourage more rewilding across Newham.
- There were a number of ideas shared for how we **ensure our existing housing stock can be improved**. This became a key point of discussion, with the group recognising that new developments would be a small percentage of the buildings in an already highly urbanised environment. The detailed ideas shared will be explored in more detail by the planning policy team.
- How the **Council can act at a systemic level and as convener of communities was a key theme of the discussion**. A number of small organisations had not met (e.g. friends of groups) and there was agreement that groups working with and learning from each other would help support us to work in a more systemic way, e.g. building green corridors for wildlife across Newham.

From the information you have had so far, how do you feel about the proposals?



Proposals discussed

Our Climate		Our Green Spaces	
1. Zero carbon future – greater energy efficiency of buildings / net zero on site	4. Mitigating overheating	1. Improving access to and quality of open space – a minimum standard for Newham residents	4. Priorities for our water spaces
2. Encouraging retrofit	5. Reduce impact of poor air quality, noise and light pollution	2. Newham specific Urban Greening Factor and Biodiversity Net Gain	5. Co-design of green and blue spaces
3. Energy efficiency targets – reward/penalise developers	6. Flood risk reduction guidance	3. How our open spaces are managed – are they welcoming and accessible?	6. Guidance on the airport and biodiversity

WE ARE NEWHAM.

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People at the Heart of Everything We Do

Workshop Theme	Jamboard Summary
Green Spaces & Climate Emergency 20/11/21	Retrofitting – cool to see where it takes Newham Air quality - Airport will continue to impact the air quality of the borough Poor air quality impacted by airport Quality of green spaces - Green spaces need more TLC – Beckton Park feels closed off and under maintained. Green spaces - nice to have more green spaces. Provide additional smaller green space – opening up parks to more people. How do you improve access to parks and make them nicer to use? Increase people's knowledge of their parks (and where they are!) Green infrastructure - Small green infrastructure – parklets, allotments, community gardens - places for people to rest, play – co-design and getting people involved. Create a smaller networks of green infrastructure – mesh – using underused parking spots – parklets Biodiversity - Island habitats in the Channelsea river – use of waterways for wildlife and biodiversity. Planting along the greenway – opportunity Beckton Park – wild, which is nice. Safety – often only person in Beckton Park Ambitious targets – IF the Council is committed! Water spaces – Royal Docks – use the vast water space much more
Green Spaces & Climate Emergency 29/11/21	Green spaces - fantastic green spaces across borough Future green spaces - Gaslight and coke company sports field, lady trower trust land – community facility – potential for new green spaces. River Roding Edgelands greenspace River Roding – southern bit of Roding – only just discovered nature reserve – who knew – making it more accessible and nicer. Wildlife and nature End of the Roding – walk along the Thames – connecting all these local places up. Back of beyond! Dead end! Water spaces - No policy for water use. Encourage rowing, open air swimming Water facilities – lucky to have them – right investment can cause massive improvements Royal Docks – canoeing, sports. Good to see, supportive. People can train, future Olympians.

	Safety - Not seen patrolling community support officers – frequent green space – feel more safe! Greenway – incidents of people being attacked for their bikes - safety – would not cycle along at night and not alone General - Wonderful points – is it all just rhetoric – e.g. you want to close Newham City Farm Great assets – we can regenerate Newham Historic – preserve history we have – buildings in Newham. WW2 destroyed lots. Treasure the things that we have. Never has been a priority.
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Officer Response:

We welcome the range of feedback and discussion held on the green and water space policies in the workshop held. The issues raised echoed those gained in the wider public consultation. It highlighted the importance people place on our existing natural resources and the potential to do so much more to increase access to open spaces. We support the ambitions and issues raised – these have been incorporated into this chapter and will be reflected in the emerging Green and Water Spaces Infrastructure Strategy.

Q1. Do you agree with the proposed changes?

- 36 comments, including those from LBN Public Health, Natural England, Lea Valley Regional Park Authority, LB Redbridge, and LB Waltham Forest agree with the proposed policy changes, specifically the inclusion of the climate emergency, the proposed sustainable development requirements to tackle it, and the increased guidance on flood risk reduction.
- 6 comments, both from residents and developers, partly agree with proposals but believe they should be balanced against other policy requirements, and consider that there should be more of an emphasis on flood risk, air quality, trees, cycling, and car reduction.
- 2 residents do not agree with the proposals.
- LBN Public Health welcome the commitment to environmental justice.
- The Lea Valley Regional Park Authority said:
 - it is important to secure investment in localised enhancement schemes to address local environmental issues, and
 - it recommends a policy on the reduction of noise and light pollution to minimise poor air quality in the Lea Valley Park in order to improve visitor experience, and particularly given the rise in housing developments near the park.
- Natural England encouraged the recognition of the role of the natural environment in tackling climate change.
- London City Airport would like to engage with the Council on the Public Safety Zone guidance, and considers that it can help the Council bring about the proposed measures, as set out in its Master Plan, in ways such as maximising capacity, expansion, frequent surface access, and investment to reduce noise and air pollution.
- 1 resident said better information on recycling is needed.

Officer Response:

We welcome the support of policy changes, addressing the climate emergency in the borough.

With regard to concerns from respondents, the Climate Change Evidence Base sets out how the draft policies are achievable, financially viable and what they will deliver for the borough. Other policies and evidence base documents set out other ways that the climate emergency will be addressed – including air quality, flooding and active travel.

The Airport comments are noted and addressed in the Transport Policy T5.

Officers welcome comments recognising the importance of climate change in the context of flood risk. The importance of flood risk and climate change is set out in a standalone Policy CE7 Managing Flood Risk.

Future drafts of the policy will be informed by updates to Flood Risk evidence as directed by national policy, which includes assessing flood risk from all sources. The policy sets out requirements set by national policy to ensure developments are informed by a Strategic Flood Risk Assessment and to ensure design requirements reduce exposure to the risk of flooding elsewhere. Policy CE7 should be read in the round alongside Draft Policy CE8 Sustainable Drainage and policies encouraging better environmental design, including CE1 Environmental Design and Delivery, D1 Design Standards, GWS1 Green Spaces and GWS2

Water Spaces.

These policies all contribute to the overarching ambition to ensure the delivery of climate resilient development and tackle known issues relating to climate change.

Q2. Are there other changes we should consider?

- 4 residents said there is nothing else that needs to be considered.
- 81 comments from residents, developers, LBN Public Health, TfL, Thames Water, Port of London Authority, Newham Councillors, Historic England, Friends of West Ham Park, Climate You Change, and Environment Agency, provided general suggestions to address climate in Newham, including:
 - Improving cycling infrastructure and public transport, and reducing car use,
 - Encouraging energy-saving design, such as solar panels, retrofitting, and insulation,
 - Enforcing against companies/industries with poor environmental measures,
 - Addressing flood risk and providing tidal defences,
 - Incentivising green industries and green improvement in homes,
 - Providing guidance on environmental measures for residents, and involve the community to promote behaviour change,
 - Increasing biodiversity in ways such as re-wilding, protecting trees,
 - Addressing air quality impacts from London City Airport,
 - Progressing into net zero by following existing guidance,
 - Addressing light and noise pollution, although developers say it should not affect industries,
 - Improving recycling and reduction in water use,
 - Jointly working with relevant authorities,
 - Addressing pollution in blue spaces,
 - Implementing SuDS,
 - Addressing fuel poverty,
 - Promoting freight via river, and
 - Promoting greener eating habits.
- The Marine Management Organisation said:
 - proposals must assess the direct and indirect impacts upon local air quality and emissions, demonstrating avoidance, minimisation or mitigations in line with current national and local guidance, and
 - proposals in the South East Marine Plan Area should demonstrate lifetime resilience to climate change and coastal change.

Officer Response:

We welcome the various comments, suggestions and proposals from respondents on other changes that should be considered.

With the Climate Change Evidence Base supporting it, Policy CE2 sets out how Net Zero development will be delivered. The policy considers many of the comments of respondents, including net zero, green industries and fuel poverty. The policy also considers how we ensure the developments meet targets set, as well as ensuring that solar panels are delivered across the borough.

Policy CE5 also encourages widespread retrofit works across the borough, noting many of the comments made by respondents. Policy CE1 also addresses how reduced water use can be encouraged.

Sustainable Urban Drainage Systems are recognised by national policy as a positive approach to water management. Officers welcome the recognition of the use of Sustainable Urban Drainage Systems as a key component of the management of flood risk across the borough. Policy CE8 sets this out and promotes a more integrated approach to water management looking at the multi-functional benefits of implementing sustainable drainage in new developments. The benefits such as urban cooling, amenity and biodiversity are also reflected in Planning Practice Guidance.

In relation to flood defences, these are recognised as critical infrastructure to ensure the impacts of flood risk are minimised and reduced. As such, they are safeguarded and where required, Policy CE7 Managing Flood Risk and GWS2 Water Spaces stipulate that upgrades may be required. This process is undertaken in consultation with the Environment Agency and Newham as the Lead Local Flood Authority during the planning process. Contributions via development legal agreements may also be sought for upgrades to flood defences. The policy signposts the Thames Estuary TE2100 Plan, which sets out the approach to refurbishment and improving existing tidal flood defences in the borough.

Other comments, suggestions and proposals are addressed in other policies. The Transport policies contain detail on improved cycle infrastructure and public transport, where car use can be reduced. It also addresses London City Airport, and how efforts to meet net zero can be supported. The Waste policies outline how recycling levels can be encouraged. The Green and Blue Spaces policies outline how biodiversity will be increased in the borough, and how water spaces in the borough will be improved.

Some comments cannot be directly addressed through the Local Plan – such as promotion of greener eating habits. The Council's Environmental Health team will continue to enforce against companies that break environmental regulations and laws.

Q3. Is there anything missing?

- 4 residents said nothing is missing.
- 9 comments mentioned elements missing, including:
 - Addressing air pollution from Silvertown Tunnel,
 - Attracting green businesses,
 - Reducing car use,
 - Finding funding,
 - Improving environmentally-friendly design, such as solar panels and retrofitting, and
 - Restricting tall buildings.

Officer Response:

We welcome the comments by respondents regarding what is missing from the policy. Many of these comments – such as solar panels & retrofitting – are integrated into the policy, as well as other sections of

the Local Plan. For example, transportation, tall buildings and attracting green businesses are covered in other sections.

As previously stated, Silvertown Tunnel is a TfL project, noting that the Mayor of Newham has outlined her opposition to the project.

Q4. How do we encourage all developers to deliver net zero on-site today, and minimise retrofit costs in the next 20 years?

- 28 comments from residents, developers, the NHS Planning Development Unit, LBN Public Health, Friends of Queens Market, LB Redbridge, Fossil Free Newham, Mayor of London, and Monega Association provided suggestions to help deliver net zero, such as:
 - retrofitting,
 - setting targets,
 - enforcing uncooperative developers,
 - engaging with relevant industries to develop robust energy performance standards,
 - providing financial incentives,
 - implementing better government legislation,
 - encouraging green tech,
 - using high-quality design standards encouraging all new builds to be net zero,
 - favouring planning applications that seek to deliver net zero,
 - applying the London Plan's policy SI2,
 - promoting less polluting travel, and
 - avoiding unnecessary demolitions such as Carpenters Estate.
- London City Airport recognises the importance of the climate emergency and that more needs to be done, specifically supporting Newham to be carbon neutral by 2030, but said that the Council should let the airport grow whilst meeting net zero, which they are committed to by aiming to achieve the Level 4+ carbon accreditation and jointly working with industry partners and the Jet Zero Council.
- LB Redbridge commended how the proposed environmental standards go beyond the London Plan and recommended applying 'Be Seen' energy monitoring, circular economy, and whole life cycle carbon assessments to all major and minor developments, allowing for some exceptions.
- Climate You Change said the Council needs to enforce compliance with environmental standards for private developers, such as increasing insulation and fully draught exclude, and that the Council needs more environmental initiatives that are less costly, such as solar panels.
- Developers said that the policies should allow for flexibility and be outcome-focused, as opposed to being over-prescriptive.

Officer Response:

We welcome the range of suggestions to help deliver net zero. The Climate Change Evidence Base outlines how the policy has been developed to achieve net zero, with many of the suggestions considered and taken on board. The Evidence Base also outlines that the policies are achievable and financially viable.

The various targets in the energy policies do not prescribe ways to meet them – allowing developers flexibility in how to meet them. For example, although air source heat pumps are suggested, developers could also use direct electric heating or a heat network powered by heat pumps to meet the same targets.

We acknowledge the concern regarding the Carpenters Estate regeneration scheme, noting that this project currently falls under the London Legacy Development Corporation.

We welcome the support regarding the policy going beyond the London Plan standards, and agree with LBN Redbridge regarding applying London Plan planning guidance. We note that many retrofit actions for existing residential properties do not require planning permission. Regardless, Policy CE5 supports comprehensive retrofit works to be undertaken – ensuring that properties do not need to be retrofitted twice.

Some suggestions have been addressed in other policies – including encouraging active travel (T3), and supporting the London City Airport's desire to meet net zero targets (T5).

Policy CE8 ensures developments incorporate and design-in solutions as set out within the drainage hierarchy. Policy CE8 also recognises the multi-functional benefits of sustainable urban drainage. Reference to the regard to the Local Flood Risk Management Strategy in this policy also supports applications in their assessment of local flood risk and outlines measured actions to support objectives around minimising flood risk. This approach is aligned with London Plan Policies SI12 and SI13.

Q5. In some parts of the borough, the environment is harsh (windy, barren, poor air quality, too hot, bad smell) – how can policies mitigate the impact on residents, and prioritise interventions/improvements before issues arise?

- 26 comments from residents provided ideas on how to mitigate issues with harsh environments, including:
 - Applying high building standards such as efficient home insulation, using defensive architecture and structures imaginatively such as using trees and vegetation to address wind and barren environments, and retrofitting,
 - Better implementation of interventions such as planting more trees, promoting water features, creating car-free zones near schools, improving housing design, and Low Traffic Neighbourhoods,
 - Addressing impacts from London City Airport,
 - Introducing sound barriers and operating hours in industrial areas to mitigate bad smells and improve air quality, such as addressing the foul smell and removing heavy polluters in Beckton,
 - Involving residents and setting up a line of communication so residents can raise concerns with the Council,
 - Promoting active travel and sustainable travel options, and reducing traffic, and
 - Monitoring and gathering data (and make it publicly-accessible) to have early warning systems that can help improve the environment by introducing controls.
- 15 comments from residents, developers, Historic England, LB Waltham Forest, Environment Agency, Marine Management Organisation, LBN Public Health, and the Royal Docks Engagement Team, raised concerns over poor air quality, mentioning:
 - that high death rates occur as a result of it,
 - that monitors and the Air Quality Action Plan are not enough, and
 - that it should be a priority, including addressing issues with Silvertown Tunnel.
- Mayor of London supports the proposed better use of air quality data in order to reduce exposure through design and carrying out ongoing monitoring, as per London Plan policy S11.
- Climate You Change highlighted the issues with burning household rubbish.

Officer Response:

We welcome the suggestions and proposals by respondents to mitigate the harsh environment that is prevalent in some areas of the borough.

Many of these suggestions have been integrated into the policy, including efficient home insulation, designing schemes with harsh environments in mind, as well as encouraging retrofitting older developments.

Consideration of foul smells and poor air quality in Beckton has been considered in the Neighbourhood and Utility policies, as well as in the agent of change in the Design policies.

Some of the responses have been addressed in other policies - the Transport policy encourages active travel, reducing car use and low traffic neighbourhoods, for example. The Transport policy also has a dedicated Airport policy.

We note the concerns regarding poor air quality in the borough, Policy CE6 comprehensively considers air quality and how this will be improved. The Transport policy will also assist in improving levels of poor air quality, through a reduction in car use generally and take up of electric vehicles.

Some comments are out of the scope of this Local Plan – including reducing operating hours of existing developments and burning household rubbish. As previously stated, Silvertown Tunnel is a TfL project, noting that the Mayor of Newham has outlined her opposition to the project.

Q6. What else should be included in this policy to ensure Newham is maximising opportunities to reduce the risks of fluvial and surface water flooding?

- 24 comments from residents, developers, and Mayor of London provided suggestions to reduce the risks of flooding, including:
 - Upgrading flood defences through green solutions, including Beckton Treatment Works and Thames Barrier
 - Following flood risk guidance and NPPF policies
 - Working jointly with other boroughs
 - Cleaning drains from blockage and enforcing it
 - Incentivising removal of concrete, such as by re-assessing car parking spaces
 - Improving biodiversity and increasing greenspaces
 - Distributing sand bags
 - Providing guidance for residents and incentivising through grants
 - Extending existing approach to SuDS, in line with London Plan policies SI12 and SI13
- Thames Water:
 - explained how water/sewage infrastructure is sometimes necessary in flood risk areas given the need for them to be close to rivers, but that it is likely that these will need to be upgraded to meet needs of increased housing capacity
 - said the policy should make reference to 'sewer flooding' and that flooding can occur away from flood plain
 - highlighted that it is the developer's responsibility to provide for drainage to sewers to reduce quantity of surface water entering the sewage system in ways such as using SuDS, in accordance with London Plan policy SI13

Officer Response:

We welcome the suggestions and measures to reduce the risk of flooding (from all sources). We acknowledge the public engagement responses from residents and developers highlight that flood risk (including surface water flooding) is a critical issue for the borough, particularly in the context of the climate emergency. At a local level, the policy responds to key local flood risk issues with a presumption against hard standing as a principle. Added reference to update local and best practice guidance responds to respondents' suggestions for more local design guidance around sustainable drainage alongside promoting better management of water use in new developments.

Updates to the flood risk and drainage policies will be informed by and required to implement recommendations of the update to the 2017 Strategic Flood Risk Assessment. This is a statutory document set by national policy. The study informs policies and site allocation requirements by assessing the risk of flooding from all sources. The study will incorporate up-to-date climate projections, analyse the impacts of flood risk in the borough and set out measures for developments to manage flood risk so it is mitigated not increased. This is in conformity with Policy SI13 of the London Plan.

A principle objective in the Draft Flood Risk Policy requires all new development to reduce people and essential infrastructure exposure to flood risk through the submission of a flood risk assessment as set out by national policy and applying technical and design requirements to reduce and mitigate this risk. The policy requires developers to apply measures to mitigate and reduce flood risk from all sources – including those recognised in the London Plan such as Sustainable Urban Drainage Systems – and apply a more integrated approach to water management that encourages greening and water reuse.

The importance of protecting infrastructure, particularly sewer capacity and flood impacts on the sewer network, is recognised in the policy. Policy CE8 promotes the drainage hierarchy to ensure new developments incorporate these principles such as water reuse into scheme design. This includes reducing water entering the sewers through various design measures recognised. The policy references the Sustainable Urban Drainage Systems local guidance and requires developers to implement high-quality designs (as recognised by the London Plan) to reduce the risk of flood elsewhere, including that on the sewer network.

Approaches to delivering effective flood risk design measures and mitigation should be read alongside the Utilities policy to ensure new development does not impact further on sewer capacity alongside green, and the Water Spaces and Climate Change policies to reduce run off and increase the risk of flooding. Policy CE8 has been updated to promote a more integrated approach to water management. This will require developments to consider the multi-functional benefits i.e. biodiversity, amenity to better implement sustainable drainage solutions that support a range of Local Plan objectives. This aspect of the policy should be read alongside CE1 Environmental Design, GWS1 Greenspaces and GWS2 Water Spaces, which all promote more sustainable solutions and infrastructure upgrades.

Q7. How can Newham assess the potential for overheating of new buildings, and how can Newham monitor the following delivery of a development?

- 18 comments from residents, LB Redbridge, Fossil Free Newham, and Mayor of London provided suggestions, including:
- Addressing issues with air conditioning,
- Restricting heat networks because of their emissions,
- Restricting housing design that causes overheating and controlling poor design practices,
- Encouraging good design such as air flow, dual aspect, passivhaus, and heat sensors,
- Applying government legislation and monitoring,
- Working jointly with the Environment Agency, and
- Restricting tall buildings.

Officer Response:

We welcome the suggestions and measures to address overheating in new developments. The Climate Change Evidence Base contains guidance regarding overheating for both developers and Council planning Officers, with many of the suggestions and measures noted.

The policy expands on the Evidence Base, ensuring that overheating is considered in new residential buildings. Some comments are addressed in other policies – including the Zero Carbon and Tall Building policies.

The Environment Agency are recognised as a statutory stakeholder in the planning process around flood risk issues. Policy CE7 Managing Flood Risk requires all new developments to liaise with the Environment Agency on all flood risk matters, including flood defence improvements and sustainable drainage solutions as part of scheme design. This is encouraged at the earliest stage to better implement measures from the outset. The Environment Agency are consulted as part of the Local Plan process to ensure the policy is fit for purpose.

The workshop for Climate was combined with the workshop for Greenspaces & Waterspaces. See the Greenspaces & Waterspaces section above for findings on Climate.

Officer Response:

We welcome the support for retrofitting across the borough, and the improvements it will deliver. We note the issues raised by respondents regarding London City Airport and poor air quality. The Transport policy has a dedicated Airport policy in light of many comments and suggestions.

We welcome the comments regarding our ambitious targets.

Q1. Do you agree with the proposed changes?

- 21 respondents, including residents, LB Waltham Forest, and NHS Urban Development Unit, agree with the proposed changes, specifically:
 - the support for high quality cycle parking (in line with London Cycling Design Standards),
 - an equal distribution and access to sustainable travel,
 - the delivery of the Health and Wellbeing Strategy,
 - healthy streets and school streets,
 - LTNs,
 - trams,
 - investments in public transport enhancements, and
 - compliance with national and local guidance.
- 2 respondents agree in part, specifically one resident said it is better to make cars greener rather than reducing their usage.
- 3 respondents disagree with the proposed changes, two of them saying there is nothing proposed on active travel and car use reduction.
- Developers support INF1, the Healthy Street principles, and are committed to reducing poor air quality by ways such as promoting sustainable modes of transport.
- 1 resident voiced that Silvertown Tunnel should be dug and used only for electric cars.
- LBN Public Health supports the proposed changes and the application of the Healthy Streets Approach, and it also explained how the transport system impacts on health in multiple ways, and its unequal distribution enhances socio-economic inequalities.
- Fit for Walking said that new residents should not be allowed on-street parking permits and that minor roads should be cut from car usage.
- 1 resident and Canal & River Trust said that transport needs to improve in order to address environmental justice.

Officer Response:

We welcome the support of the proposed changes from respondents, with suggestions and proposals integrated into the new policies. The Council is currently undertaking a Sustainable Transport Strategy in conjunction with the Highways and Transport team – and the detailed suggestions and proposals from respondents are also being considered as part of that work.

The proposed policies strongly encourage active travel (T2) and car use reduction (T3). We disagree that car use does not need to be reduced, however the policy does encourage the use of greener vehicles, with electric vehicle charging points (T3).

We note that the Silvertown Tunnel is a TfL project, and that the Mayor of Newham does not support the project.

We welcome the support of LBN Public Health, noting the Healthy Streets Approach in the policy (T2).

We acknowledge the comments from Fit for Walking regarding on-street parking permits for new residents, noting that parking permits are the responsibility of another team in the Council. We are ensuring that all new developments will be car-free (with the exception of blue badge spaces) (T3).

We also acknowledge the comments regarding environmental justice, and believe that the proposed policies will assist in improving the local environment, increase connectivity and deliver high-quality public transport for Newham.

Q2. Are there other changes we should consider?

- 4 residents said that no other changes should be considered.
- 4 residents suggested revisiting cycling facilities, including improving and implementing more lanes, creating safer cycle parking spaces, and providing storage for cyclists.
- 4 residents mentioned the topic of parking, including parking on alternative sides of the road, implementing alternatives to car usage, standardising parking costs across the borough, removing street parking, creating more electric car charging points, and creating car clubs.
- Newham Cyclists said disability parking could be improved and that there needs to be more specific information about how deliveries will be handled.
- Fit for Walking:
 - recommends placing parking to the edges of housing development so if the space is unused it can become a greenspace,
 - suggests that attention needs to be given to crossovers, including how to reduce any risks for children and people with impaired vision,
 - there should be a pedestrian-only route for new developments,
 - pedestrians need to be prioritised over kerb access, and
 - supports the extension of the bus network, as they are more flexible and cheaper.
- Thames Water said that the Safeguarding Direction and designation on the Local Plan should be removed.
- CPRE said that the priorities should be: delivery hubs, a kerbside hierarchy principle whereby cars are least prioritised, land use prioritised for buses, increased sustainable mode share and less traffic, shared mobility hubs to support reduced car ownership, active travel, and LTNs.
- TfL said:
 - to focus on car-free developments by supporting a range of transport services,
 - apply Delivery & Servicing Plan and focus on active travel for 'last mile' logistics,
 - apply Construction Management Plans, especially when several nearby developments are coming forward at the same time,
 - carry out Active Travel Zone Assessments to deliver Healthy Streets,
 - protect and safeguard bus routes, and
 - reference to TfL's current financial position, Beckton Riverside and Thamesmead, and recognition of how transport infrastructure unlocks housing capacity.
- Developers and residents support the potential for distribution centres and micro fulfilment centres and implement timed slots for deliveries to address impacts of deliveries.
- Other changes that should be considered according to respondents are to make all stations accessible, ban electric scooters, install CCTV for enforcement, address the consequences of LTNs, prioritise pedestrians, and widen pavements.

Officer Response:

We welcome the detail of changes proposed by respondents – these are also being considered as part of the Sustainable Transport Strategy.

Support of efforts to improve modal shift, deliver active travel improvements and enhance accessibility is welcomed, and integrated in policies T2 and T3. Details regarding cycling facilities will be considered in detail in the Cycling Strategy, part of the Sustainable Transport Strategy work – however, Policy T3 does enhance the level of cycling provision above the level of the London Plan.

We also welcome the variety of suggestions around parking, with Policy T3 including specific guidance on disability parking, encouraging car clubs and discouraging future growth in car use through car-free development.

We also welcome the support of efforts to improve public transport, including the flexibility of buses as well as larger infrastructure projects. We acknowledge that transport infrastructure unlocks housing capacity, with support in T1 for this. Noting TfL's financial position, the Sustainable Transport Strategy will set out a range of interventions that Newham and others could deliver, depending on the quantity of investment available.

The dedicated deliveries and servicing Policy T4 considers many of the points raised, including active travel for last mile journeys, guidance on deliveries as well as micro distribution/fulfilment centres.

With regard to the potential removal of the Thames Gateway Bridge Safeguarding Direction, it is not within our gift to remove it. However, we will discuss this with Transport for London in light of the Silvertown Tunnel and the potential quantum of development in the Beckton Riverside area.

We do note that some suggestions – such as the cost of parking, the removal of existing on-street parking from Newham's roads and the banning of electric scooters – are not within the remit of the Local Plan.

Q3. Is there anything missing?

- 2 residents said nothing is missing.
- 5 residents said that better cycling provision, increasing cycling lanes, engaging with local cyclists, and more bike hangars are missing.
- 2 residents said that more LTNs are needed.
- 4 residents mentioned the need to have more accessible parking, wider pavements, and improved public transport.
- 1 resident said that more in-depth detail and analysis is needed.
- Developers said that the loss of bus top countdown displays needs to be addressed.
- 7 respondents, including LBN Public Health, Fit for Walking, Sport England, and Climate You Change, said public transport needs to be more accessible, such as serving key places like hospitals or adding lifts to stations.
- Thames Water and Port of London Authority highlighted the need for more river crossings.

Officer Response:

We welcome the various suggestions and proposals from respondents regarding what is missing from the policy. As before, these suggestions and proposals are also being considered as part of the Sustainable Transport Strategy – this will provide the in-depth detail and analysis that one resident desires.

Low Traffic Neighbourhood coverage and cycling provision in the borough will be considered in the Sustainable Transport Strategy, however both are strongly supported in the policy as part of the delivery of 15 minute neighbourhoods (T2).

Improvements to cycling provision is also strongly supported in Policy T2, strengthening the quality of cycling parking and encouraging more cycling infrastructure. As before, this will be expanded on further in the Cycling Strategy of the Sustainable Transport Strategy.

Newham already has a comprehensive network of public transport connecting key destinations – comments regarding the accessibility of the public transport network will be considered as part of the Sustainable Transport Strategy.

We note the desire for improved public transport, including countdown displays and improvements to accessibility and mobility more generally (T2) – addressing concerns of several residents.

We acknowledge the request for more river crossings – these strategic transport projects are the responsibility of TfL. Policy T1 outlines what these strategic transport projects should deliver.

Q4. How can Newham gain greater coverage of electric charging points across the borough?

- 6 residents said lampposts need to be converted in car charging points.
- Fit for Walking, Monega Association, and 5 residents said charging points need to be found in all parking spaces, car parks, in front of homes, petrol stations, and new developments in order to create a network of charging points.
- 4 residents have voiced their concerns over electricity cables crossing footways and pavements to charge cars and the safety hazard they lead to, and Fit for Walking said they should not be located on the footway and their potential hazard should be assessed.
- 1 resident said that charging points at home should be subsidized.
- 1 resident said that electric cars should not be encouraged over active travel.

Officer Response:

The support for electric vehicle charging points by respondents is welcomed, acknowledging that the policy will prioritise active travel and public transport over electric vehicles (T3).

We agree that electric vehicle charging points should not obstruct pedestrians and should be integrated in the streetscape, as per the various issues raised by respondents. We also agree that a network of charging points should be located across the borough, and the Sustainable Transport Strategy will look at this in greater detail in an Electric Vehicle Charging Point Strategy.

The policy also seeks contributions for electric vehicle charging points from car-free developments, to deliver charging points elsewhere in the borough (T3).

Subsidising electric vehicle charging points is outside the remit of the Local Plan. Furthermore, we wish to encourage active travel and public transport over electric vehicles.

Q5. Do you have any further ideas on how to encourage a reduction in car use and greater use of active travel modes?

- 10 respondents, including Climate You Change, LBN Public Health, Mayor of London, and developers, mentioned opposing perspectives on car usage, some wanting to ban it, and others voicing that the current restrictions are unfair for people who need to use the car.
- 21 residents, together with LB Waltham Forest and Climate You Change, mentioned cycling in their answers, including setting up cycling rental schemes, improving cycling infrastructure, creating safer cycling routes, holding cycling events, reducing business rates for bike shops, working with existing organisations (i.e. Cycle Sisters) establishing more cycle parking (bike hangars), and enforcing speed limits.
- 3 residents voiced the need to push for active travel, following the London Plan standards, improving public facilities such as toilets and lockers, and making it an accessible, cheaper, and easier option than using the car.
- Developers and residents supported car-free new developments, with alternatives such as car clubs, cycle parking, and EV charging points.
- 8 respondents, including Climate You Change, mentioned EV vehicles and how they need to be subsidised, regulated, and need better infrastructure to accommodate them.
- 9 respondents, including Climate You Change and developers, said that there needs to be more parking enforcement, capped car speed at 20mph, and an evidence-base of adequate locations for parking.
- 4 residents said public transport needs to be more widely available and more affordable, and it needs to be incentivised.
- 11 respondents, including Lea Valley Regional Park Authority, promoted the reduction of car use, with ideas such as pedestrianizing high streets, creating more school streets and low traffic neighbourhoods, reducing deliveries, and widening congestion charges.
- 7 respondents, including Fossil Free Newham, mentioned the need to develop a network for walking around the borough, making it more accessible and healthier, and promoting the 15-minute neighbourhood concept.
- 5 residents said that safety needs to improve by enforcing speed limits and reckless driving.
- Newham Cyclists:
 - recommends specifying that applications will be refused if they do not meet basic minimum standards as per the London Plan,
 - emphasised that net zero should be achieved by improving access and quality of public transport as opposed to promoting private electric vehicles, and
 - condemns the lack of enforcement and inadequate parking restrictions.
- Fit for Walking:
 - Examples of schemes that should be funded by CIL: auditing of footway quality, end illegal pavement parking, safe crossing places, pedestrian-only route on all junctions, provision of resting points, borough-wide walking network,
 - Apply the Cycling and Walking Infrastructure Strategy,
 - Make developments permeable so everyone can walk through them, and
 - Improve lighting, safety campaigns, emergency facilities, wide footways to make streets more open and safer.
- TfL:
 - welcomes the emphasis on active travel and the role of transport in connecting 15-minute neighbourhoods, and
 - strongly supports car reduction to align with the London Plan and further parking restrictions in certain areas which they can help identify, with a case by case approach to consider exceptions.

Officer Response:

At the outset, the wide variety of suggestions and comments will be explored further in the Sustainable Transport Strategy.

We acknowledge the conflicting responses to this question, noting that some residents and businesses do need a vehicle to get around the borough. We believe that the policies strike a careful balance of encouraging active travel, public transport and discouraging unnecessary car use (T3) – while supporting residents and businesses that do need a vehicle to transition to active travel (e.g. cargo bikes) and sustainable modes (e.g. electric vehicles). We welcome the support for car-free development, low traffic neighbourhoods and school streets from respondents.

Fit for Walking's comments regarding the quality of the urban environment for pedestrians will be covered more broadly in the Walking Strategy, as part of the Sustainable Transport Strategy. Key principles are embedded in the policies, including the Public Realm Net Gain policy.

As mentioned by many respondents, the policies also include details on permeability and safety, improving cycling & walking networks (15 minute neighbourhoods) and access around the borough,

As previously mentioned, Policies T2 and T3 strengthen cycling provision, including improving cycle hire, improving the quality of cycling parking and delivering cycling infrastructure. We welcome the various suggestions to improving active travel – with Policy T3 ensuring that showers and changing facilities are available at commercial and industrial developments.

We agree with Newham Cyclists and others that public transport and active travel should be prioritised over electric vehicles to achieve Net Zero. As previously mentioned, the policies tread a fine line between discouraging car use, and encouraging people that do need vehicles to convert to electric vehicles. This includes policies on electric vehicle charging points, and how they should (or should not) be integrated into the urban environment (T3).

Noting that the affordability of public transport is outside the remit of the Local Plan, the various Transport policies make efforts to improve the quality and availability of public transport.

Some of the suggestions and comments – such as reducing the business rates for bike shops, borough-wide speed limits or concerns regarding inadequate parking restrictions – are outside the remit of the Local Plan.

Other themes:

- 12 respondents, including Mayor of London, developers, and Port of London Authority, mentioned deliveries and how their logistics can be improved to address air pollution and traffic, in ways such as using the river to transport.
- 15 respondents, including Fossil Free Newham, London City Airport, and developers, mentioned London City Airport, acknowledging its importance in the local economy, but showing concern for the number of flights and the noise pollution.
- 2 residents said there are poor transport connections to South London and Redbridge.
- 4 residents voiced their opposition to Silvertown Tunnel.

Officer Response:

Deliveries and logistics are a key issue in the borough, and these comments are reflected in a deliveries policy (T4). This includes efforts to make deliveries and logistics more sustainable, especially with last mile deliveries.

A range of comments regarding London City Airport are also acknowledged, and these comments are reflected in the Airport Policy (T5).

Strategic transport projects – such as potential connections to south London and Redbridge – are covered in policy T1.

As before, the Silvertown Tunnel is a TfL project, and the Mayor of Newham has outlined her opposition to the project.

Below are the responses provided in the un-facilitated and facilitated workshops.

OUR TRANSPORT



Discussion Summary

- There was broad support for the proposals in the group with some scope for changes. The main concern was that **two of the proposals are currently worded in a way that potentially encourages car use**. Specifically, this is related to electric vehicle charging and targeted parking provision. Members of the discussion felt that the if we are to reduce car use and car dominance, then we **need to discourage all types of car use and encourage more active travel**.
- A lot of the discussion focused on the **best approach to ensure these proposals could be met**. There was a range of views on the barriers and opportunities to supporting active travel and reducing car use. Some members of the group felt that the best approach was to encourage active travel and behaviour change with positive messages. Other members of the group felt that far more needed to stop car use from being so convenient. e.g. reducing parking availability. There was broad agreement that **we will need to do both 'carrot' and 'stick' approaches** and that planning policy could support this.
- There were some interesting ideas that will be explored further. This included thinking about how we use active travel for the last mile (or five miles) for deliveries across Newham. This might include the **need for depots where goods could be transferred to cargo bikes** or other forms of transport.
- This idea was an example of a theme that ran through the session, that we **need a systemic approach to the challenges of supporting active travel** and that all the proposals are interconnected. The cycle infrastructure in Newham was highlighted as an area where it didn't feel joined up across the borough and this (as well as other reasons) meant **people don't always feel safe to cycle**.

Jamboard Comments

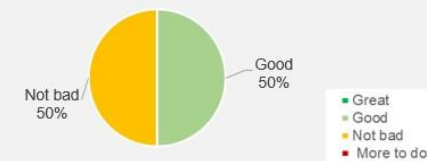
Need cycle lanes which follow strategic routes that people want to use

Ambition needs to be stronger - big change can happen quickly

Local businesses - need space to consolidate deliveries

Don't see how you can achieve 4 while also achieving 3

From the information you have had so far, how do you feel about the proposals?



Good 50%

Not bad 50%

Legend: Great (green), Good (light green), Not bad (yellow), More to do (red)

Proposals discussed

1. Strategic Transport projects (electric buses and DLR extension to Thamesmead)	4. Greater focus on reducing car use and car dominance
2. Low Traffic Neighbourhoods, School Streets and cycle lanes	5. Targeted parking provision (key workers, disabled parking etc)
3. Prepare for a Zero Carbon future – electric vehicle charging	6. Reduce impacts of deliveries

WE ARE NEWHAM.

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People at the Heart of Everything We Do

WE ARE NEWHAM.

BUILDING A
FAIRER
NEWHAM

Workshop Theme	Jamboard Summary
Transport 20/11/21	Walking/Cycling - Tend to walk or cycle in Newham Not sure how – can TfL cycle hire be extended to Newham. This will reframe how people see the size of the borough. Distance - 1hr10 from Woolwich Ferry to Stratford, 50mins from east side of borough to west. Borough is very compact and accessible. People are unaware how easy it is Gallions Reach feels a huge distance from Stratford. Car dependency - Surprised people feel dependent on their cars. Not sure why Newham is so car dependent – large increase in the last 10/15 years in number of cars No need for car – live in Royal Docks – easy to get to transport Newham – car dependent borough Parking - Some anger around parking – cost of parking – traffic measures use underused car parking spots for green infrastructure Infrastructure - Good public transport in Newham Transport infrastructure is good General - Ambitious targets – if the Council is committed!
Transport 29/11/21	Electric vehicles – Electric vehicles – very expensive! On one hand – you want to reduce number of cars, on the other hand, you want to encourage electric vehicles. Petrol crisis – changed people’s opinion on owning a car Public transport - Problem with encouraging people to use public transport is the lack of toilet facilities at stations and on buses Really good transport links. Royal Docks – by Cable car! Cycling – segregated bike lanes, not a white line! Sometimes need to take to the pavement. Dangerous for pedestrians! If roads are safe – you get more people cycling! Cycle local. 10/15 minutes by bike. Prefer quiet roads. Improve cycling infrastructure – more cycle lanes segregated from traffic – rolled out across the borough “73% BAME – Sari/African dress – you can’t ride a bike” Pushback – improve safety to get more people riding Cycle traffic lights – more of them! Improve safety Low Traffic Neighbourhoods – “82% opposed” – pushing traffic to poorer neighbourhoods. Would not be supportive of more. Ambulance, Fire and Police delays. Car dependency -

	Local Newham congestion charge. Flippant yes, controversial yes – but why not. Dependency on vehicles. Too many people reliant on vehicles. A habit! School run is a typical example. 2 minutes from home – and they drive! How to get people to use active travel to get to school. Other - How can you reconcile these proposals with Silvertown Tunnel and West Silvertown Lorry Park Street lighting – poorly lit. Anti-social behaviour, not very safe to walk, especially at this time of year (November). Discourage anti-social behaviour, improved safety
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Officer Response:

Major developments will contribute towards cycle hire provision, and the Sustainable Transport Strategy will explore what cycle hire needs to be delivered in which parts of the borough (T2). Comments regarding the size the borough and how people are unaware of how easy it is to travel across the borough – Policy T2 supports wayfinding and signage, with other policies encouraging permeability and networks to improve this.

As previously mentioned, these policies balance the need to discourage car use (and encourage active travel and public transport) and encourage a move to electric vehicles for people & businesses that need them. Points regarding parking are generally outside the remit of the Local Plan, noting that Policy T2 supports improved public realm and green infrastructure around parking. We welcome the various suggestions on how to reduce car dependency. As previously mentioned, this will be explored further in the Sustainable Transport Strategy.

The support for the ambitious targets are welcomed, and will be expanded on further in the Sustainable Transport Strategy.

We welcome support for segregated bike lanes – although supported in the policies, details will be explored further in the Cycling Strategy as part of the Sustainable Transport Strategy. This will help to improve safety and confidence in cycling in Newham.

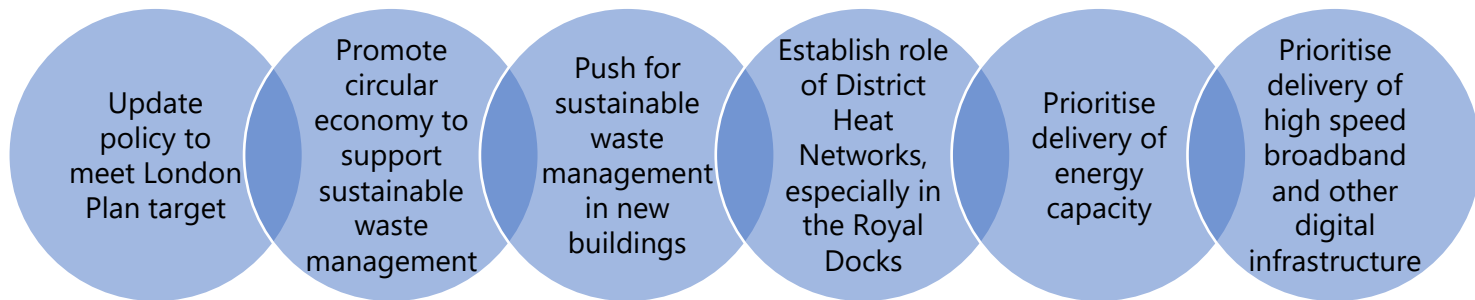
We disagree with assertions that Newham residents do not support Low Traffic Neighbourhoods, in light of responses received in this consultation and wider work on Low Traffic Neighbourhoods. This policy supports Low Traffic Neighbourhoods, and the Sustainable Transport Strategy will explore the rollout of them across the borough.

As previously mentioned, the Silvertown Tunnel is a TfL project, and the Mayor of Newham has outlined her opposition to the project.

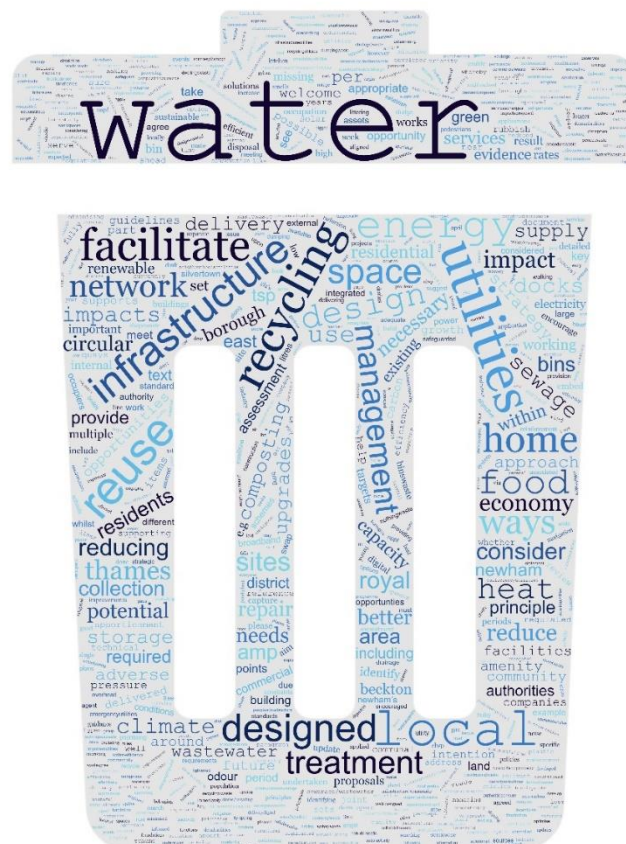
5.12 Waste & Utilities

This theme focuses on how the appropriate management of waste and utilities can create a healthier environment and improve vital services. The policy seeks to address waste in a sustainable manner by minimising impacts on the environment whilst securing sufficient utilities for new developments.

The proposed policy changes include:



This theme received 133 comments from 44 representors.



Q1. Do you agree with the proposed changes?

- 17 respondents agree with the proposed changes, including residents, developers, LBN Public Health, and LB Waltham Forest
- 3 residents mostly agree, two of them saying it needs to go much further
- 4 respondents do not agree with the proposed changes, claiming the proposals are not strong enough or ambitious, and are missing a policy on heat capture from waste
- The Mayor of London welcomes the intention to safeguard existing waste sites to meet targets and welcomes that work has begun to update the East London Waste Plan
- The Canal & River Trust supports the application of circular economy to reduce waste
- Overall support over meeting NPPF and London Plan targets, as well as promoting circular economy principles, and prioritising energy capacity and digital infrastructure

Officer Response:

We welcome the broad support for the proposed changes to the Draft Waste and Utilities Policies, and acknowledge the comments around the policies needing to be more ambitious. Policy W1.1 sets the expectation that the management of waste in Newham should follow the principles of the circular economy, retaining materials in use for as long as possible. The Draft Local Plan policies provide further detail on the changes proposed through the Issues and Options document, with the changes proposed in the Plan drafted to be in broad conformity with London Plan policies.

The Draft Local Plan safeguards existing waste sites through Policy W1.3 in accordance with the requirements of the London Plan, and sets out the borough's intention to meet the waste apportionment target for the borough set out in the London Plan (W1.2). We have jointly commissioned an evidence base for the Joint Waste Plan, and intend to continue working with our east London neighbours to ensure sufficient management capacity is safeguarded across the sub-region.

While the draft policies have not specifically referenced heat capture from waste, the London Plan sets out strategic policies around the opportunities to utilise energy from waste plants across the capital. This is a matter which is more appropriate to plan for at a regional level, as we cannot control where these uses are brought forward across London.

Officers welcome support for digital infrastructure and the role of digital connectivity as part of modern neighbourhoods, including the economy.

Q2. Are there other changes we should consider?

- 5 respondents said nothing should be changed
- Thames Water expressed its will to co-operate in delivering improved infrastructure as well as its support with a proposed text for a specific policy addressing water infrastructure, highlighting the importance of such in order to avoid adverse environmental impacts
- LB Redbridge recommended that the policy text on improving recycling and reducing the need for processing facilities should be considered as part of the updates to the circular economy
- The Environment Agency said:
 - that the Local Plan needs to improve the water supply to contribute to its security and recommends using the Integrated Water Management Strategy and the Water Resource Management Plan
 - that the proposals need to do more to reduce pressure on water supply and infrastructure, perhaps through an integrated water management approach for large developments
 - that the Royal Docks Integrated Water Management Strategy needs to be referenced
 - that multiple infrastructure projects should be enabled at the same time to minimise costs and disruption
- 1 resident mentioned the need to involve young people in innovation methods
- 1 resident said more is needed on heat capture from waste
- 3 residents voiced the need to improve recycling processes, such as introducing food waste in the borough, allowing residents to choose which bins they want, and standardising recycling procedures
- Others highlighted the need to focus on refurbishment and payment schemes for repairs and services

Officer Response:

We welcome the feedback on other changes to consider for the Waste and Utilities Policies. Policy W1 of the Draft Local Plan sets the objectives for the management of waste and the principle that development of waste management facilities in Newham should follow the circular economy (W1.1). As per the response to Q1, the London Plan sets out strategic policies around the opportunities to utilise energy from waste plants across the capital.

We acknowledge the comments around residents having access to food waste collections and allowing for standardisation of recycling procedures. While borough-wise food waste collection services and recycling procedures can only be introduced by Newham's Waste and Recycling team, Policy W3 requires that new major developments submit Waste Management Plans. These should set out how dwellings are able to meet storage requirements for future food waste collection services, and provide waste storage facilities designed for ease of use and collection. They also require new developments to design-in flexibility to allow for future changes in Council services. Policy W3.3 also seeks to encourage reuse by residents in major developments, by providing a dedicated area for residents to leave items for other residents to use, or share tools to allow for repairs and refurbishments. In terms of building refurbishment opportunities, this is addressed through the Draft Local Plan's Policy on Retrofit (CE5).

The policy does allow for more innovative waste management collections systems in new developments (W3.7), however these should be discussed with the Council's Waste and Recycling teams to ensure the implementation of these facilities are feasible.

Policy W4 recognises that the assessment of all new, expanded and upgraded utilities infrastructure must consider a range of impacts, including environmental, to support the policy objective. This also includes emphasis on capacity and infrastructure sufficiency as a key component of sustainable development.

The Integrated Water Management Strategy approach (emerging document) is referenced in the Flood Risk policy (CE7) as this linked to water management and demands, drainage and flood risk solutions. However, water infrastructure capacity and sufficiency is a key consideration as referenced in the Utilities policy, and should be read in conjunction with other policies in the Plan. The climate change and other infrastructure policies all seek to deliver more sustainable measures to reuse and better manage water in a more integrated way.

Q3. Is there anything missing?

- 3 residents said nothing is missing
- 1 resident said that financial support is missing
- 1 resident said more is needed on heat capture from waste
- 1 resident said there needs to be more on recycling improvements
- The Canal & River Trust encourages engagement with residents to improve looking after the canal environment and addressing litter on water networks

Officer Response:

We acknowledge the additional comments on what is missing from the policy. Policy W3 requires new developments to provide waste management storage that complies with Newham's up-to-date waste management guidelines, including well-designed recycling storage facilities. As per the response to Q1, the London Plan sets out strategic policies around the opportunities to utilise energy from waste plants across the capital. The Local Plan cannot control the cost of waste collections or issues of littering, as these are managed at a borough level by the Council's Waste and Recycling and Law Enforcement teams.

Q4. Are there ways your home could be better designed to help you recycle or reuse more?

- 5 respondents support the proposed policy changes for design, recycling rates and circular economy so to recycle and reuse more, with one respondent supporting reduced food travel times.
- 17 respondents suggested ideas to recycle and reuse more, including: increasing space for waste in communal areas, improving waste collection, improving internal design of waste space within dwellings, retrofitting, and incentivising companies to be greener
- Developers said they support the incorporation of the circular economy, which they consider important to support sustainable waste storage in new developments, particularly those larger sites that take years to construct
- Mayor of London supports the proposal for the design of new developments to encourage recycling but thinks more could be added on well-designed spaces for collection of waste
- LB Redbridge supports the ambition to deliver a joint waste plan as Redbridge also has low recycling rates, and also said that the policy should include retrofitting of existing facilities such as communal or on-street solutions to waste storage
- Climate You Change said:
 - Promote repair events for residents to fix broken goods, which will overall push for reducing waste as well as create new jobs, and could be located in Queen's Market or at the Royal Docks
 - The Council needs to better inform residents (particularly children) about composting, including the Council's reduced-price compost bins, and community composting should be set up in parks and community gardens
 - Recycling of construction waste need to improve
 - The Council needs to promote the reduction of single-use plastic and locally-sourced food to lower the carbon footprint

Officer Response:

We acknowledge the feedback around ensuring design helps facilitate reduction and recycling of waste. Support for circular economy principles has been set out in Policy W1.1, while Policy W3 seeks to secure well-designed waste storage facilities in new developments. Circular economy principles are supported through Policy CE3.2.b, which encourages reduction of waste through the construction process.

The Local Plan cannot influence the frequency or location of waste collections, as this is administered by the Council's Waste and Recycling team, and cannot direct local sourcing of food or reduce use of single-use plastics. However, Policy W3 seeks to ensure ease of waste management and collection in new developments, including non-residential developments. This can help residents dispose of and recycle their waste efficiently through providing enough waste storage for different waste streams, both within dwellings and communal waste and recycling stores.

We welcome comments from LB Redbridge on support for progressing with an update to the Joint East London Waste Plan. This document will ensure East London has capacity across the sub-region to manage both Local Authority Collected and construction and demolition waste streams.

We also welcome the support for encouraging greater waste reduction and reuse. While the Local Plan cannot influence events in the community that encourage waste reduction, we have introduced

requirements for new major housing developments to provide a circular economy room to encourage waste reduction among future residents (W3.3). Requirements for Waste Management Plans also require applicants to consider the provision of on-site composting facilities for major developments (W3.2).

With regard to comments supporting retrofit of existing buildings, it is anticipated that where such proposals require planning permission, or are part of a wider masterplan, that a site's Waste Management Plan will consider waste disposal improvements in line with Newham's most up-to-date waste management development guidelines.

Q5. How can planning support the delivery of inclusive digital infrastructure?

- National Grid recommended applying the Utilities Design Guidance, and encouraged that new developments near National Grid infrastructure respect site constraints and take a coordinated approach
- The Mayor of London said the proposed changes should align with the London Plan's policy SI3 and notes that Newham falls under a Heat Network Priority Area, which is an opportunity for low carbon heat networks, as seen in the draft OAPF's recommendations such as the Local Area Energy Plan
- LB Redbridge supports updating the East London Waste Plan to reflect the circular economy, update safeguarded sites, and meet targets
- Climate You Change said biogas should be used to power community kitchens
- 4 respondents recommended planning ahead for delivering broadband hubs, community help to access digital networks, and improved broadband infrastructure overall

Officer Response:

We welcome the support for updating the Joint East London Waste Plan, ensuring we safeguard enough sites across the east London sub-region to meet waste management needs (see Policy W1.2).

Recognising the challenges around delivering utilities infrastructure, Policy W4 emphasises the importance of frontloading these discussions early in the planning process, to better design-in and coordinate development growth and utilities delivery. The policies require effective dialogue with utilities providers, using recognised best practice guidance reference as part of the implementation section.

In relation to heat networks, the policy aims to support heat networks in areas identified by the London Plan, and to enable their delivery as part of sustainable growth. The London Plan Heat Map and manual are referenced as recognised guidance.

Q6. How can we plan for a utilities network which contributes to addressing the climate emergency?

- Thames Water said:
 - They are looking into new opportunities such as heat recovery, which the Local Plan should support in accordance with the NPPF and London Plan
 - The Local Plan should continue to assess the impacts of any development on Beckton Sewage Treatment Works in line with the agent of change principle set out in the NPPF and London Plan policy D13
 - Planning Officers need to work with Thames Water to ensure there is adequate water and waste water infrastructure to accommodate new developments
 - The requirements for land should be considered to meet the demand for the Plan period, which cannot solely be identified through Thames Water as they only plan for a 5-year period
 - Residents have said that specialist structural engineers need to be consulted, that services should be nationalised and there should be a Climate Change Tax, that collection systems need to be improved, that there needs to be more investment in renewables and green energy sources, that water treatment and rubbish removal should be improved, and that any change should be done at a London-wide scale
- 1 resident said they are not sure

Officer Response:

Officers acknowledge the comments in relation to waste collection services needing to be improved. While the Local Plan cannot influence the frequency of collections or taxation, the new policies introduced to improve waste management in new developments are discussed more fully in response to the question on other changes the Local Plan should consider (Q2).

The Utilities Policy requires applicants to effectively engage with utilities providers, including Thames Water, around infrastructure sufficiency, which would cover water and wastewater. Infrastructure Sufficiency Statements are required as part of major development applications.

Officers welcome comments raised in the consultation from key utilities providers and residents around environmental impacts such as smells and noise of utilities. A key tenet of the policy is to ensure that through design and layout, the spatial, visual and environmental impacts of utilities infrastructure is reduced. The Draft Local Plan Neighbourliness Policy D7 and London Plan Policy D13 would apply particularly around addressing the agent of change principles. New developments in close proximity to Beckton Sewage Treatment Works would also be required to submit an Odour Impact Assessment as part of any proposals.

Q7. Are there further mitigation measures in design terms to ensure utilities do not result in unacceptable impacts such as noise or smells?

- Fit for Walking recommends avoiding storing waste on streets and supporting the reduction of space for bins in developments, referencing the Create Streets document 'The Bin-Lorry Effect'
- Thames Water said odour impacts need to be assessed through an Odour Impact Assessment in consultation with Thames Water when considering sensitive development such as residential uses
- The Mayor of London recommends using the Best Available Techniques in terms of design and management of waste sites and urges more of a policy focus on de-risking growth and regeneration that minimises disruption through the use of the GLA's Infrastructure Mapping Application
- Developers said they support sustainable development and ensuring waste is reduced and managed sustainably
- Residents also recommend building large sewage pipes because they get blocked, as well as discouraging food waste, using innovative design and artificial intelligence, and applying regulations and enforcement action when needed to ensure places like Beckton and the Greenway do not have foul smells

Officer Response:

We acknowledge the comments provided with regard to waste. Local Plan Policy W3 seeks to encourage good quality waste management in new developments, both residential and non-residential, guided by the latest published guidance by the LBN Waste Management team. The Draft Local Plan Waste policies also encourage improved reductions in waste generation, as outlined in our support for circular economy principles in Policy W1. Policy W3.2, which requires a Waste Management Plan is submitted alongside major residential planning applications, seeks for new developments to be designed to allow sufficient storage for food waste collections. In addition to these requirements, Policy W2 covers the design of new or improved waste management facilities. Policy W2.3 encourages the use of best available techniques within these sites through the submission of a Management Plan outlining the layout and management of a facility to minimise amenity impacts.

See response to Q6 around managing environmental impacts.

Officers welcome comments raised around utilities delivery and impacts around disruption to existing communities, whilst also ensuring utilities infrastructure can be delivered to support growth and development in Newham. As a principle of Draft Local Plan Policy W4, all major developments must undertake early engagement with utilities providers. The policy approach actively aims to ensure applicants design-in and propose solutions to minimise the disruption caused by connecting to and delivering utilities, as well as ensuring there is future capacity to meet the demands of development. This includes sewer capacity and other policies which encourage more sustainable water management solutions. Added reference in the implementation section to the GLA's online Infrastructure Mapping Tool, aims to aid Applicants around capacity and conditions of existing utilities infrastructure. Proposals for major development will be required to submit an Infrastructure Sufficiency Statement demonstrating the dialogue with utilities providers has occurred and that there is sufficient utilities infrastructure capacity to support new demand. Where insufficient capacity is identified and where further work is required conditions will be used to secure upgrades or further studies where required.

Other themes:

- LBN Adults and Health voiced difficulty in understanding technical aspects of policy
- LBN Public Health would like to see food waste covered in the policy
- Thames Water would like to see more on water within the policy

Officer Response:

We acknowledge that waste management can be a technical subject, in terms of the different waste streams and management facilities. Policy W3 encourages early engagement on the design of waste storage facilities with LBN's Waste and Recycling team, to ensure the design of new developments helps support waste reduction and recycling. Designing developments to allow for future food waste storage and collections is discussed in response to Q2.

Issues around water infrastructure capacity and management in light of the climate emergency and anticipated growth are recognised. By definition, the principles in Draft Policy W4 around infrastructure sufficiency, managing impacts and ensuring infrastructure is aligned, are applicable to water. This also includes reference to and dialogue with Thames Water for all major development proposals. The policy also encourages new and expanded water infrastructure to support growth needs, including on industrial designations as set out in the Draft Economy Policies J1 and J2. Policy CE8 aims to mitigate the impacts of climate change on heavily urbanised places like Newham, through designing-in better sustainable water management solutions to minimise the amount of rainfall entering the sewers.

There were no workshops for this theme.

Q1. Do you agree with the proposed changes?

- 23 comments from residents, LBN Public Health, LB Waltham Forest, Monega Association, and LB Redbridge agree with the proposed changes, specifically making the plan more accessible, making it available in various languages, and using digital tools and mapping.
- 3 residents do not support the proposals, one of which would prefer to just refine the current plan.
- Port of London Authority supports making use of digital tools and maps, and emphasises the importance on being clear on safeguarded wharves' boundaries, radar sight lines, and SIL boundaries.
- University College London agrees with using more digital tools such as a Policies Map and having public involvement in the Plan production.
- LBN Public Health would like to provide support with the Health Impact Assessment and the Characterisation Study, particularly in capturing health inequalities.

Officer Response:

Officers acknowledge the 65 comments received and are encouraged by the predominately-positive feedback. We are committed to making an online digital map available for adoption of the Plan and hope to be able to provide one at the regulation 18 and 19 consultations too. We are using additional digital methods to consult on the Plan, including using software which allows comments to be made directly on passages of the Local Plan.

The suggestion of the final Local Plan being made available in various languages is supported but due to the costs of producing these, this will be by request only.

Public Health colleagues' support and input is much welcomed and we have used their expertise to develop the policies and Health Impact Assessment approach.

Q2. Are there other changes we should consider?

- 3 residents think there is nothing else to be considered, and 2 residents said that they do not consider anything else should be added but that it is key that the plan is implemented.
- 3 residents said that the plan needs to be more accessible, shorter, less text-heavy, and more digitally-interactive.
- 1 resident said that more consultation and engagement is necessary.
- London City Airport said the new Plan should refine the existing Plan while focusing on economic recovery and climate change.
- Developers argue that the new Plan should be flexible in light of the current economic uncertainty.
- The NHS Urban Development Unit recommends embedding engagement and co-design in the Statement of Community Involvement and in the Health Impact Assessment, which they also recommended to make a requirement for large proposals.
- LB Waltham Forest advises that Natural England and the City of London should be thoroughly consulted in relation to Epping Forest SAC and the Lea Valley Regional Park.

Officer Response:

Officers note support for further consultation as well as the need to embed engagement and co-design in the Plan's delivery. Two further consultations are being held on the Draft Local Plan and we have a range of activities planned to ensure we receive input from a range of stakeholders. This will include detailed engagement with key stakeholders on Epping Forest SAC and the Lea Valley Regional Park. We are also including policy requirements on co-production to ensure that residents are involved in the delivery of the Local Plan, once it is adopted.

The spatial strategy and policies in the Draft Local Plan have been positively prepared to respond to the significant changes which have occurred in the economy, to trends and ways of living and working, as well as to respond to key Newham objectives adopted since 2018. Where policy approaches in the current Local Plan still deliver these outcomes, they remain, but changes have been made to respond to new challenges, so as to remain up-to-date and effective: as required by the National Planning Policy Framework. The policies are evidence-led and provide a strong framework to ensure development meets Newham's needs, while meeting the requirements of paragraph 82 in the National Planning Policy Framework.

A response regarding the accessibility of the Plan is provided under Q4.

Q3. Is there anything missing?

- 4 residents said nothing is missing.

Officer Response:

This response is noted.

Q4. Are there any planning documents you consider to be particularly easy to use?

- 4 residents said they had no good examples to share, particularly because all plans are too wordy and complex.
- LB Waltham Forest said that the introductory section of the Issues & Options document is very accessible, and the infographics are useful to contextualise the borough.
- Monega Association welcomes any simplification of the Plan.
- 1 resident said that that good examples need to be researched.
- 1 resident suggested that the Altering and Extending Your Home SPD is a good example of a planning document.

Officer Response:

We recognise that planning documents can be complex and wordy and have tried to ensure the use of plain English, shorter policies and sentences and clearer explanations of what the policies are seeking to achieve. We welcome the comments that the Issues and Options document is accessible and will look to

continue this approach. It is important to note that there are limits to how simplified the document can be due to the technical topics it has to give guidance on to be effective.

The Draft Local Plan emphasises the importance of local neighbourhoods and each Neighbourhood policy provides a summary of the key proposals and policies that impact that area. We hope this will provide a quicker and more accessible way for residents interested in particular parts of the borough to understand what is being proposed.

Other themes:

- 4 residents said that the main priority is to actually deliver the plan.
- LB Redbridge and LB Waltham Forest welcome that LBN is fulfilling its Duty to Cooperate requirements.
- Lea Valley Regional Park Authority welcomes discussions to plan for the Park during the plan-making period.
- 1 resident warns of digitally-excluding residents if the plan moves entirely into a digital format.

Officer Response:

Officers recognise and support residents' priority to see the Plan being delivered. One of the crucial tests for the Local Plan is that it is deliverable and the range of evidence base documents which support the Plan, provide further detail to demonstrate this. We also work closely with colleagues across the Council, as well as partner organisations such as the Mayor of London and Transport for London, to ensure that key parts of the Plan come forward as anticipated.

Hard copies of the Local Plan, at all stages of its development and after adoption, will still be available, including in our libraries.

We welcome the acknowledgment that the Duty to Cooperate requirements have been fulfilled and look forward to working with neighbouring boroughs and planning authorities over the development of the Plan and on key joint projects.

There were no workshops for this theme.

Q1. You can use this section to provide any general comments on our proposals.

- There were 29 comments mentioning the Local Plan on the following subtopics:
 - Praise – the consultation is passionately engaging with residents, bringing motivation, producing a comprehensive and thoughtful document, and welcoming the opportunity for residents to share their opinion in what will become a good city Plan (residents, developers, University of East London, Stephen Timms MP, LB Waltham Forest, and Canal & River Trust)
 - Critique – there is too much prose and pictures would be better, the Plan needs to learn from previous poor planning decisions, with more diligence in terms of design, and with the need to be more critical with developers
 - Language – the Plan needs to have simpler language because the information is hard to read, with some proposed changes phrased in a difficult way to understand (residents and LBN Adults and Health)
 - Document – need to check the veracity of statistics provided in the Plan, as well as better proofreading because the page numbering is incorrect, and the document needs to clearly show how residents can get involved
 - Involvement – the questionnaire was too long, yet residents, the Environment Agency, the Marine Management Organisation, the Home Builders Federation, and Friends of West Ham showed interest in wanting to get involved in the review process to support the delivery of the Plan
 - Priorities – need to balance competing priorities (affordable housing, protection of community assets, climate emergency, and resident participation), need to acknowledge different needs according to each neighbourhood, and need to listen and represent the community (residents and Newham Councillors)
- There were 53 responses regarding engagement activities partaken during the Issues & Options consultation, which mentioned:
 - Praise – best and fullest consultation in last thirty years with overall great ideas, increased levels of community participation (Canal & River Trust), and with a lively approach from the Council
 - Improvement – links in Co-Create need to be more visible and accessible, residents need to be better informed to remove barriers to participation (Royal Docks Engagement team), residents need to receive feedback (Friends of Queens Market), the questionnaire was hugely time-consuming, December was a poor choice of month to consult, need more visuals and more detail, need for resident participation to be genuine
- 6 responses mentioned the importance of having a sense of community
 - Need more involvement from different communities
 - Need to instil a sense of pride and showcase cultural diversity
 - Need to give hope to residents and make them feel like they are part of the community

Officer Response:

Officers acknowledge the 136 general comments received. We are encouraged by the feedback that has praised the refresh process as comprehensive and acknowledge that there are areas for improvement to simplify the consultation process and make the documents easier to read and understand. We also welcome the interest from relevant stakeholders in participating throughout the continuation of the refresh process.

The next round of consultation will address the issues raised with regard to engagement methods. The questionnaire will be altered so it is shorter and easier to answer, and a range of consultation methods will

be used to ensure everyone is informed about the consultation taking place. Due to the timeframes of the Local Plan Refresh process, consultation is due to take place in winter again, however, plenty of online methods are available in case of bad weather. The Draft Local Plan seeks to be interactive, including more maps and graphics to help communicate the policies and make them easier to read. The policies in the Draft Local Plan will undergo scrutiny by Council members and the Planning Inspectorate to ensure that everything in the Plan is factual and deliverable.

We recognise that we need to balance competing priorities within the Plan, understanding the context-specific needs of different parts of the borough, and listening to residents. We have also taken on board the importance that residents have placed in having a sense of community and instilling local pride.

The Draft Local Plan seeks to address the gaps in policy that have led to poor outcomes in the past, and it is seeking to be as innovative and beneficial for residents as possible. The Plan identifies priorities through the evidence base undertaken as well as through listening to, and applying, resident feedback. The Characterisation Study has identified different priorities for different parts of the borough and this has been used to develop sixteen Neighbourhood policies in the Draft Local Plan, replacing the current five spatial policies. Through policy-making, we are seeking to meet the diverse needs of Newham residents, and through engagement, we are focusing on a range of methods that ensure that the diversity of Newham is being engaged with, helping to foster a sense of community by working together with local community members.

Q2. Please provide any final comments.

- Need to support families
- Need developments to comply with local and national planning policy
- Need more funding from developers
- The Metropolitan Police said that s106 funding should be invested in policing infrastructure because the growth in housing will likely result in the need for additional policing
- Regeneration has not disrupted the post-war planning model
- Developments should bring about local employment and the Council needs to do more to achieve this
- Place-making is applicable to Urban Newham, not just the Royal Docks and LLDC
- Young people need access to culture and nature, as well as opportunities
- The Royal Docks team and the Mayor of London said that the OAPF and the Local Plan need to reinforce each other and that both institutions need to work closely together
- Major applications from not-for-profit organisations should be favoured, developments should carry out Health Impacts Assessments, and developers should pay for CIL
- LB Waltham Forest is committed to support LB Newham in its aspirations under Duty to Cooperate
- The Marine Management Organisation said that the Local Plan may wish to reference the MMO's licensing requirements and should reference the South East Marine Plan
- The Coal Authority has no comments to make about the Local Plan
- University College London expressed interest in planning developments, especially considering the LLDC's transferring of planning powers
- Friends of West Ham Park want to set up a meeting with LB Newham and City of London
- The Canal & River Trust consider the consultation document to be too broad, with not much specific detail at this stage

Officer Response:

Officers acknowledge the 103 general comments received. It is recognised from the feedback that LB Newham needs to better support families and provide better access to culture and employment for young people. The Council is addressing the essential role of young people within the community and has developed a Young People's Charter, which was co-produced with young residents, and which will inform the upcoming Children & Young People's Plan 2022-2027. This Plan will improve the strategic direction for the delivery of Council services for children, young people, and families. The Planning Policy team understand the enormous value and need for planning for young people and families, which is why they are placed at the core of our Local Plan vision to build a fairer Newham, and are key audiences for our consultation activities.

Officers greet the various comments made about the practices that should take place when assessing and approving developments, including but not limited to: complying with national and regional policy, receiving higher contributions from developers, promoting local employment, favouring applications from the not-for-profit sector, and carrying out Health Impact Assessments. The Local Plan integrates local, regional, and national policies to ensure that developments are always compliant. In the Draft Local Plan, we are proposing higher contributions from developers, as well as a more robust assessment of applications that will include Health Impact Assessments more commonly. Our proposed Economy policies seek to bring about more local employment opportunities, and although we cannot favour one Applicant over the other,

we are committed to supporting local not-for-profit organisations with their planning applications via our Duty Planning Service.

Lastly, the Planning Policy team gratefully acknowledges all of the official representations provided by statutory consultees, such as the Marine Management Organisation and the Coal Authority. It also appreciates the commitment of the GLA, Royal Docks team, LB Redbridge, and LB Waltham Forest to Duty to Cooperate. Finally, comments from large-scale organisations that play an important role within the borough are also welcomed, including University College London and the Metropolitan Police. We are continuing to consult statutory consultees and other stakeholders during Regulation 18, and we are maintaining a close relationship with our surrounding Local Authorities to work together toward better futures, as with the upcoming neighbouring Local Plans and the Royal Docks OAPF.

There were no workshops for this theme.

5.15 Responses on Non-Planning Matters

There were overall 175 responses received that related to non-planning matters that cannot be addressed through the Local Plan. We consider such comments nonetheless valuable for LB Newham, as they represent residents' opinions. As such, we analysed those comments and sent them to the relevant Council teams, including Housing, Regeneration, Public Health, Waste, Education, Highways, and Youth Services.

Appendix

1. Public Notice



Newham Local Plan Refresh – Notice of Engagement

The London Borough of Newham is refreshing the Newham Local Plan 2018 so we can plan for the next 15 years and respond to our key challenges of delivering inclusive growth, supporting the Covid-19 recovery, and addressing our climate emergency. The Local Plan is the key planning document which the Council uses to assess planning applications and to manage where regeneration and development happens in Newham, what it is used for and what it looks like.

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

The Issues and Options document (Regulation 18 stage) and accompanying Integrated Impact Assessment Scoping Report have been published in order for comments to be made prior to the drafting of the new Local Plan. Consultation for the Statement of Community Involvement is also taking place during the same period.

Comments can be submitted during this Regulation 18 engagement period between **18th October 2021 and 17th December 2021**.

Visit newhamco-create.co.uk/newham-local-plan-refresh to find out more about the Newham Local Plan Refresh, to find details of the consultation events and to submit comments via a questionnaire, video and photo submissions. Comments can also be sent by email to localplan@newham.gov.uk. Paper copies of the Issues and Options document can be found at Newham libraries during normal opening hours.

If you want to be kept updated on the Local Plan Refresh, sign up to the Local Plan mailing list via www.newham.gov.uk/localplan or email localplan@newham.gov.uk for any additional queries.

3. List of themed workshops' attendees

High Streets	• Stratford Original BID • Manor Park Business Association • Woodgrange Market • LBN Regeneration • East Ham & Manor Park Architect • Arbery Properties • Members of the Newham High Streets Group • Member of Design Review Panel
Design	• Newham Unlocked Organiser • Local Residents • Members of Design Review Panel • LBN Strategic Design Manager • LBN Head of Design, Housing Delivery team
Transport	• Newham Cyclists • Better Streets for Newham • Fossil Free Newham • London City Airport • Road Haulage Association
Green Infrastructure & Climate Emergency	• Better Streets for Newham • Aldersbrook Residents' Association • Climate You Change • Hermit Park Friends • Abbey Gardens • Plastic Free Royal Docks • Shpresa Programme • Friends of West Ham Park
Economy	• ACME Studio • SEGRO • Newham College • East London Business Alliance • It's Like This Studio • Deloitte
Community Facilities	• LBN Education team • Royal Docks Welfare Association • East London Cricket • Local Residents • NHS North East London CCG • East London NHS Foundation Trust • Newham Interfaith Group • Area Dean of Newham • St Paul's Church of England • Newham United Dialogue • Aston-Mansfield
Housing	• Newham Homelessness Action Group

	• Residents' Steering Group (Canning Town, Custom House, Carpenters' Arms Estate) • East London NHS Foundation Trust • Occupational Therapy Practice team • Populo Living • Newham Parent Forum
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4. List of representors (excluding residents)

Statutory Consultees	• Canal & River Trust • Environment Agency • Highways England • Historic England • LB Redbridge • LB Waltham Forest • Lea Valley Regional Park Authority • London City Airport • Marine Management Organisation • Mayor of London • Metropolitan Police Service • National Grid • Natural England • Network Rail • NHS Urban Development Unit • Port of London Authority • Sport England • Thames Water • The Coal Authority • Transport for London • Woodland Trust
Community Groups' Representatives	• Action for Swifts • Bow Creek Moorings • CAMRA • Climate You Change • Fit for Walking • Fossil Free Newham • Friends of Queen's Market • Friends of West Ham Park • Hackney Swifts • London Green Spaces Network • Monega Residents' Associations • Newham Cyclists • One Newham • River Roding Trust • Royal Docks Community Voices • Shpresa Programme • Swifts Planning • Urban Development Music Foundation
Developers/Landowners	• Get Living Plc • Barratt London • Unite • Newham Sixth Form College • Valor • University College London

	• DP9 on behalf of The Silvertown Partnership • Iceni of behalf of Beckton Alps Real Estate Development Ltd • Home Builders Federation • St William • Ballymore • IXO • Berkeley Homes • SEGRO • Royal Docks • International Quarter London • Abridn
Elected Officials	• Former Councillor Daniel Blaney • Councillor John Whitworth – West Ham • Councillor Sasha Das Gupta – Forest Gate North • Councillor Anamul Islam – Forest Gate South • Councillor Belgica Gueña – Canning Town South • Stephen Timms MP – East Ham
Council Staff	• LBN Adults & Health • LBN Public Health • Royal Docks Engagement team