

Green and Water Spaces Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/021	Green and Water Spaces	GWS1 Green spaces						While Anchor is generally supportive of a policy which seeks to deliver easy access to a network of high-quality green spaces, we are concerned about the definition of open space provided at GWS1.1 which is not positively prepared, justified or effective and is not consistent with national policy. The definition describes open spaces as spaces that are in public or private ownership, can have unrestricted access, partially restricted access or restricted access and includes all open areas whether or not they are accessible to the public. That definition of open space is not consistent with the NPPF which requires the spaces to be of “public value” and offer important opportunities for “sport and recreation”. The definition as currently proposed would encompass all privately-owned and inaccessible spaces with the exception of private gardens, regardless of their value or use. Combined with Criteria 1a and 2 of GWS1, which protects existing open space from net loss except in exceptional circumstances, this will significantly limit the development potential of otherwise policy-compliant sites in Newham by overstating their value. The policy is therefore not justified or effective.	This policy approach has now changed due to the need to ensure our definition of green space we provide is clear and aligns with both the London Plan and NPPF. Please note that the adopted definition of Open Space in the London Plan is: Open space: All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted. Please see the new wording in the implementation text to support Policy GWS1.

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	A change to this policy approach has not been made. We did not consider this change to be appropriate as the need for accessible green space in Newham is so great that it is imperative we secure such space on sites which are of the scale that they are referable to the Mayor of London. The need for additional publicly accessible green space is clearly demonstrated in Newham's Green and Water Infrastructure Strategy (2024).	We also consider that flexibility should be introduced to Criteria 3 to ensure that a requirement to provide on-site publicly accessible open space does not compromise the viability of development, particularly in areas that may be considered to be deficient in open space but are located adjacent to significant areas of open space in other boroughs. This will ensure that the policy is effective.		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-050/022	Anchor	Reg18-E-050

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		6. Developments which include affordable housing should ensure: a. affordable housing is of an equivalent quality to private accommodation in terms of its location, orientation, proportion, external appearance, communal entrances and amenity areas; Unnecessary Repetition. Part 1 refers to All Housing development, which should therefore include affordable housing. Paragraph 16E of the NPPF seeks to avoid unnecessary duplication.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-070/082	Aston Mansfield	Reg18-E-070

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	Support noted.	1. Development should provide or help to deliver easy access to a network of high-quality green spaces. This will be achieved through: Support the broad principle of delivering easy access to a network of high-quality green space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-070/086	Aston Mansfield	Reg18-E-070

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	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 seeks to protect green space it also provides exceptions where loss is deemed to be acceptable. This is considered to be proportionate and balanced approach. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to						GWS1 Green spaces	Green and Water Spaces	Reg18-E-070/087	Aston Mansfield	Reg18-E-070

Comment Response	deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Reg18-E-070	Aston Mansfield	Reg18-E-070/088	Green and Water Spaces	GWS1 Green spaces						<i>b. maintaining the open character of Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy; and</i> Object – Full review of MOL has not yet been undertaken, this aspect of the plan has not yet been positively prepared	This policy approach has now changed due to evidence from the desktop review of Newham’s MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham’s strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham’s MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.
Reg18-E-070	Aston Mansfield	Reg18-E-070/089	Green and Water Spaces	GWS1 Green spaces						<i>c. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing open space; and</i> Support opportunity to improve functionality,	Support noted.

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		connectivity, quality and accessibility of open space.									
		<i>d. ensuring development next to green space does not negatively impact its functionality, quality and accessibility; and</i> Support recognition that development should respond positively to open space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-070/090	Aston Mansfield	Reg18-E-070
		<i>e. maximising opportunities to deliver new and improved open space (including playing pitches and ancillary sporting facilities), with particular focus on the locations in table 14 which will experience the highest level of need over the plan period; and</i> Support opportunity to deliver improved open space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-070/091	Aston Mansfield	Reg18-E-070

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Reg18-E-070	Aston Mansfield	Reg18-E-070/092	Green and Water Spaces	GWS1 Green spaces						<i>f. requiring all development to consider from the outset the form, function, and extent of green infrastructure opportunities, to maximise urban greening and improvements to Newham's network of green links as part of schemes; and</i> Support recognition to consider green infrastructure and improvements to green links from the outset.	Support noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/093	Green and Water Spaces	GWS1 Green spaces						<i>2. Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances where</i> Object – Without review of MOL boundaries policy should not rule out development upon existing MOL.	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please

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	see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.										
	Support noted.	Ballymore supports the Council's ambition to deliver easy access to a network of high-quality green spaces for all residents.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-077/040	Ballymore Group	Reg18-E-077

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	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.	However, we do have concerns regarding Part 5 of draft policy which requires all new open space which will function as a local park to be transferred into the Council's ownership together with a commuted sum to cover the cost of maintenance over a 15 year period. Ballymore usually stay on as the freeholder and estate manager for all their sites, as we find that retaining control of the open space allows for the same high quality maintenance of landscaping across all areas of public realm. Retaining ownership is particularly important because of the need for the developers estate management team to provide 24/7 security on site to address anti-social behaviour and crime. We therefore suggest that the policy shouldn't set out an outright requirement for open space transferred to the Council, but instead offer two options: either the open space is transferred into the Council's ownership or the space can remain in private ownership, as long as it continues to function as a local park in accordance with the principles set out in the Public London Charter (with no clear preference over either option).		5			GWS1 Green spaces	Green and Water Spaces	Reg18-E-077/041	Ballymore Group	Reg18-E-077

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	Comment noted.	Draft Policy GWS1 (Greenspaces) of the Regulation 18 Local Plan emphasises that development should provide easy access to a network of high-quality green spaces by protecting existing open space to ensure there is no net loss and maximises opportunities for improving functionality, connectivity, quality and accessibility to open green space					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/016	Beckton Alp Real Estate Ltd	Reg18-E-099
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to	It is also noted that within the consultation draft, Beckton Alp is allocated as both an area of Open Space and a Site of Nature Conservation Value (SINC). However, it is not believed that these designations can be strictly applied to the Site for the following reasons:					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/017	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response	approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.								
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	not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted.	This would also mean that the Site could connect into Newham's wider green network by opening up the connections to the Newham Greenway just to the north of the site					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/022	Beckton Alp Real Estate Ltd	Reg18-E-099

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Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/024	Green and Water Spaces	GWS1 Green spaces						Poor Functionality of the Open Space It is considered that the Site does not provide any public amenity value or function as an open space for multiple reasons. These include: • Safety measures implemented to protect the public from the hazardous waste and contaminated land on Site. • Vastly overgrown greenery and general poor state of repair. • Security instability which attracts anti-social forms of behaviour. • Existing sloping topography is likely to mean that this area of the site will always be of limited public benefit in its current form.	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would

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Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/026	Green and Water Spaces	GWS1 Green spaces						It is, however, important to note that these benefits could only be viably delivered to the Open Space as part of the wider redevelopment of the Site as an industrial-led scheme.	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would

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	Comment noted.	SINC Designation As part of the evidence base for the Newham Local Plan Regulation 18 Consultation Draft, a review of the SINC Designations was prepared by London Wildlife Trust. This indicates that there is no material change in the SINC designation since last review and the Site remains as a Borough-Level SINC. The review also highlights the importance of the Site as a location for some rare plants such as					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/027	Beckton Alp Real Estate Ltd	Reg18-E-099

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		Goat Willow as well as potential for the existing areas of grassland to remain and provide a good habitat for a range of uncommon plants and invertebrate.									
	Comment noted.	Loss of Open Space Notwithstanding the demonstration of the poor-quality open space and the retention of the least ecologically sensitive parts of the site as publicly accessible open space, draft policy GWS1 also states that the loss of open space would be supported in exceptional circumstances where: a) it will not create or increase open space deficiency (at any scale). b) the development will deliver local scale facilities which improve the usability and enjoyment of an open space by: i. delivering a high standard of design which complements the character and appearance of the open space. ii. improving the function of the open space while not having a negative impact on wildlife and biodiversity. iii. being designed for people of all ages and physical abilities.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/034	Beckton Alp Real Estate Ltd	Reg18-E-099

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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	With regard to point a), by virtue of the Site not being publicly accessible, the proposals would be providing circa 6 acres of public open space combined with industrial uses in this part of the Borough.		1a			GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/035	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response		not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	Notwithstanding this, the Site is located in Beckton, which the Newham Green and Water Space Strategy (2022) identified as being relatively well-endowed with publicly accessible green space. The redevelopment will therefore not increase open space deficiency but improve the current levels of access.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/036	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response		not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	Point b i. and iii. would also be addressed within future design details but it is considered that removing the current barriers to access and remediating the land will improve the appearance of the Site as well as allow access for people of all ages and physical abilities.		1bi and GWS1 :1...iii			GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/037	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response		not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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							GWS1 Green spaces	Green and Water Spaces	Reg18-E-099/038	Beckton Alp Real Estate Ltd	

Comment Response		not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/039	Green and Water Spaces	GWS1 Green spaces						It is therefore considered that the proposed redevelopment of the Site does not conflict with draft Policy GWS1 and would deliver a number of benefits to the Open Space, which would not be possible if the Site were to be left in its current form.	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 specifically addresses green space. However, we have made a change to Policy GWS2 to better address the need to improve connectivity to water spaces. Please see the new wording at Policy GWS2.	GWS1: Green spaces We are pleased to note a requirement for improving connectivity to green space for both habitat and people, which we would like to see include connections to the waterway corridor.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-143/010	Canal and River Trust	Reg18-E-143

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.									City of London	Reg18-E-148

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	City of London are keen to ensure that any redevelopment of the [West Ham Park Nursery] Site takes a coordinated, design-led approach to placemaking which places people at the heart of the design and delivers for the local community.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-148/011	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	The City of London supports the need as outlined in Draft Policy GWS1 (Green Spaces) to protect existing open spaces within the Borough and in particular, a requirement to maximise opportunities for improving the functionality, connectivity, quality and accessibility of existing open space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-148/027	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	City of London welcomes the need for new publicly accessible open space to, inter alia, deliver welcoming spaces, be codesigned in consultation with local people, maximise biodiversity and be designed to be enjoyed by people of all ages and physical abilities. We also acknowledge the need to ensure that development next to open space does not negatively impact its functionality, quality and accessibility.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-148/028	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	City of London is currently exploring opportunities to open-up part of the [West Ham Park Nursery] Site as new green space, which in effect would form part of West Ham Park, thereby providing new open space and new connections into the park. We consider that this would help contribute to the requirements of Draft Policy GWS1.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-148/029	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.	We note that Draft Policy GWS1 states that “it is expected that new open space on site allocations or space which will function as a local park will to be transferred into the Council's ownership” . Whilst City of London appreciate that in some circumstances this may be appropriate, City of London would seek to retain ownership of the Site and any new open space delivered,					GWS1 Green spaces	Green and Water Spaces	Reg18-E-148/030	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		as part of its wider asset portfolio, which includes West Ham Park.									
		P.208 GWS1 Green spaces – Table 14: Open Space Deficiency – Community growing space – Comment: Boleyn ward is not listed as one of your Under-provided Wards (pre-2022) within the category of Community growing space.		Table 14			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/021	Climate You Change	Reg18-E-133
		[Boleyn ward - lack of community growing space] We would like to raise this as an issue, as to our knowledge there is not yet a functioning community garden or allotments within this ward.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/022	Climate You Change	Reg18-E-133
		Comment noted. The Green and Water Infrastructure Strategy (2024) has been completed since the Regulation 18 Local Plan consultation. It does indeed indicate that there are no allotments in the Boleyn Ward. Since there are no site allocations in the East Ham South N12 neighbourhood the Local Plan is unable to stipulate the delivery of community growing space in Boleyn Ward. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of community growing space outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.										
	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Priory Park] The issue around crushed concrete on the pathway around the raised beds in Priory Park has meant that this area (behind the basketball courts) has not been finished. There is yet to be a finished, operable community garden in the space					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/023	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Priory Park] Fruit bushes and community chosen fruit trees also weren't delivered as per the 2021/22 Community Assembly project voted on by the public.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/024	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Priory Park] We weren't given permission via working group membership of Green Street Ward to put a project in (further to insufficient public projects) for a food forest in Priory Park. The feedback from Parks was that there had been a lot of investment in Priory Park in 2021/22.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/025	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	[Priory Park] Boleyn Ward is a ward which has a very small area of green space in Priory Park against other wards. It sits close to other parks at its outer edges but contains very little suitable space for food growing, making a food forest in Priory Park all the more valuable.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/026	Climate You Change	Reg18-E-133
	Comment noted.	At Climate You Change we have enjoyed a really good relationship with the Council and have been involved in a number of projects. We value this relationship and wish for it to continue and grow. So, we have no desire to muddy the waters over Priory Park.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/027	Climate You Change	Reg18-E-133
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024). Please see the new wording in Policy GWS1 which has removed the table of open space deficiency. Policy GWS1 now guides the reader to Newham's Green and Water Infrastructure Strategy (2024) which provides further detail on the location which will experience the highest level of need, with regard to green space, over the Local Plan period.	. It is however worth mentioning that Boleyn Ward should be listed in Table 14: Open Space Deficiency alongside Community growing space as one of the 'Under-provided Wards (pre-2022'.		Table 14			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/028	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary because whilst clause GWS1.3d (formerly GWS1.2d) states that development that will deliver local scale facilities which improve the usability and enjoyment of green space is acceptable, it is only permitted if certain criteria are met. Importantly, clause GWS3.d.ii requires any such development to improve the function of the green space while not having a negative impact on wildlife and biodiversity.	P.209 2. 'Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances where: a. it will not create or increase open space deficiency (at any scale); and 3 b. replacement open space is provided in Newham, which provides equivalent or better functionality, quality, and quantity...or d. the development will deliver local scale facilities which improve the usability and enjoyment of an open space' Comment: This concerns us because despite a number of measures included in the plan to protect biodiversity in respect of developments on open space we are concerned by the loss of green space in and of itself.		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/029	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be necessary because whilst clause GWS1.3d (formerly GWS1.2d) states that development that will deliver local scale facilities which improve the usability and enjoyment of green space is acceptable, it is only permitted if certain criteria are met. Importantly, clause GWS3.d.ii requires any such development to improve the function of the green space while not having a negative impact on wildlife and biodiversity.	Where new developments are built on existing covered surfaces and areas of hard standing, we can see that there is no loss to carbon drawdown potential, in-ground food growing possibilities, in-ground plants for pollinators/beneficial insects, protection of soil health, plus existing eco-systems and flood mitigation.		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/030	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	At Climate You Change we understand that you as a Council have a huge range of needs which you must meet and that these must be balanced against one another. However, we would ask that there is considerable consideration giving to how green areas of uncovered land can be maintained and protected.		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/031	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	Loosing green spaces, irrespective of how enjoyable replacement spaces are can only contribute to the rapidly intensifying danger of climate change. It also will make our communities much more vulnerable to climate weather extremes		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/032	Climate You Change	Reg18-E-133

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	So, we urge you to protect our green spaces at all cost, avoiding any reduction in the land available as uncovered green spaces.		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/033	Climate You Change	Reg18-E-133

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/034	Green and Water Spaces	GWS1 Green spaces			4			P.209 4. 'Where a development is providing publicly accessible open space, it should: b. be co-designed in consultation with local people' Comment: Could residents be asked to work within certain parameters during this process? We suggest that local people are asked to work with suggestions that don't result in any green areas being covered and even significantly limit permeable ground cover.	A change to this policy approach has not been made. We did not consider this change to be necessary because Policy GWS1 sets out, in clause 4, the need for publicly accessible green space to be co-designed in consultation with local people, early on in the preparation development of an application. This is further expanded on in the implementation text GWS1.4. It is not considered necessary to specify further detailed parameters for co-design in this policy as Policy GWS1 already seeks to protect green space and the implementation text includes a preference for permeable surfaces.
Reg18-E-133	Climate You Change	Reg18-E-133/035	Green and Water Spaces	GWS1 Green spaces			4			We understand that residents have different needs and wants...including basketball courts, skate parks and other sports areas using ground coverings	Support noted.
Reg18-E-133	Climate You Change	Reg18-E-133/036	Green and Water Spaces	GWS1 Green spaces			4			However, given the immeasurable need for climate change mitigatory practice and the lack of engagement in prioritising something so essential to future community safety, happiness, health, wealth etc. then we ask that you, the Council prioritise this [climate change/not covering green surfaces] need for the people.	A change to this policy approach has not been made. We did not consider this change to be necessary because Policy GWS1 sets out, in clause 4, the need for publicly accessible green space to be co-designed in consultation with local people, early on in the preparation development of an application. #This is further expanded on in the implementation text GWS1.4. It is not considered necessary to specify further detailed parameters for co-design in this policy as Policy GWS1 already seeks to protect green space and the implementation

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	text includes a preference for permeable surfaces.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1.4 requires applications for new publicly accessible green space to be co-designed in consultation with local people, early on in the preparation development t of an application, to bring local views and voices into the development of the space	We ask that you accommodate residents needs within the framework of playing our part within Newham in safeguarding everyone’s future safety		4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/037	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1.4 requires applications for new publicly accessible green space to be co-designed in consultation with local people, early on in the preparation development t of an application, to bring local views and voices into the development of the space	So, with public co-designing of green spaces we strongly suggest that the resident consultation is framed within certain criteria which we ask if it can be factored into the wider plan:		4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/038	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS1, requires the integration of food growing opportunities where feasible and practical.	[food growing initiatives (to reduce food miles)		4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/039	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS1, requires the integration of food growing opportunities where feasible and practical.	education about food growing, to also encourage more food growing in private gardens, to lower food miles and teach about seasonal eating as part of the growing and harvesting process		4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/040	Climate You Change	Reg18-E-133
	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.	the planting of food forests [*Explanation and diagram of a food forest, plus a good resource for lots of information: https://www.crcresearch.org/crc-blog/seven-layers-food-forest https://www.agroforestry.co.uk , to have a really positive impact on carbon drawdown, lowering food miles, teaching greater respect for the natural World and why we must save it, alongside help for biodiversity (including pollinators and beneficial insects)	NP CHECK rep next stage	4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/041	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be necessary because the implementation text to clause GWS1.4 states that where green public open space is not possible, development should maximise urban greening features such as planting and permeable paving. In addition, it states that development should maximise sustainability benefits, including the use of permeable surfaces.	sports and fun, active spaces which don't involve solid, impermeable surface coverings and only use minimal permeable surfaces (ideally kept to a minimum)	NP CHECK rep next stage	4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/042	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through Policy GWS5. However, it cannot deliver the change you have requested. Our colleagues	the reparation and improvement of existing equipment (play, benches etc.) before ever considering new equipment.	NP CHECK rep next stage	4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/043	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/044	Green and Water Spaces	GWS1 Green spaces			4			the use of infrastructure made of recycled materials wherever possible when new equipment is required, i.e., recycled plastic benches, tables and play equipment.	A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation text to Policy GWS1.4 already sets out that applications for new green space should maximise sustainability benefits, including the use of sustainable materials.
Reg18-E-133	Climate You Change	Reg18-E-133/045	Green and Water Spaces	GWS1 Green spaces			4		NP CHECK rep next stage	encouraging residents to value and see the true worth of what they already have within their green spaces, to want to protect and preserve before considering that there need be new infrastructure unless it is augmenting the natural and food growing elements already present	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/046	Green and Water Spaces	GWS1 Green spaces					GWS1.1	P.211 Implementation GWS1.1 'Over the Plan period we will: • maintain 0.047 hectares per 1,000 residents of allotment and community garden space.' Comment: We are very keen to request that Newham Council include a commitment in the Local Plan to provide a community garden/allotment in every park, including composting, leaf mulch, leaf mould facilities and bug hotels.	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/047	Green and Water Spaces	GWS1 Green spaces					GWS1.1	We ask that the same provision is a made in every green space, big and small, subject to necessary considerations (safety, access, underground services,	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										pollution/contamination, amount of space etc.) C	
Reg18-E-133	Climate You Change	Reg18-E-133/048	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Can permission be sought for the same in the Olympic and West Ham Park?	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/049	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Could there be a commitment to provide rainwater harvesting where infrastructurally possible in community gardens (or at least to give permission for installation)?	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/050	Green and Water Spaces	GWS1 Green spaces					GWS1.1	We suggest the Council include information within the Local Plan, detailing how they can engage with local residents to set up as many community food growing spaces as possible.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1.4 requires applications for new publicly accessible green space to be co-designed in consultation with local people, early on in the preparation development t of an application, to bring local views and voices into the development of the space
Reg18-E-133	Climate You Change	Reg18-E-133/051	Green and Water Spaces	GWS1 Green spaces					GWS1.1	We suggest sustainable materials (shou sugi ban treated FSC wood & heat-treated pallets).	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/052	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Could the Council provide securely attached, durable hanging baskets for small food and pollinator plants for council flat residents who don't have ground level growing spaces?	The Local Plan addresses this topic through GWS1 and GWS3. However, it cannot deliver the change you have requested. We have provided colleagues in the Housing team with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/053	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Could school food growing areas be mandatory, alongside climate change education?	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 already requires new, expanded or reconfigured education facilities to have access to outdoor greenspaces and play spaces and be ideally located within a 15-minute walking radius of a park. In addition, education facilities should maximise biodiversity on site, including the provision of trees gardens, and food growing spaces.
Reg18-E-133	Climate You Change	Reg18-E-133/054	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Schools (& residents) could be encouraged to take part in National Tree Planting week.	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park and Education teams may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/055	Green and Water Spaces	GWS1 Green spaces					GWS1.1	We would very much like to ask Newham Council to include food forests in every park and food forests (or fruit tree guilds) in every green space, subject to the same considerations as above	This wording change has been made. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.
Reg18-E-133	Climate You Change	Reg18-E-133/056	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Even if space only permits the odd fruit tree/fruit bush in certain green spaces, then we ask if these can be included, to provide as much food (and therein reduced shipping miles) for Newham residents as possible.	This wording change has been made. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.
Reg18-E-133	Climate You Change	Reg18-E-133/057	Green and Water Spaces	GWS1 Green spaces					GWS1.1	Ideally where there is not enough space for full guilds comprising single fruit tree surrounded by bushes, then there can at least be beneficial ground cover designed to support the health of	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4 continues at Regulation 19 to require development to design and plan for appropriate trees and

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	hedgerows, including consideration of species size and selection.	the fruit tree (pest deterrent, weed suppression etc.)									
	This wording change has been made. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.	GWS1.1 We ask the same for nut trees (subject to sufficient surrounding space away from other trees and structures, plus tree baffles to stop squirrels eating all the nuts). Nut trees can really help with shipping miles of high protein foods.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/058	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	GWS1.1 Could there be female trees in residential streets, to not increase hay fever inducing pollen-bearing trees? Would female trees with modest quantities of small berries be acceptable?					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/059	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS1, requires the integration of food growing opportunities where feasible and practical.	GWS1.2 P.211 GWS1.2 '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.' Comment: Could Newham Council use the 15-minute Neighbourhood initiative and apply it to the concept of every resident being no more than 15 minutes via active travel from a food growing space with '15-minute Food Growing Spaces?					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/060	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/061	Green and Water Spaces	GWS1 Green spaces					GWS1.2	P.212 GWS1.2 cont. 'Many of Newham's housing estates include areas of amenity green space with limited function. Maximising the range of benefits... may include... • run-of creating community food-growing areas' Comment: We ask that Newham Council make it policy to add community food growing spaces in every housing estate where there is sufficient space. We ask that this be a mix of raised bed food growing spaces for annuals and food forests/smaller guilds of fruit trees.	A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation text to Policy GWS1 already sets out our expectation for the communal amenity green space in Newham's housing estates, which includes creating community food-growing areas.
Reg18-E-133	Climate You Change	Reg18-E-133/062	Green and Water Spaces	GWS1 Green spaces					GWS1.2	P.212 GWS1.2 cont. 'It may be appropriate to allow a net loss of open space where it can be demonstrated that it will lead to the provision of facilities that will improve the way people can use and enjoy green space. Suitable enhancements may include, but are not limited to: drinking fountains, cafes, public toilets, art, and interventions to improve nature interpretation or to enhance historical features, outdoor play, and fitness equipment.' • Comment: We understand that public toilets may need to be made available.	Support for public toilets noted.
Reg18-E-133	Climate You Change	Reg18-E-133/063	Green and Water Spaces	GWS1 Green spaces					GWS1.2	We thoroughly support the installation of water fountains, given that these reduce the need for single use plastic water bottles.	Support noted .

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		GWS1.2					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/064	Climate You Change	Reg18-E-133
	However, we ask that any other amenities, such as fitness equipment be sited on uncovered land.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 already seeks to protect green space. The criteria at Policy point GWS1.3 provides a list of exceptional circumstances where development on green space is supported where it is considered to deliver a benefit to those living in Newham whilst also improving the use and quality of the borough's green space. However, the policy point also clearly states there must be no detriment to the natural environment.										
		GWS1.2					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/065	Climate You Change	Reg18-E-133
	As with above we ask that sports and fun, active spaces don't involve solid, impermeable surface coverings and only use minimal permeable surfaces (ideally kept to a minimum).										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 already seeks to protect green space. The criteria at Policy point GWS1.3 provides a list of exceptional circumstances where development on green space is supported where it is considered to deliver a benefit to those living in Newham whilst also improving the use and quality of the borough's green space. However, the policy point also clearly states there must be no detriment to the natural environment. Furthermore, the implementation text to Policy GWS1.4 states that the design of space should maximise sustainability benefits, including the use of permeable surfaces.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/066	Green and Water Spaces	GWS1 Green spaces					GWS1.2	Also, crucially from a climate change mitigation perspective we ask that wherever possible there is no net loss of open space, given the huge part that green spaces play in protecting us all from a warming planet.	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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	A change to this policy approach has not been made. We did not consider this change to be necessary because whilst clause GWS1.3d (formerly GWS1.2d) states that development that will deliver local scale facilities which improve the usability and enjoyment of green space is acceptable, it is only permitted if certain criteria are met. Importantly, clause GWS3.d.ii requires any such development to improve the function of the green space while not having a negative impact on wildlife and biodiversity.	GWS1.2					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/067	Climate You Change	Reg18-E-133
	Support noted.	GWS1.2					GWS1 Green spaces	Green and Water Spaces	Reg18-E-133/068	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/069	Green and Water Spaces	GWS1 Green spaces					GWS1.2	We also ask that these spaces always include plants for pollinators/beneficial insects (with year-round benefits to them) and that the ground level spaces always include trees, bushes and shrubs...ideally these will provide food, plus some berries for birds	This wording change has been made. Please see the implementation text to Policy GWS1 which now makes reference to pollinators, beneficial insects and the desire for trees which provide berries for birds.
Reg18-E-133	Climate You Change	Reg18-E-133/070	Green and Water Spaces	GWS1 Green spaces					GWS1.2	Better yet still, each new area and left-over land parcels would include food forests or at the very least dependant on size, small fruit tree guilds (which can be quite modest areas of a single fruit tree supported by surrounding plants and other smaller food bearing plants). See an example below: https://www.theresiliencyinstitute.net/grow/plant-fruit-tree-guild/	This wording change has been made. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.
Reg18-E-133	Climate You Change	Reg18-E-133/071	Green and Water Spaces	GWS1 Green spaces					GWS1.2	P.213 GWS1.4 'New open space should normally be provided as green open space. New or improved hard landscaped public space, such as a public square, may be considered appropriate in certain areas.' Comment: Again, we ask that developers are not given permission to cover existing green space with hard surfaces wherever possible	A change to this policy approach has not been made. We did not consider this change to be necessary because the implementation text to clause GWS1.4 states that where green public open space is not possible, development should maximise urban greening features such as planting and permeable paving. In addition, it states that development should maximise sustainability benefits, including the use of permeable surfaces.
Reg18-E-133	Climate You Change	Reg18-E-133/072	Green and Water Spaces	GWS1 Green spaces					GWS1.2	We understand that they can be asked to create green space elsewhere. However, we feel that we really need all of the green space possible, both existing and new 6 space	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green,

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											water, access to nature, play and growing space needs.
Reg18-E-133	Climate You Change	Reg18-E-133/073	Green and Water Spaces	GWS1 Green spaces					GWS1.2	Trading some existing green space for new green space creation won't allow us to have maximised green space in the borough.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/074	Green and Water Spaces	GWS1 Green spaces					GWS1.4	P.214 GWS1.4 'increase the structural and species diversity of vegetation to improve habitat for wildlife' Comment: Could developers be given mandated targets to meet in respect of numbers of different species of trees and other vegetation that they plant? This could be a really beneficial area of policy, if used to maximum effect.	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/075	Green and Water Spaces	GWS1 Green spaces					GWS1.4	P.214 GWS1.4 cont. 'consider the suitability of the planting for the climate – thinking about drought impact, waterlogging and the potential for warmer and wetter winters and hotter summers' Could it be mandatory for developers to have to include trees, bushes and plants which can cope with a warming World and these increasing weather extremes changing conditions? We feel that it is exceptionally important that developers are held to certain mandatory standards here.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of green space improvement a site can provide will naturally vary according to the application and site context. As set out in the implementation text to Policy GWS1.4, applications for new green space should maximise sustainability benefits, including urban cooling, provide shading and sustainable drainage, including the use of permeable surfaces and, use of sustainable materials and consider the suitability of the planting for the climate – thinking about drought impact, waterlogging and the potential for warmer and wetter winters and hotter summers.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/076	Green and Water Spaces	GWS1 Green spaces					GWS1.4	P.214 GWS1.4 cont. 'rising temperatures caused by climate change is leading to longer allergy seasons and worsen air quality. Species selection should take this into account and seek to mitigate this impact' In part we feel that the issue is the prevalence of pollen bearing 'male' trees in our streets that is worsening levels and severity of hay fever. So, we very much ask for there to be mandatory policy on numbers of 'female' fruit-bearing trees against only the necessary number of male trees for pollination.	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/077	Green and Water Spaces	GWS1 Green spaces					GWS1.4	P.214 GWS1.4 cont. 'Community growing • Maximise opportunities to provide and improve access to food growing' Comment: As per our comments above, could it be mandatory for developers to include at least one good size food growing space, comprised of raised beds, plus fruit and/or nut trees, fruit bushes, food forest (space permitting, otherwise fruit tree guilds)?	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of green space improvement a site can provide will naturally vary according to the application and site context. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.
Reg18-E-133	Climate You Change	Reg18-E-133/078	Green and Water Spaces	GWS1 Green spaces					GWS1.4	[food growing] Could there be a decent minimum requirement set? Could this be for both ground level growing and some communal roof garden growing (working around the need for space for solar panels)?	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of growing space improvement a site can provide will naturally vary according to the application and site context. Please see the neighbourhood chapter and relevant site allocations which now provide details of

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											where new community growing space should come forward.
Reg18-E-133	Climate You Change	Reg18-E-133/079	Green and Water Spaces	GWS1 Green spaces					GWS1.4	Could it be mandatory for developers to include hanging baskets securely attached outside windows, for small food and pollinator-friendly plants?	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the provision of hanging baskets, is not provided in the Local Plan.
Reg18-E-133	Climate You Change	Reg18-E-133/080	Green and Water Spaces	GWS1 Green spaces					GWS1.4	On one London development close to Newham we have seen rows of a good number of raised food growing beds sited between blocks of flats. Could there be a mandatory requirement for at least one food growing space (or even a half share of a raised bed) per household in new build developments?	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of growing space improvement a site can provide will naturally vary according to the application and site context. Please see the neighbourhood chapter and relevant site allocations which now provide details of where new community growing space should come forward.
Reg18-E-133	Climate You Change	Reg18-E-133/081	Green and Water Spaces	GWS1 Green spaces					GWS1.4	P.214 GWS1.4 cont. 'Dogs • Where space allows, the provision of areas for dogs to run, explore and play of lead' Could food growing space be fenced off for this very reason and potentially to limit vandalism?	A change to this policy approach has not been made. We did not consider this change to be necessary as the fencing of a proposed growing space will be a design and site specific issue which is addressed either during the pre-application discussions or at the point of application.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-023	Community Group Representative	Reg18-T-023/001	Green and Water Spaces	GWS1 Green spaces						[Add to it] I strongly oppose plans to redevelop part of the West Ham Park. Saying how important and valuable West Ham Park is is very important. The Nursery Site should become Public Open Space to help Newham meet their Plan's commitment to create more open space for the forecast increase of nearly 100,000 people. It should not be included in the list of possible residential housing locations.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted.	[Change it] Royal Victoria Square was effectively sold off to the Sunborn and the planning given not in accordance with any Local or National Plan. Local residents have suffered for years. This precious green space should have been protected. The Strategic Planning meeting on 4 Feb 2021, was a kangaroo court where councilors were misled. What is the point of a local					GWS1 Green spaces	Green and Water Spaces	Reg18-T-107/001	Community Group Representative	Reg18-T-107

Comment Response	
Comment	plan, when subsequent decisions are made that are not in accordance with it.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	Policy GWS1(1) [and (2)] should be revised to accommodate GAIN of green space (not simply <i>no net loss</i>) and to deliver adequate green space <u>per person</u> .					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/008.a	CPRE	Reg18-E-040

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	Policy GWS1[(1) and](2) should be revised to accommodate GAIN of green space (not simply <i>no net loss</i>) and to deliver adequate green space <u>per person</u> .			2		GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/008.b	CPRE	Reg18-E-040

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 already seeks to protect green space. The criteria at Policy point GWS1.3 provides a list of exceptional circumstances where development on green space is supported where it is considered to deliver a benefit to those living in Newham whilst also improving the use and quality of the borough's green space. However, the policy point also clearly states there must be no detriment to the natural environment.	In particular, the policy “Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances”, lists an extensive set of circumstances. A stronger statement is needed to protect local green spaces e.g. “To ensure there is adequate provision of green space in the borough, no development on amenity green space will be supported except in very specific circumstances. The circumstances should be significantly restricted and emphasis placed more clearly on increasing the quantum and quality per person.”					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/009	CPRE	Reg18-E-040
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough’s green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Please see the new wording in the Neighbourhoods chapter of the Local Plan	The plan should be revised to allow for creation of 70 hectares of new public open green space including two major (15 hectare) new parks (including sports pitches) in the east and west.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/011	CPRE	Reg18-E-040

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	which sets out where the delivery of new publicly accessible open space, play and growing space will come forward.										
	Comment noted.	Newham has the least publicly accessible green space per person of any London Borough (0.71 Hectares per 1,000 people).					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/012	CPRE	Reg18-E-040
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Please see the new wording in the Neighbourhoods chapter of the Local Plan	The Plan, however, falls short of detailing where this [70 hectares of new open space] will be located. The Local Plan should be specific as follows:					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/013	CPRE	Reg18-E-040

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	which sets out where the delivery of new publicly accessible open space, play and growing space will come forward.										
	Comment noted. This site remains as designated MOL.	Beckton Sewage Works. This should be maintained as protected MOL					GWS1 Green spaces	Green and Water Spaces	Reg18-E-040/076	CPRE	Reg18-E-040
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for the relevant neighbourhoods and site allocations.	There is an opportunity here to reference the importance of green infrastructure along these routes (in connection to Policy D2.2 and Policy GWS1).		D2.2			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/064	Environment Agency	Reg18-E-145
	Support noted.	We are pleased to see a clear recognition of the role of open spaces in helping to address the climate emergency, and the identification of the potential for green and water spaces to reduce the risks associated with climate change to human health and the economy.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/086	Environment Agency	Reg18-E-145
	Support noted.	We support this comprehensive policy for green spaces, and the recognised crossover with the implementation of other policies regarding climate					GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/087	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		emergency, air quality, biodiversity, SuDs and so on.									
	Support noted.	In particular, we welcome policy requirement GWS1.1c. to maximise opportunities for improving functionality, connectivity, quality and existing of existing open space.		1c			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/088	Environment Agency	Reg18-E-145
	Support noted.	[In particular, we welcome policy requirement] As well as requirement GWSC1.1.e. for new and improved open space.		1e			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/089	Environment Agency	Reg18-E-145
	Support noted.	We are also pleased to see policy requirement GWS1.1.f. advocating the consideration of green infrastructure from the outset and the need for urban greening.		1f			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/090	Environment Agency	Reg18-E-145
	Support noted.	In reference to policy requirement GWS1.1.g., we support the need for major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement.		1g			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/091	Environment Agency	Reg18-E-145
	This wording change has been made. Please see the new wording in the implementation text to Policy GWS1.1.	Implementation section GWS1.1. should be improved to make reference to Natural England's Green Infrastructure Framework (GIF), in particular the Green Infrastructure Planning and Design Guide. (See earlier comments responding to Policy D1 Design standards & Policy D2 Public realm net gain). This guidance includes green infrastructure standards in terms of quantity, quality, and type, which	GWS1.1				GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/092	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		are particularly applicable to major developments. The framework also recommends that the Design and Access Statement includes a green infrastructure plan.									
	Support noted. This wording change has been made. Please see the new wording in the implementation text to Policy GWS1.3.	In reference to implementation section GWS1.2., we agree that maximising the multifunctional benefits of green space and green infrastructure should be a key priority for Newham's housing estates and are pleased to see a number of positive interventions are listed. Natural England's GIF should also be used here, to better explore how multifunctional of green infrastructure can be achieved.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/093	Environment Agency	Reg18-E-145
Support noted.	We welcome the policy's strong requirements for accessible open space under GWS1.4.			4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/094	Environment Agency	Reg18-E-145
This policy approach has now changed due to the need to better reflect the Environment Act 2021. Please see the new wording in Policy GWS1 which now reflects this suggested text amended.	In particular, GWS1.4.d. requires publicly accessible open space to 'maximise biodiversity'. This commitment should be strengthened to require a minimum 10% biodiversity net gain, as mandated in the Environment Act 2021 which will come into force later this year. This is also in line with draft Local Plan Policy GWS3.			4d			GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/095	Environment Agency	Reg18-E-145

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/096	Green and Water Spaces	GWS1 Green spaces			4d			In particular, GWS1.4.d. requires publicly accessible open space to 'maximise biodiversity'. This commitment should be strengthened to require a minimum 10% biodiversity net gain, as mandated in the Environment Act 2021 which will come into force later this year. This is also in line with draft Local Plan Policy GWS3.	This policy approach has now changed due to the need to better reflect the Environment Act 2021. Please see the new wording in Policy GWS1 which now reflects this suggested text amended.
Reg18-E-145	Environment Agency	Reg18-E-145/097	Green and Water Spaces	GWS1 Green spaces					GWS1.4	In reference to implementation section GWS1.4., we support the need for green and water spaces to inform the design of emerging schemes from the outset, and the message that 'green space is integral to the success of a development and should not be seen as an 'add on' at the end of the design process.' It is important to consider how it is planned and designed strategically from the outset to maximise outcomes and benefits. Additionally, we support the identified principles for improving existing and delivering new open space. A key message should be that it should be multifunctional, delivering a range of functions and benefits for people, nature, and places, and is designed to meet local needs. This is especially important in areas where provision of green and open spaces is scarce or of poorly quality.	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in Policy GWS1 which now references the Natural England Green Infrastructure Framework in the list of evidence base.	The evidence base for Policy GWS1 should be amended to include reference to Natural England's Green Infrastructure Framework – Principles and Standards for England (https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx).					GWS1 Green spaces	Green and Water Spaces	Reg18-E-145/098	Environment Agency	Reg18-E-145
	This wording change has been made. Please see the implementation text to Policy GWS1 which now includes a definition of green space. The glossary includes a definition of both green space and open space.	GWS 1 - In Part II you state 'developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances' etc. The term 'open space' is not defined. Do you mean any land that is not built on, or 'publicly accessible open space'? This should be clarified.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-044/009	Friends of West Ham Park	Reg18-E-044
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space. This includes the need to replace any lost green space in Newham of equivalent or better functionality, quality and quantity.	Given the Plan's target of creating 70 hectares of additional public open space, we believe there should be an outright ban on any development on any public open space. We understand the London Borough of Redbridge has already taken this action.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-044/010	Friends of West Ham Park	Reg18-E-044

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/016	Green and Water Spaces	GWS1 Green spaces						The Local Plan rightly places considerable importance on green and public open space provision. However, the predicted climate changes could well put at risk maintaining green space tree cover and planting through lack of accessible ground water. The Local Plan policies should, therefore, also address how ground water levels are to be retained and where necessary topped up from an element of water retention, either through natural water courses or specific storage facilities. This will be a common need for all green spaces in London, otherwise they will become 'brown-spaces with dying vegetation'.	Comment noted. The Local Plan addresses water management through Policy CE8: Sustainable drainage.
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/002	Green and Water Spaces	GWS1 Green spaces			2			Would like to see points GSW1.4d,e,f,g incorporated into GWS1.2 or change the wording of conditions in GSW1.4 to strengthen the imperative for the provision of biodiversity, climate-aware landscaping, air quality improvement, and SuDS by developers.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy clauses for GWS1 apply to all development on green space. Clause 3 (formerly 2) is intended to set out the exceptional circumstances where we would accept development on green space. In contrast clause 4 is about the delivery of new publicly accessible green space. There is no requirement to repeat requirements on development across the one policy.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy clauses for GWS1 apply to all development on green space. Clause 3 (formerly 2) is intended to set out the exceptional circumstances where we would accept development on green space. In contrast clause 4 is about the delivery of new publicly accessible green space. There is no requirement to repeat requirements on development across the one policy.	Would like to see points GSW1.4d,e,f,g incorporated into GWS1.2 or change the wording of conditions in GSW1.4 to strengthen the imperative for the provision of biodiversity, climate-aware landscaping, air quality improvement, and SuDS by developers.		4			GWS1 Green spaces	Green and Water Spaces	Reg18-K-019/003	Gasworks Dock Partnership - Cody Dock	Reg18-K-019
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 continues to require major development to provide a Design and Access Statement. The need for a Design and Access Statement is further reflected in the implementation text to Policy GWS1.	GWS1.1 The imperative should be on developers to demonstrate in their Design & Access Statements how, through integrated design, they can set aside and improve green space for wildlife.					GWS1 Green spaces	Green and Water Spaces	Reg18-K-019/004	Gasworks Dock Partnership - Cody Dock	Reg18-K-019
	A change to this policy approach has not been made. We did not consider this change to be appropriate. The Green and Water Spaces Infrastructure Strategy (2024) has provided up-to-date evidence to support this chapter and its targets. It has mapped Newham's existing green and water spaces and set out where we can make improvements to deliver an enhanced network of spaces. The mapping behind the Strategy has established that the provision of publicly accessible greenspace should not fall below 0.71 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an	GWS1.1 "There is potential to increase publicly accessible green space per 1,000 residents beyond maintaining the already-low rate evident in the borough. Greater ambition is required so that this can be increased from the suggested maintenance of 0.71 hectares per 1,000 residents (or the proposed 0.56 hectares per 1,000 residents by 2038 taking into account population increases) to 1.00 ha/1,000 residents by 2038." "					GWS1 Green spaces	Green and Water Spaces	Reg18-K-019/005	Gasworks Dock Partnership - Cody Dock	Reg18-K-019

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	ambitious but realistic level of publicly accessible greenspace provision.										
	Support noted.	Other comments to assist the Council Draft Policy GWS1 (Green spaces) includes a proposed requirement at part 3 for development referable to the Mayor of London to provide on-site publicly accessible open space. Whilst this ambition is broadly welcomed and GLP are aiming to deliver high quality public realm as part of development of the Site		3			GWS1 Green spaces	Green and Water Spaces	Reg18-E-113/026	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113
	This policy approach has now changed due to policy point GWS1.3 being moved to now be part of clause 1 of GWS1. Please see the new wording in GWS1. The change you have suggested has not resulted in a change as we did not consider this change to be necessary as there is a need to deliver more green space to meet the needs of the increase in population growth over the Plan period. It is important we specify where green space will be required, otherwise we are unlikely to deliver the 61ha of new publicly accessible green space needed to maintain our currently open space standard, which is	[Whilst this ambition is broadly welcomed and GLP are aiming to deliver high quality public realm as part of development of the Site], the policy should confirm that this requirement will only be applicable where appropriate, proportionate and having regard to the nature of development being brought forward. This is to reflect the high land take of industrial development and the particular security requirements for data centre development. Recommendation 6: Amend draft					GWS1 Green spaces	Green and Water Spaces	Reg18-E-113/027	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Policy GWS1 part 3 to add “where appropriate, proportionate and compatible with the development”.	already low when compared to neighbouring boroughs.
Reg18-E-093	Greater London Authority	Reg18-E-093/030	Green and Water Spaces	GWS1 Green spaces						The Mayor welcomes the additional clarity provided in terms of the additional goals for each site in Table 1. The borough may want to consider if it is further guidance or part of the policy itself.	Support noted. A wording change has been made, in alignment with this suggestion. Policy GWS1 now guides the reader to Newham's Green and Water Infrastructure Strategy (2024) which provides further detail on the location which will experience the highest level of need, with regard to green space, over the Local Plan period.
Reg18-E-093	Greater London Authority	Reg18-E-093/031	Green and Water Spaces	GWS1 Green spaces						The Mayor supports the development of a ‘Newham Open Space standard’ on a per population basis which can assist with identifying areas of deficiency.	Support noted.
Reg18-E-093	Greater London Authority	Reg18-E-093/032	Green and Water Spaces	GWS1 Green spaces						The borough should consider open space categorisations set out in Table 8.1 of the London Plan and policy should protect and promote new areas, while ensuring that open space secured as part of a development remains publicly accessible.	A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation text to Policy GWS1 already makes clear reference to Table 8.1 of the London Plan. These categorisations have also been used in Newham's Green and Water Infrastructure Strategy (2024).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/033	Green and Water Spaces	GWS1 Green spaces						The Mayor welcomes that the draft plan recognises the open space deficiency and uneven distribution of open space in the borough and has a targeted policy approach to maintain and provide additional open space to fulfil the needs of the community.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/140	Green and Water Spaces	GWS1 Green spaces			5			Policy GWS1.5 requires that new open space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a 15-year period will be secured through a legal agreement	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.
Reg18-E-130	Hadley Property Group	Reg18-E-130/141	Green and Water Spaces	GWS1 Green spaces			5			Where it is agreed that the publicly open space will not be adopted, a Management Plan should be provided which demonstrates how requirements of the Public London Charter principles will be met and implemented.	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.
Reg18-E-130	Hadley Property Group	Reg18-E-130/142	Green and Water Spaces	GWS1 Green spaces			5			The ability to transfer land ownership should be an option rather than automatic and should be agreed on a site-by-site basis	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured

Comment Response	through a legal agreement (Section 106) or planning condition.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the need for green space over the Plan period is such that we need to protect and enhance Newham's existing assets. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard	However, there are several blanket restrictions in this chapter including development on open spaces, including land within private ownership (Policy GSW1);[...] Such restrictions can, especially on smaller sites, limit the likelihood of infill housing development to come forward. These policies should be amended to consider the quality of existing green spaces and infrastructure, against the planning benefit of a scheme, including any replacement green infrastructure.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-096/022	L&Q	Reg18-E-096

Comment Response	we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space. However, please also note the flexibilities around housing estate amenity land at clause 3.c should certain criteria be met.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Greenspaces and Water Spaces The Authority supports the comprehensive policy for green [...] (GWS1 [...]). These policies seek to protect and enhance the varied and multiple functions provided by green [...] spaces and maximise opportunities to improve their quality, accessibility and connectivity.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-097/026	Lee Valley Regional Park Authority	Reg18-E-097
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the regarding the specific uses on offer in West Ham Park, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. As a result of this work, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it	West Ham Park needs growing spaces and community compost - perfect space which isn't used - opportunity to create an urban farm.					GWS1 Green spaces	Green and Water Spaces	Reg18-D-001/014	Local Plan Drop-In	Reg18-D-001

Comment Response	is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	West Ham Park Nursery site. Green space infrastructure map. Site is being shown as the same way as housing. Would like the maps to show the nursery site to be shown as open space like the rest of the park. Land registry shows it as part of the site.					GWS1 Green spaces	Green and Water Spaces	Reg18-D-001/129	Local Plan Drop-In	Reg18-D-001

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	West Ham Park Nursery site. Do not support City of London plans.					GWS1 Green spaces	Green and Water Spaces	Reg18-D-001/130	Local Plan Drop-In	Reg18-D-001

Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/131	Green and Water Spaces	GWS1 Green spaces						West Ham Park. The map in the Green Infrastructure study shows the site the same as housing and will help the corporation of london with their plans. Unsupportive of attempting to block the plans. Shows the north east as grey.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	Open up Beckton Alps Please! We used to be able to use it. Please keep as green space.					GWS1 Green spaces	Green and Water Spaces	Reg18-D-001/132	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. We welcome our partnership working on green infrastructure which ensures we maximise opportunities for connected green space.	Green and Blue Infrastructure and Epping Forest SAC Many Newham residents benefit from the proximity of open spaces within Redbridge, and Wanstead Flats is valued by Newham residents. We should continue to work together to ensure we maximise opportunities for connected green infrastructure as well as to meet carbon neutral and net zero					GWS1 Green spaces	Green and Water Spaces	Reg18-E-135/008.a	London Borough of Redbridge	Reg18-E-135

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		carbon targets in an integrated manner across Northeast London.									
		Policy GWS1: Green Spaces In general, we welcome the content included in this policy					GWS1 Green spaces	Green and Water Spaces	Reg18-E-084/014.a	London Historic Parks and Gardens Trust	Reg18-E-084
	This policy approach has now changed due to the need to address the impact on development on existing open space. Please see the new wording in the implementation text to Policy GWS1.4.	Policy GWS1: Green Spaces Please add a specific sub-policy in the 'Implementation' section to address the impact of development on existing open space, as the balance is currently weighted towards how new open space should be implemented. Adequate protection of existing space is crucial to combatting open space deficiency in the borough. This sub-policy should require developments affecting existing green open space to consider and address: • Views into and out of green open space • The provision of natural light (we would ask that Newham commits to a figure higher than the BREAM standard of 2 hours direct sunlight at the Equinox, with particular emphasis on protecting play areas and sites requiring greater biodiversity and horticultural interest.)					GWS1 Green spaces	Green and Water Spaces	Reg18-E-084/014.b	London Historic Parks and Gardens Trust	Reg18-E-084

Comment Response	
Comment	• The requirements to ensure adequate budgets/plans are in place to ensure the maintenance of existing open space in the case of intensification of use.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not								Reg18-E-084/015	London Historic Parks and Gardens Trust	Reg18-E-084

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to make some of the suggested amendment. Please see the new wording in implementation point GWS1.1. Please note that we did not think it necessary to make the second part of the suggested amend. Instead, we have added detail to this implementation point to make it clear that the development or enhancement of existing outdoor sport and/or recreational facilities on green space must be for green space dependent uses and, should be of an appropriate scale and be developed in accordance with Local Plan Policies SI2 and SI3. Green space dependant uses can include, but are not limited to sports pitches, outdoor classrooms or cultural uses such as an amphitheatre.	Policy GWS1.2 notes that 'It may be appropriate to allow a net loss of open space where it can be demonstrated that it will lead to the provision of facilities that will improve the way people can use and enjoy a green space. Suitable enhancements may include, but are not limited to: drinking fountains, cafes, public toilets, art, and interventions to improve nature interpretation or to enhance historical features, outdoor play, and fitness equipment. Importantly, any such additions should not have a negative impact on wildlife and biodiversity.' In its current format, this paragraph is inconsistent with the council's commitment to 'protect all existing open space' (GWS1.1). We ask that it is adapted as follows: 'It will only be appropriate to allow a net loss of open space when it will lead to the provision of necessary facilities that will improve the way people can use and enjoy a green space. Public stakeholders must be consulted on the need for any proposed facilities and any form the facilities might take. To be deemed necessary, these facilities must be shown to be: lacking elsewhere; and seen as an enhancement to the open spaces desired by the current users of the					GWS1 Green spaces	Green and Water Spaces	Reg18-E-084/016	London Historic Parks and Gardens Trust	Reg18-E-084

Comment Response	
Comment	open space. It will not be acceptable to propose potential enhancements to public open space as a means of justifying net loss unless the above criteria have been satisfied. Suitable enhancements may include, but are not limited to: drinking fountains, cafes, public toilets, art, and interventions to improve nature interpretation or to enhance historical features, outdoor play, and fitness equipment. Importantly, all such necessary additions must show a neutral or positive impact on wildlife and biodiversity.'
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/053	Green and Water Spaces	GWS1 Green spaces						Policies Map. There is also a general issue around built venues and some sites currently identified as development plots within a site allocation in the LLDC Local Plan as now being shown as Open Space.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024). Please see the amendments to the Policies Map which is published alongside the Regulation 19 consultation.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/055	Green and Water Spaces	GWS1 Green spaces						Policies Map. These are matters that have the potential for significant impact on future planned and permitted development within QEOP and may have an adverse impact on the operation of the QEOP as Parkland that meets the needs of East London and so some amendments are requested in the detailed comments that follow.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024). Please see the amendments to the Policies Map which is published alongside the Regulation 19 consultation.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/112	Green and Water Spaces	GWS1 Green spaces						The policy makes reference to Metropolitan Open Land (MoL) rather than providing detail of the policy approach. It would be helpful for the policy to include some additional text which makes specific reference to the 'very special circumstances' test: "maintaining the open character of Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy, <u>except in very special circumstances</u> ; and".	A change to this policy approach has not been made. We did not consider this change to be necessary, please see the Newham's MOL Review 2024, published in conjunction with the Regulation 19 Local Plan consultation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/113	Green and Water Spaces	GWS1 Green spaces					Implementation	And additional supporting text in the 'Implementation' section to clarify the circumstances that are more likely to either be seen as maintaining 'openness' or meet the 'very special circumstances test': <u>"Within areas of MoL, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is that which would enhance the quality and function of the MoL for example, by providing new or enhanced outdoor recreation facilities, enabling alteration of, or replacing existing buildings."</u>	This policy approach has now changed due to the need to provide the clarity on the approach to MOL, as suggested. Please see the new wording in the implementation text to Policy GWS1.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/114	Green and Water Spaces	GWS1 Green spaces			2			Part 2 of the policy applies a test of 'exceptional circumstances'. While this is supported, there is the potential for different interpretations of how the criteria that follow will apply to any one specific site or example. It is suggested that the initial sentence of Part 2 is reworded to read <u>"Developments on open space (excluding Metropolitan Open Land) will only be supported where the following relevant exceptional circumstances apply"</u> :	A change to this policy approach has not been made. We did not consider this change to be necessary, please see the Newham's MOL Review 2024, published in conjunction with the Regulation 19 Local Plan consultation.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to include a clause regarding new or enhanced outdoor recreational facilities. Please see Policy GWS1.	It is also suggested that to be clear about what is likely to be acceptable in open spaces of greater than local scale, that an additional point 2.d.iv is added to read: <u>“iv. the development would enhance the quality and function of the open space by providing new or enhancing existing outdoor recreational facilities, enabling alteration or replacement of existing buildings”.</u>		2d			GWS1 Green spaces	Green and Water Spaces	Reg18-E-052/115	London Legacy Development Corporation	Reg18-E-052
	A change to this policy approach has not been made. We did not consider this change to be appropriate since this list was worked on and is for the benefit of GiGL. Information on data standards can be found on the Greenspace Information for Greater London CIC website: https://www.gigl.org.uk/recording-surveying/links-and-resources/survey-data-standards-and-guidance/	GWS1.1 The policy includes a reference to 'public realm - hard landscaping'. It would be helpful to broaden this definition to Include additional functions and qualities – e.g. SuDs/trees/planting/social spaces - beyond just hard landscaping features					GWS1 Green spaces	Green and Water Spaces	Reg18-E-052/116	London Legacy Development Corporation	Reg18-E-052
	This wording change has been made. Please see the new wording in the implementation text for Policy GWS1 which now provides clarification on different types urban greening features.	It would be helpful to widen the potential ways of adding to green infrastructure – e.g planters, balcony planters, roof gardens, podiums, green walls, window boxes etc - not just street greening.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-052/117	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	Policy GWS1: Green Spaces Bow Goods Yard is located adjacent an area to the north east which is proposed to be designated as open space. Draft Policy GWS1 (Green Spaces) seeks for development to provide or help to deliver easy access to a network of high-quality green spaces. Part D of this policy which requires development next to green space to not negatively impact its functionality, quality and accessibility is supported. Any future development proposals that come forward at Bow Goods Yard will need to consider the adjacent green space and improving access to it could be a significant improvement of any scheme.		1d			GWS1 Green spaces	Green and Water Spaces	Reg18-E-019/013	Network Rail - Bow Goods Yard	Reg18-E-019

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	...Firstly, the open space at NewVlc - which should more appropriately be described as incidental areas of land - is not of 'public benefit', as there is no public access to the campus, for very clear safeguarding reasons. Secondly, these incidental areas do not offer 'important opportunities for sport and recreation'. Thirdly, for the most part, the areas designated on the proposal map as 'open space' at NewVlc comprise concrete footpaths, access roads, hardstanding between buildings, courtyards, external fire escape routes and do not in the slightest fall within the definition of open space. Fourthly, the designated areas do not 'act as a visual amenity' as referred to in the definition as they are largely obscured from public viewpoints and could at best be described as gaps between buildings....		4			GWS1 Green spaces	Green and Water Spaces	Reg18-K-040/002	Newham 6th Form College	Reg18-K-040

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	A change to this policy approach has not been made. We did not consider this change to be necessary, please see the Newham's MOL Review 2024, published in conjunction with the Regulation 19 Local Plan consultation.	Furthermore, Policy GSW1 uses an 'exceptional circumstance' test for any development on open space which should only be used in respect of green belt/MOL."		4			GWS1 Green spaces	Green and Water Spaces	Reg18-K-040/003	Newham 6th Form College	Reg18-K-040
	A change to this policy approach has not been made. The Local Plan cannot deliver the change you have requested. However, it should be noted there are 5 dogs on leads control orders in Newham, please see here for further information: https://www.newham.gov.uk/public-health-safety/dog-care-control . Here is list of the streets, play areas, parks and other open	[Change] [Revise dog signage in parks] enforcement					GWS1 Green spaces	Green and Water Spaces	Reg18-Ap-001/100	Plaistow Assembly	Reg18-Ap-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	spaces where you must follow orders to control dog movements and waste: https://www.newham.gov.uk/downloads/file/103/here-is-list-of-the-streets-play-areas-parks-and-other-open-spaces-where-the-orders-apply- . We have also provided the Parks team with your comments.										
	Comment noted. Policy GWS4 continues to require a Tree Management Plan for developments which have in place or deliver new trees.									Plaistow Assembly	Reg18-Ap-001
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.									Plaistow Assembly	Reg18-Ap-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy CE6: Air Quality includes a requirement for air monitoring.	Monitorin g		1e						Resident	Reg18-E-082
	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy CE6: Air Quality includes a requirement for air monitoring.	Monitorin g		1c						Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		be paid for by developer contributions].									
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our								Reg18-E-088/001	Resident	Reg18-E-088

Comment Response	communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	I also oppose the building of flats on the Nursery site of West Ham park. This site urgently needs to be made public open space because the park is already well used and as previously stated, the rise in Newham's population means it's absolutely necessary to expand West Ham Park.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-088/002	Resident	Reg18-E-088

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
		Stratford Park. Make use of historic buildings [...]. Hopefully this will increase use, reduce anti-social behaviour and improve the environment.							Reg18-E-123/002	Resident	Reg18-E-123

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	[Stratford Park] Consider the advantages of combining the park management with the neighbouring (City of London) West Ham Park.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-123/004	Resident	Reg18-E-123
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	am very disappointed that it does not mention an amplification of and more large green spaces for mixed recreation purposes with plenty of green Nature. It states that Newham has a low green space of around 13% as opposed to 39% London wide. I really think this should be focussed upon, particularly with so much new housing, this borough will be far more populated, as the report predicts. So if now there's a shortage of space, later it will be worse					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/001	Resident	Reg18-E-002
	Comment noted. The policies in the Local Plan seek to protect existing green space and deliver more to support the projected population growth. Over the Local Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need	Where are the spaces for larger open areas to be? A tiny green space outside blocks of flats just doesn't cut it. We need decent sized parks for every 'hub' area at least, as well as making good the deficiency already there					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/002	Resident	Reg18-E-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. Please see the policies in the Green and Water chapter, the Neighbourhood chapter and relevant site allocations.										
	Comment noted. The Regulation 18 Local Plan green space allocations were informed by the Interim Green and Water Infrastructure Strategy (2022). This evidence has been refined and finalised and has informed the latest requirements for green space set out in the Local Plan's Site Allocations. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	That means more infrastructure and despite what the building companies say, we all know green space amongst other things falls far short of what it should be.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/014	Resident	Reg18-E-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not								Reg18-E-002/015	Resident	Reg18-E-002

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	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	You can't go there as it's just not pleasant with so many people, and they are building all those new blocks - where are those people going to find leisure?								Reg18-E-002/016	Resident	Reg18-E-002
	Comment noted. The Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. Please see the Green and										

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	Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.										
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to highlight the importance of the multi-functionality of open space and seek to protect and improve Newham's green assets. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	Green doesn't just mean a few plants or patch of grass, it means places where people can walk in nature, in trees and landscaped areas with plants, places for sports and other recreational activities for children and young people as well as adults					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/017	Resident	Reg18-E-002

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	Please don't build at the expense of green spaces that have the facilities above mentioned. Places like West Ham park, which isn't funded by Newham council.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/018	Resident	Reg18-E-002

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. Over the Local Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. The Local Plan aims to maintain 0.71 hectares publicly accessible green space per 1,000 residents over the Plan period. A target of 3 hectares per 1,000 residents, a figure from Natural England, is a national ambition and, as such, it does not consider local circumstances. Whilst desirable, a 3 hectare per 1,000 target is not be a deliverable figure for Newham given its population density and the percentage of land in the borough which has already been built on.	Newham should be able to provide the official recommended green space per head of population					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/019	Resident	Reg18-E-002

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	On the subject of West Ham park, there is a proposal - sneaking in through the back door without proper public consultation - to sell some of the park space for new blocks of flats. All the residents around do not want to see this happen. The area should be returned to park space. It is up for Newham council approval. Please do not approve it.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/020	Resident	Reg18-E-002

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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to	Where is all the new green space for these people?.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/037	Resident	Reg18-E-002

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	the borough's green, water, access to nature, play and growing space needs.										
	Comment noted. The policies in the Green and Water chapter, the Neighbourhood chapter and relevant site allocations seek to deliver green space of a size and quality to meet the needs of the population over the Plan period. These policies have been informed by the Green and Water Infrastructure Strategy (2024). The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements a site allocation is providing. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	Large green spaces - not token ones.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/039	Resident	Reg18-E-002

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	Surely, with all the other new housing we need every inch of space more we can get, not to decrease the area available to all. Please vote against the planning permission					GWS1 Green spaces	Green and Water Spaces	Reg18-E-002/048	Resident	Reg18-E-002

Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. The policies in the Local Plan seek to protect existing green space and deliver more to support the projected population growth. Over the Local Plan period, Newham’s population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. Please see the policies in the Green and Water chapter, the Neighbourhood chapter and relevant site allocations.	We are wishing there are more green spaces or commercial spaces around as we have arrival of so many new residents looking at the flats under construction by hallsville and manor road quarter scheme in addition to Brunnel street works				N5.S A4 Lim mo	GWS1 Green spaces	Green and Water Spaces	Reg18-E-006/002	Resident	Reg18-E-006
	Comment noted. Policies in the Green and Water Spaces chapter seek to deliver inspiring green spaces which are to the benefit of both people and the environment. This approach has been evidenced by Newham's Green and Water Infrastructure Strategy (2024).	We are wishing there are more green spaces or commercial spaces around as we have arrival of so many new residents looking at the flats under construction by hallsville and manor road quarter scheme in addition to Brunnel street works				N5.S A4 Lim mo	GWS1 Green spaces	Green and Water Spaces	Reg18-E-008/002	Resident	Reg18-E-008

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/068	Green and Water Spaces	GWS1 Green spaces						7 Green space and allotments Pages 208/211. Newham possesses relatively little accessible green space, far below that of adjacent Boroughs (p 210) and, with a high volume of further development and the associated population increase, proportionally more such space needs to be created for health, leisure and nature activities.	Comment noted.
Reg18-E-098	Resident	Reg18-E-098/069	Green and Water Spaces	GWS1 Green spaces						With the Manifesto commitment to growing more food in the Borough and the attested physical and mental benefits associated with tending an allotment, their paltry number needs to be substantially increased.	Comment noted.
Reg18-E-098	Resident	Reg18-E-098/070	Green and Water Spaces	GWS1 Green spaces						Over the DP period we should commit to increasing the volume of publicly accessible space per 1000 residents.	A change to this policy has not been made as, over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain

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	the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development.										
	A change to this policy has not been made as, over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that growing space provision remains the same (i.e. current provision is sustained and no new sites are added) growing space the rate of provision will decrease to 0.037 Ha/ 1,000 HoP. To meet the NAS standard the Borough would have to provide an additional 57 Ha of growing space. In a borough where there is a need for more publicly accessible open space and where land for development is vying for other uses, not least housing, delivering an additional 57 Hectares of growing space would not be deliverable. The Local Plan therefore seeks to protect the current rate of growing space which is 0.046 ha of community growing space per 1000 residents. We acknowledge this will mean	Given that "the National Allotment Society recommends the provision of 0.125 hectares per 1000 residents" of allotments and growing area spaces (p.210) and the stated aim is to "maximise opportunities to provide and improve access to food growing" (see Community growing p.214), we should aim to double the present 0.047 hectares available per 1000 residents.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-098/071	Resident	Reg18-E-098

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	that we will not meet the National Allotment Societies standard, however it will still require the provision of additional growing space. The Neighbourhood chapter and site allocations have been revised since Regulation 18 to stipulate where we would expect to see new community growing space coming forward.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as this is the approach of Policy GWS3, please note the implementation text which provide details on the types of living building materials which could be delivered to enhance biodiversity. Examples of living building elements include, but are not limited to: • green and brown roofs • green walls • swift bricks and artificial nest sites • roost bricks for bats and designing lighting in a bat friendly way • ensuring boundaries allow hedgehogs to move freely • nature based Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscape form and vegetation.	8 Urban greening See P220. Stronger resolve needs to be shown in requiring developments in areas of poor natural environment to improve its quality or substantially compensate for any detriment they have caused.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-098/072	Resident	Reg18-E-098

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	This wording change has been made. Please see the new wording in GWS3.	Development in areas deficient in access to nature should deliver (rather than seek to deliver) new or improved green or water spaces which have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-098/073	Resident	Reg18-E-098
	Comment noted. This part of the Plan has now been changed. Please see new wording in Policy GWS1.	Where this is not possible development should deliver (again rather than seek to deliver): a. habitation creation... b environmental interpretation materials... c. improved walking routes... in order to strengthen the requirement to compensate nature for development, particularly given the justifications on p.221 that “as an urban borough, Newham’s network of natural spaces act as a green lung, protecting biodiversity by giving much needed space for wildlife...” and “as the number of homes increases over the plan period it will be of fundamental importance to match this growth by protecting and improving existing natural spaces...”.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-098/074	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	"There are several large areas of green space that are closed to the public next to the North Circular. There's one with a large gas holder, and one owned by Lady Trower Trust. Both of these pieces of land used to be playing fields - but they have been closed to the public for many years. Is there a reason these playing fields cannot be opened to the public, or turned into something useful like allotments? It seems a real shame that a dense borough like ours cannot use clearly available green space."		1			GWS1 Green spaces	Green and Water Spaces	Reg18-K-003/015	Resident	Reg18-K-003

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	West Ham Park nursery site should be preserved as green space. It currently is being sold by the Corporation of the City of London to a residential property developer. Either this should be stopped and the land returned to the park (where it belonged originally), or the development should be considered a site and guidelines be imposed to benefit the area (such as creating a cafe, children centre and community space in West Ham Park... and also the style of buildings, affordable housing etc.). The fact that the nursery of west ham park is being shown on the map as a "derelict" area that's outside West Ham park is misleading and should be corrected please - it is inside the park boundary. [A:3] [originally submitted against clause 5 of BNF1 Spatial Strategy]					GWS1 Green spaces	Green and Water Spaces	Reg18-K-004/001	Resident	Reg18-K-004

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	West Ham Park is a very important green space Stratford. It came into its own as a place of safety and solace during the Pandemic. [Originally Submitted on Section 1: All about Newham.]					GWS1 Green spaces	Green and Water Spaces	Reg18-K-008/001	Resident	Reg18-K-008

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	"GWS1. I welcome the commitment in GWS1 to protecting existing open space to ensure no net loss and the commitment to ensuring that development next to green space does not negatively affect its quality.					GWS1 Green spaces	Green and Water Spaces	Reg18-K-032/001	Resident	Reg18-K-032

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	it should be 'increasing' open space, on top of protecting existing			Table 14: Open Space Deficiency		GWS1 Green spaces	Green and Water Spaces	Reg18-K-033/004	Resident	Reg18-K-033

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. In September 2021 the Cabinet made a decision to close Newham City Farm (meeting held on 7 September 2022). The Council has been 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 has been an integral part of co-designing the future of this area. On Tuesday 30 January 2024 Newham Council Cabinet approved the Beckton Parks Masterplan. The Masterplan proposes that the former Newham City Farm site is redesigned to create a new community farm with green skills hub. The site will be reconfigured and an operator will be sought to take on management of the new offer. More information can be found here: https://newhamco-create.co.uk/en/projects/becktonparksmasterplan	Newham City Farm should be re-opened with animal offer					GWS1 Green spaces	Green and Water Spaces	Reg18-K-047/009	Resident	Reg18-K-047

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	According to this plan Newham has the least publicly accessible green space per person of any London Borough. Furthermore, there is the requirement for at least 70 hectares of new open space and parkland. If this site were sold by the Corporation of London for the development of flats this would appear to work in opposition to the London Borough Of Newham's own objectives. As a result I would urge the council to use this plan to resist any attempt by the City of London Corporation to gain planning permission for housing on this site. [originally made: Neighbourhoods, N9 West Ham]					GWS1 Green spaces	Green and Water Spaces	Reg18-K-052/002	Resident	Reg18-K-052

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-002/065	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-002/066	Resident	Reg18-T-002

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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/068	Green and Water Spaces	GWS1 Green spaces						[Change it] YOUR CURRENT GREEN SPACES PLAN DOES NOT EVEN MENTION PLASHET PARK.	The Interim Green and Water Infrastructure Strategy (2022) mapped the open space provision at Plashet Park. Neighbourhood N13 in the Regulation 18 Local Plan also highlighted the importance of Plashet Park. Please note that the Strategy has since been completed and the Neighbourhood Chapter of the Local Plan has been updated, for Regulation 19, to include further detail on green space provision and information on neighbourhood-specific improvements required in Newham.
Reg18-T-002	Resident	Reg18-T-002/069	Green and Water Spaces	GWS1 Green spaces						[Change it] WE NEED TO SEE A ROADMAP SPECIFIC TO THE PARK IN QUESTION TO BE ABLE TO COMMENT MEANINGFULLY. STRATEGY NEEDS TO COME FIRST IN CONSULTATION WITH LOCAL RESIDENTS; PLANTING AND LAND MANAGEMENT DECISION NEEDS TO FOLLOW THAT STRATEGY - NOT THE OTHER WAY AROUND.	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through

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	consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.										
	[Add to it] The plan acknowledges their is a lack of green space in Newham; Canning Town is an area that especially lacking, and I hope there is some consideration to address this in the plan with a genuinely desirable green space.								Reg18-T-003/001	Resident	Reg18-T-003
	[Add to it] At the moment Canning Town is having most of the development areas taken up with high rises, and where "green space" is tacked on as uninspired courtyards beside the buildings.								Reg18-T-003/002	Resident	Reg18-T-003

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Strategy seeks to deliver improvements to this area of the borough.										
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.	[Add to it] There was once a creative vision for the development of a park at Limmo Peninsula, named the Exotic Wilds, that seemed genuinely wonderful, to develop the park as a priority.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-003/003	Resident	Reg18-T-003
	Comment noted. The Regulation 18 Local Plan green space allocations were informed by the Interim Green and Water Infrastructure Strategy (2022). This evidence has been refined and finalised and has informed the latest requirements for green space set out in the Local Plan's Site Allocations. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Add to it] I realise there is a need for housing but there are so many developments already planned in the are. I also realise that funding is difficult, and the easy option is to have the developer add something to sit in the shadows of their towers, where the sum of these parts make a pretty underwhelming whole. Are there not alternatives? Can developers not be awarded a particular site, on the basis that they contribute to a larger separate area specifically for a park?					GWS1 Green spaces	Green and Water Spaces	Reg18-T-003/004	Resident	Reg18-T-003

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.	[Change it] The plan document states, "Developments on open space... will only be supported in exceptional circumstances where: a. it will not create or increase open space deficiency (at any scale)," and "The Local Plan seeks to protect all existing open space." With these two statements in mind, how can the council justify the building of a new					GWS1 Green spaces	Green and Water Spaces	Reg18-T-005/001	Resident	Reg18-T-005

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		development on Limmo Peninsula, where a green space could be built instead?									
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.	[[Change it] The plan document states, "Developments on open space... will only be supported in exceptional circumstances where: a. it will not create or increase open space deficiency (at any scale)," and "The Local Plan seeks to protect all existing open space." With these two statements in mind, how can the council justify the building of a new development on Limmo Peninsula, where a green space could be built instead?] Especially as the area is growing rapidly, with at least three other new developments in the immediate vicinity, including the one by City Hall, the one where Wickes used to be, and Hallsville Quarter, not to mention the recently built Brunel Street Works - in an area which already has the most severe lack of green space?					GWS1 Green spaces	Green and Water Spaces	Reg18-T-005/002	Resident	Reg18-T-005
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which	[Change it] Please turn Limmo Peninsula into a full green space (a 'pocket park' will not achieve the purpose) for the area which already severely lacks. Thank you!					GWS1 Green spaces	Green and Water Spaces	Reg18-T-005/003	Resident	Reg18-T-005

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	sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.										
	Comment noted. The findings of Newham's Green and Water Infrastructure Strategy (2024) indeed indicate that the Canning Town area is one of the least well served in terms of access to green space. The accompanying Action Plan to the G&W Strategy seeks to deliver improvements to this area of the borough.	[Add to it] There is acknowledgment in the plan that Newham is lacking in green spaces. I'd like to emphasise that Canning Town fairs particularly bad in available green space, and hope there are some plans to address this area.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-007/001	Resident	Reg18-T-003

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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which sets out the ambition for a new park at N4.SA4 Limmo which should maximise the	[Add to it] There was once a creative vision for Limmo Peninsula named the 'Exotic Wilds' that sounded genuinely wonderful. This is a unique area, with some great heritage from the Thames Ironworks, and is an ideal area for a					GWS1 Green spaces	Green and Water Spaces	Reg18-T-007/003	Resident	Reg18-T-003

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.	park that Canning Town could be proud of.									
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of	[Add to it] I realise getting funding is complicated, and easy to be one dimensional and default to allocate and area to a high rise developer with some conditions, but this usually results in an uninspired courtyard at the base of a building. Sure it might serve as a box ticking exercise, but is it actually good urban planning? Are there not alternatives?					GWS1 Green spaces	Green and Water Spaces	Reg18-T-007/004	Resident	Reg18-T-003

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	planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.										
	A change to this policy approach has been made due to the completion of Newham's Green and Water Infrastructure Strategy (2024). Please see the new policy wording for neighbourhood N4: Canning Town which sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.	[Add to it] For example, can developers only be awarded a particular area of land to develop, with a condition that they agree to contribute to a separate larger area to be solely developed as a park, like the Exotic Wilds?					GWS1 Green spaces	Green and Water Spaces	Reg18-T-007/005	Resident	Reg18-T-003
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 addresses the need for biodiversity improvements.	[Add to it] I would like to see some clause introduced which would insist on measurable biodiversity increases at existing and new developments.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-011/015	Resident	Reg18-T-011

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not								Reg18-T-011/016	Resident	Reg18-T-011

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
		[Add to it] I'd like to see more monitoring and accountability applied to promises of biodiversity gains.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-011/017	Resident	Reg18-T-011

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-014	Resident	Reg18-T-014/001	Green and Water Spaces	GWS1 Green spaces						[Change it] It is very important to save green space and open public green space. The proposals say this.	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.
Reg18-T-014	Resident	Reg18-T-014/002	Green and Water Spaces	GWS1 Green spaces						[Change it] But in regard to West Ham park nursery area it is designated for homes. This area is already part of the green open public space that is West Ham Park. The council proposals should change to include this area as public open space to be developed as green public open space.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in

Comment Response	2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-T-014	Resident	Reg18-T-014/004	Green and Water Spaces	GWS1 Green spaces						[Change it] Children above all need access to as much open green space as possible.	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. The G&W Strategy (2024) has provided evidence to support this chapter. It has mapped Newham's existing green and water spaces and set out where we can make improvements to deliver an enhanced network of spaces. This work includes an assessment of the amount and quality of play space in Newham.	This is an ideal opportunity to ensure that we properly plan the management of Newham in to the future. My main concern is that, at the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. Given the Newham population is expected to increase by 2038 by c.100,000 people, this means that there is a requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. That is good news. [Origionally Submitted on Section 1: All about Newham.]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-025/005	Resident	Reg18-T-025

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-T-025	Resident	Reg18-T-025/015	Green and Water Spaces	GWS1 Green spaces						[Add to it] As noted, we need to provide for more green space and not less. This is an ideal opportunity to ensure that we properly plan the management of Newham in to the future. My main concern is that, at the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. Given the Newham population is expected to increase by 2038 by c.100,000 people, this means that there is a requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. That is good news. [originally GWS4 Trees and hedgerows]	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add to it] Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland. My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland. [originally GWS4 Trees and hedgerows]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-025/018	Resident	Reg18-T-025

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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
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	plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.	build blocks of flats. As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less. This area could easily be brought back into open space use. [originally GWS5 Play and informal recreation for all]									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not								Reg18-T-026/014	Resident	Reg18-T-026

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	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	Support noted.	[Add to it] Add more living wall and roof gardens to new developments.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-026/015	Resident	Reg18-T-026

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	A change to this policy approach has not been made. We did not consider this change to be necessary as the setting of Tree Preservation Orders sits outside of the Local Plan process. Policy GWS4 continues to seek to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made. Your comment regarding Woodgrange Park Cemetery has been passed onto Newham's Parks team.	[Add to it] Also set more Tree Protection Order zones. Cemeteries should all be under TPOs. Specifically Woodgrange Park Cemetery					GWS1 Green spaces	Green and Water Spaces	Reg18-T-026/016	Resident	Reg18-T-026

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change it] As a mother and resident, I would like to strongly oppose the proposal in the draft local plan to develop the site of the former plant nurseries in Grade 2 listed West Ham Park into blocks of flats. This is clearly a valuable "green space" location, so vital to health and wellbeing, and which according to the Local Plan itself, Newham has a shockingly low amount of per capita. The Nursery Site clearly belongs to the historic park (it is not brownfield as some would like to claim) and should remain as an open space for community/recreational use. [Originally submitted in response to H1]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-028/001	Resident	Reg18-T-028

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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	This policy approach has now changed. The implementation text for Policy D4.3 has expanded the environmental impact considerations to ensure the impact of tall buildings on watercourses and open spaces are considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of the impact on biodiversity and existing and proposed public open space, including watercourses. Please see the new wording in policy D4.3 and implementation text D4.3.	[Change it] Building high rises on this site would also ruin the panoramic perspective of open sky that West Ham Park's visitors enjoy from wherever they stand in the park. There is an increasing amount of research which confirms the health benefits of having panoramic view of the sky, particularly in improving mental health conditions such as anxiety, stress and depression. [Originally submitted in response to H1]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-028/003	Resident	Reg18-T-028

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	Comment noted. We have provided the Parks team with your comments.	[Change it] [Not enough is made of a historic and beautiful park that, with better management, could become a destination for people from all over London and beyond, improving the reputation of the area] and bringing much needed money into the area. When people visit an area, they spend money given the opportunity to do so.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-028/006	Resident	Reg18-T-028

Comment Response	(including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation						GWS1 Green spaces	Green and Water Spaces	Reg18-T-034/045	Resident	Reg18-T-034

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-T-036	Resident	Reg18-T-036/001	Green and Water Spaces	GWS1 Green spaces						[Change it] The plan acknowledges Newham's low level of publicly accessible green space but aims to maintain the same level when the population increases. This is unambitious, and does nothing towards combating high levels of pollution in the borough and does not add to climate mitigation in the borough.	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-T-037	Resident	Reg18-T-037/002	Green and Water Spaces	GWS1 Green spaces						[Add to it] While Newham needs housing, please don't make this at the expense of existing parkland.	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Add to it] Don't just keep building homes, build lives! What kind of life would the future societies have if all they had were rooms to sleep and work from.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-038/007	Resident	Reg18-T-038

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	[Add to it] While there is a lot of space around Canning Town station, there is hardly any park here.								Reg18-T-043/006	Resident	Reg18-T-043
	[Add to it] I would transform e.g. Limmo Peninsula area into a park where you could walk around, maybe have a picnic, play with you dog, etc.								Reg18-T-043/007	Resident	Reg18-T-043

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	sets out the ambition for a new park at N4.SA4 Limmo which should maximise the provision of new open space, and green infrastructure and green links and the opportunities to increase biodiversity.										
	Comment noted. The policies in the Green and Water chapter of the Local Plan continues to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	West Ham Park is is the main lung of Newham and as such it is very important for humans and other animals. The possibility of seeing Newham park growing and becoming greener is an exciting prospect and the responsible way forward considering the climate emergency we are facing. [Origionally Submitted on Section 1: All about Newham.]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-044/003	Resident	Reg18-T-044

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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-044	Resident	Reg18-T-044/009	Green and Water Spaces	GWS1 Green spaces						[Add to it] and rewild as much as possible.	Comment noted. Whilst the Local Plan does not specifically cite or designate specific re-wilding projects, the policies in this chapter set out to improve the biodiversity of the borough. This approach is evidenced in Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. The Strategy is published alongside the Local Plan Regulation 19 consultation.
Reg18-T-044	Resident	Reg18-T-044/010	Green and Water Spaces	GWS1 Green spaces						[Add to it] Create roof gardens...	Comment noted. Policy GWS1 continues to support the delivery of 'living building' elements such as roof gardens.
Reg18-T-045	Resident	Reg18-T-045/001	Green and Water Spaces	GWS1 Green spaces						[Add to it] I still see trees pollarded to the trunk. Trees can't shade or absorb pollution without branches and foliage. Birds can't nest. Stop contractors getting this work. It's destroying biodiversity.	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made. We have provided the Parks team with your comments regarding the pollarding of trees.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	I think the planned developments should not go ahead as new housing to generate money for developers but rather as a chance to improve and extent the green space available to the existing community. there is very little green open spaces for Newham residents as it is and there are so much potential for a site like this to really serve the community. The area is densely populated already [Origionally Submitted on Section 1: All about Newham.]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-046/002	Resident	Reg18-T-046

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Policy GWS1 and GWS5 both support the use of green space for exercise and recreation. Policy GWS5, in particular, seeks the favourable location of play and informal recreation facilities away from busy roads or other high pollution areas.	Newham residents, due to the busy roads, are exposed to higher particulate pollution than any other London Borough. The residents need all the space in the Park to exercise and to encourage a healthier lifestyle, it should not be built on. [Originally Submitted on Section 1: All about Newham.]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-048/003	Resident	Reg18-T-048

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Change it] Newham should not consider selling Green Space. [comment originally: CF4 Education and childcare facilities]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-048/011	Resident	Reg18-T-048

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation									Resident	Reg18-T-050

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-051	Resident	Reg18-T-051/005	Green and Water Spaces	GWS1 Green spaces						[Change it] Do not reduce green spaces! [comment originally: CF3 Cultural and leisure facilities]	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.
Reg18-T-051	Resident	Reg18-T-051/006	Green and Water Spaces	GWS1 Green spaces						[Change it] Do not build any housing on westham.park	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in

Comment Response	2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	[Add to it] I am pleased that Newham is developing a local plan for growth and regeneration to include the improvement of air quality		4.f			GWS1 Green spaces	Green and Water Spaces	Reg18-T-053/001	Resident	Reg18-T-053

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-053	Resident	Reg18-T-053/002	Green and Water Spaces	GWS1 Green spaces						[Add to it] I am pleased that Newham is developing a local plan for growth and regeneration to include [the improvement of air quality] and to green the Borough. Green Space and children's play areas in Newham are at present below the needs of the people in our Borough. An increase in the population, as is expected, will require an increase in parkland and open spaces.	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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	Support noted.	[Keep it]					GWS1 Green spaces	Green and Water Spaces	Reg18-T- 055/001	Resident	Reg18-T- 055

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-056	Resident	Reg18-T-056/002	Green and Water Spaces	GWS1 Green spaces						[Change it] At the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. The Newham population is expected to increase by 2038 by c.100,000 people and so there is the requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. However, as you may be aware there are currently plans by the Corporation of London to sell and develop a portion (the "Nursery Site") of the Grade 2 listed West Ham Park to build blocks of flats. As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less. Therefore, we need the local plan to properly protect our local parks. Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland. My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] E					GWS1 Green spaces	Green and Water Spaces	Reg18-T-057/038	Resident	Reg18-T-057
	Support noted.	buildings in Newham can have greenery at the top of the building such as trees, and plants and follow the Singapore motto,					GWS1 Green spaces	Green and Water Spaces	Reg18-T-058/023	Resident	Reg18-T-058

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-069/001	Resident	Reg18-T-069

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	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not						GWS1 Green spaces	Green and Water Spaces	Reg18-T-069/002	Resident	Reg18-T-069

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	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space,	[Add to it] Make more agreeable footpaths to join different areas and many will enjoy these too - lined with plants and flowers. [originally GWS5]					GWS1 Green spaces	Green and Water Spaces	Reg18-T-069/022	Resident	Reg18-T-069

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	Comment noted. The Polices Map which accompanies the Regulation 19 consultation has been updated in light of the completed Green and Water Infrastructure Strategy (2024). Please see the Polices Map for green space designations.	[Add to it] It would be useful to see a plan with ALL the green spaces and water ways in Newham.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-071/006	Resident	Reg18-T-071

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	Support noted.	[Keep it] I'm glad to see this in the plan and just want to encourage moves towards accessibility - especially in the East of the Borough/along the River Roding.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-073/002	Resident	Reg18-T-073
	Comment noted.	[Change it] My comments are from a long time resident of Upton Lane, opposite West Ham park, a daily user of the park, and a member of the Friends of the park.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-075/001	Resident	Reg18-T-075
	Support noted.	[Add to it] I agree with the policies outlined in the document					GWS1 Green spaces	Green and Water Spaces	Reg18-T-076/001	Resident	Reg18-T-076

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-T-083	Resident	Reg18-T-083/003	Green and Water Spaces	GWS1 Green spaces					[Change it] A City of London press release is as follows “Proposals to transform a vacant plant nursery adjoining West Ham Park, which would create additional parkland and facilities as well as providing new homes, have taken a step forward. The plant nursery at West Ham Park closed in 2016 and the glasshouses have been unused for nearly five years. West Ham Park, a charity of which the City of London Corporation is the trustee, is now exploring the option of redeveloping this brownfield site. “ As the site is within the Park it is not a brownfield site. The National Planning Policy Framework excludes “land in built-up areas such as residential gardens, parks, recreation grounds and allotments” from being defined as a brownfield site. The Framework also says local authorities should maintain brownfield registers of land suitable for housing and Newham Council’s register does not include the proposed development site. Unfortunately, unless the outline of the Park in the Local Policies Plan is corrected to include the wrongly omitted area within GS92, then the Council will probably be in the position, as a result of clause H1 Meeting Housing Needs 1c of the local plan, of	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough’s green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	

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Comment	supporting residential development within a park. In my opinion all this land would be far better returned to public use now that the Corporation no longer needs it for its greenhouses.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add to it] The nursery area of West Ham park which has remained dormant for a few years should be reestablished as public open space, as it was in the beginning I understand. It should under no circumstances be used for housing. You say the borough needs more open green public spaces and this is a simple solution to add a large area to an established park that has existing provisions to maintain it in excellent order at no cost to the council. The latter being a bonus for the council in these hard times.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-094/002	Resident	Reg18-T-094

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-095/001	Resident	Reg18-T-095

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	The Green and Water Infrastructure Strategy (2024) has assessed the quality of Newham's Parks. Of the 39 parks assessed for quality, only one was assessed as being of 'Excellent' standard (the QEII Olympic Park). 16 sites were assessed as being of 'Good' quality and 19 were assessed as being of 'Fair' condition'. Only 2 sites were assessed as being of 'Poor' quality (Star Park and Valetta Grove Open Space). Both of these sites are in	[Add to it] Please improve parks,					GWS1 Green spaces	Green and Water Spaces	Reg18-T-098/015	Resident	Reg18-T-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	the western half of the Borough and sites of 'Fair' quality is also mainly found in this area of the Borough. The accompanying Action Plan to the G&W Strategy seeks to deliver improvements to the borough's existing parks.										
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our	[Add to it] planting along streets;					GWS1 Green spaces	Green and Water Spaces	Reg18-T-098/016	Resident	Reg18-T-098

Comment Response	communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation	[Add to it] also invest in and promote Greenway					GWS1 Green spaces	Green and Water Spaces	Reg18-T-098/017	Resident	Reg18-T-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.	[Change it] More green spaces needed					GWS1 Green spaces	Green and Water Spaces	Reg18-T-103/025	Resident	Reg18-T-103

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-105	Resident	Reg18-T-105/023	Green and Water Spaces	GWS1 Green spaces						[Keep it]	Support noted.
Reg18-T-106	Resident	Reg18-T-106/003	Green and Water Spaces	GWS1 Green spaces						[Add to it] There should be a provision to at least maintain what is currently green space in the borough, or if a development is made on green space, it should be at least replaced in the vicinity	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.
Reg18-T-108	Resident	Reg18-T-108/011	Green and Water Spaces	GWS1 Green spaces						[Add to it] It is important to cover every thing that you may not be doing	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.										
	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.	[Add to it] Newham streets need 1000s more trees on residents streets					GWS1 Green spaces	Green and Water Spaces	Reg18-T-109/045	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. This evidence has informed the latest requirements for green space set out in the Local Plan's Site Allocations. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing.	[Change it] The policy protects existing open spaces and sets requirements for new development to provide open space. In many part of the borough, for instance green street and east ham, there is poor access to open space (as defined by GLA's 10 minute walk map) and few development sites to address this acute need. Moreover, these areas have high population densities and overcrowding. As such the plan should identify sites that could address this spatial deficiency. Without doing this the plan does not meet the need to existing or future residents. It is not appropriate to rely on large development sites to address deficiency given these large development sites are located in the east and south of the borough.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-115/004	Resident	Reg18-T-115

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach	[Add to it] Some parks seem scary to walk around even during the day like for example a small one next to Edith Kerrison primary school.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-116/003	Resident	Reg18-T-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 does require new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a	[Add to it] [Some parks seem scary to walk around even during the day like for example a small one next to Edith Kerrison primary school.] Especially such parks need to be looked after more regularly- to clean the rubbish and cut and clean small trees to clear the path.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-116/004	Resident	Reg18-T-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 does require new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.	[Add to it] Maintain walking track in this park regularly.			Which park?		GWS1 Green spaces	Green and Water Spaces	Reg18-T-123/003	Resident	Reg18-T-123
	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Add to it] provide café in Little Ilford park,					GWS1 Green spaces	Green and Water Spaces	Reg18-T-123/006	Resident	Reg18-T-123

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. The Local Plan cannot deliver the change you have requested. However, it should be noted that Policy GWS1 does require new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured. We have also provided the Parks team with your comments.	maintain , [clean parks area, monitor, clear dogs excrement] in Little Ilford park regularly.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-123/008	Resident	Reg18-T-123

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	With regards to cleanliness, the Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.	[maintain] , clean parks area, [monitor, clear dogs excrement] in Little Ilford park regularly.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-123/009	Resident	Reg18-T-123

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-123	Resident	Reg18-T-123/010	Green and Water Spaces	GWS1 Green spaces						[maintain , clean parks area,] monitor, [clear dogs excrement] in Little Ilford park regularly.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 does require new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.
Reg18-T-123	Resident	Reg18-T-123/011	Green and Water Spaces	GWS1 Green spaces						[maintain , clean parks area, monitor,] clear dogs excrement in Little Ilford park regularly.	With regards to cleanliness, the Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.										
		[Keep it]						Green and Water Spaces	Reg18-T-126/020	Resident	Reg18-T-126
	This policy approach has not been changed. As drafted, the Regulation 19 Green and Water Space policies would not prohibit the use of this site for a substation should certain policy criteria be met. The need for this site to be the location of a substation would be assessed at the point an application is brought forward.	The site identified, known as Gallions 4, is located in close proximity but just outside of the N1.SA1 boundary. The site is a strip of land running north/south between the A1020 (Royal Docks Road) dual carriageway to the west, and high-level Docklands Light Railway (DLR) viaduct track to the east. This is currently designated as open space but is the most appropriate piece of vacant land available to meet the		Designation at Gallions 4				Green and Water Spaces	Reg18-E-092/048	Royal Docks	Reg18-E-092

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		substations development requirements. The open space designation is not supported in this context.									
	This policy approach has not been changed. As drafted, the Regulation 19 Green and Water Space policies would not prohibit the use of this site for a development should certain policy criteria be met. The need for this site to be the location for development would be assessed at the point an application is brought forward.	Additional to the above, open space designations have been significantly increased around Royal Albert DLR, Compressor House and Newham's Council offices. This increase is resisted, and clarity is requested as to the purpose of the allocation and consideration of impact this could have on future development proposals, including those consented in outline at RAD (14/00618/OUT). Any open space should be masterplan led rather than arbitrarily allocated without a development context.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-092/066	Royal Docks	Reg18-E-092
	A change to this policy approach has not been made. We did not consider this change to be necessary as the green space designations have been informed by the now completed Green and Water Infrastructure Strategy (2024). In addition, the Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should	Whilst we appreciate that valuable green and open space should be protected, this space [GS214 under existing designation] has demonstrably no value, other than a historic shading on a plan. Our view then was that the green space designation was unjustified and should be removed. However, we note that the designation is maintained in the Regulation 18 document and our detailed comments					GWS1 Green spaces	Green and Water Spaces	Reg18-E-110/003	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.	on this point are set out below under Policy GWS1.									
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we are using the London Plan (2021) definition of green space and clarifies that these spaces are considered green space whether or not they are accessible to the public but it does exclude private residential gardens. It should also be noted that we also use the London Plan definition of open space which is: all land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted. Whilst the policy approach has not changed, the Green and Water chapter in the Local Plan and the glossary have been updated to more clearly reflect the use and application of the London Plan definition.	In the adopted Local Plan, the parcel of land to the west of the Sainsbury's store was included as part of the green space designation (GS214). Green space GS214 was identified as 'amenity/woodland' that is publicly accessible. This was factually wrong, but the emerging Local Plan carries this designation over as part of policy GSW1 and it is identified on the interactive Policies Map as 'Sainsbury's Open Land' (see Figure 1). This land is not publicly accessible, nor is it amenity/woodland. It is scrubland with very low biodiversity value and has no amenity or ecological value. The open space is not 'high quality', nor does it contribute to the accessibility of open space for current or future residents of Newham, as set out in Policy GWS1.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-110/027	Sainsbury's Supermarkets Ltd	Reg18-E-110

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/028	Green and Water Spaces	GWS1 Green spaces						Even though it has no amenity value, the evidence base shows that the site is “amenity green space”. In the justification to Policy GWS1 (paragraph 3.170), it is noted that Beckton is “relatively well served with publicly accessible green space, with a rate 2.23 hectares per 1,000 residents, significantly above the Borough average (0.71 hectares per 1,000 residents)”. This demonstrates that Beckton is not an area deficient in open space and it is unnecessary for Policy GWS1 to designate sites that clearly does not serve any public benefit or have any amenity or biodiversity value such as the ‘Sainsbury’s Open Land’ adjacent to the Beckton superstore.	A change to this policy approach has not been made. We did not consider this change to be appropriate as over the Plan period, Newham’s population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space. This approach has been informed by Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy is based on comprehensive information on Newham's green and water spaces gathered from a variety of sources and using different methodologies. Over a period of 12 months this has included a policy and contextual information review, baseline mapping through desktop research, reviews of existing	Elsewhere, it appears that the Council have taken a view on other areas of 'green space' and excluded them from the designation in the draft Local Plan. For example, parcel GS224 (Local Plan, 2018) sat to the southwest of the Sainsbury's superstore and directly linked to the green corridor to the south. GS224 is not designated in the Regulation 18 version of the Plan and there appears to be no justification why. On the face of it GS224 is closer to the green corridor and is a green area with vegetative cover. There is also a pond, which presumably would have a greater ecological value than an area of scrub such as that adjacent to the superstore. There does not seem to be any consistency in how the Council have approached the designation of 'green space'.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-110/029	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	datasets and on-site surveys; bespoke assessments of various typologies and aspects of Newham's G&W spaces; engagement with Newham Council Officers (across numerous departments) and workshops and interviews with wider community stakeholders and residents.
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		Furthermore, the proposed definition of 'Open Space' in the emerging Local Plan goes beyond the NPPF (2021) definition of Open Space. The emerging Plan defines open space as: <i>"All land in Newham that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within Newham, whether in public or private ownership and whether public access is unrestricted, limited or restricted. This includes all open areas consisting of: major parks, local parks, playing fields (including playing pitches), allotments, community gardens and burial grounds, whether or not they are accessible to the public".</i> The NPPF definition of open space is: <i>"All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity"</i> The NPPF is clear that open space is land of "public value" which is important for "sport and recreation" and can act as "visual amenity". The proposed definition in the Newham Local Plan Review document goes far beyond any reasonable interpretation of open space. It would apply to					GWS1 Green spaces	Green and Water Spaces	Reg18-E-110/030	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	
Comment	landscape areas, vacant plots and almost anything that is not built upon as the only proposed criterion set out is that the land should be “predominantly undeveloped”. This is clearly too restrictive, and we would urge the Council to reconsider their approach to defining and designating open space in the Borough. The defining characteristic of open space that needs to be safeguarded should be that the land has public value.
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Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/031	Green and Water Spaces	GWS1 Green spaces						The current position will stymie development on appropriate sites and prevent businesses from investing in the Borough. The recent consultation on reforms to national planning policy reiterate national government's intention to focus development on the 20 largest towns and cities in England, including London. The Council's approach of designating brownfield land as 'open space' will increase development pressure elsewhere (including on greenfield sites) and does not make best use of urban land. This is contrary to the national ambition to deliver an urban uplift.	A change to this policy approach has not been made. We did not consider this change to be necessary as the green space designations have been informed by the now completed Green and Water Infrastructure Strategy (2024). In addition, the Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/032	Green and Water Spaces	GWS1 Green spaces						[see plan on pg7 of submission] Given the economic headwinds the county is facing, this is an overly prohibitive approach which should be reconsidered. We request that the 'Sainsbury's Open Land' designation is removed in the next iteration of the Local Plan. The removal of the 'Sainsbury's Open Land' designation would not affect the strategic green corridor to the south of the Sainsbury's site, nor would it degrade the green network or habitat links in the area. An ecological assessment carried out on the site in April 2022 demonstrated that the site is of very limited ecological value and has no habitats of significance.	A change to this policy approach has not been made. We did not consider this change to be appropriate as over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space.

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	The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.	The land forms part of the supermarket development site and historically has benefitted from planning permission for an extension to the supermarket (Ref: P/96/0255; 04/0119 and P/00/0347).									
	Support noted.	Sport England supports the protection (1. a.) stances of this stances of this policy as this aligns with Sport England's Planning Policy.		1a			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/036	Sport England	Reg18-E-118
	Support noted.	Sport England supports the enhancement (1.c.) stances of this stances of this policy as this aligns with Sport England's Planning Policy.		1c			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/037	Sport England	Reg18-E-118
	Support noted.	Sport England supports the new provision (1.e) stances of this stances of this policy as this aligns with Sport England's Planning Policy.		1e			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/038	Sport England	Reg18-E-118
	This wording change has been made, please see Policy GWS1.	[1.e] Although the stance should align with strategically identified needs and should also relate to playing field, not just playing pitches, and, in terms of locations, this should be informed by the emerging strategies.		1e			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/039	Sport England	Reg18-E-118

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	Support noted.	In relation to 1.d, Sport England welcomes that development next to green space should not negatively impact its function, quality and accessibility, especially in relation to evening use and ball strike.		1d			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/040	Sport England	Reg18-E-118
	Support noted. However, this policy approach has now changed due to the need to ensure we are being clearer about the protection afforded to playing fields. Please see the new wording in Policy GWS1.2	GWS1 2. indicates that the loss of playing field would be replaced with playing field of equivalent quality and quantity and locally and it appears that the policy allows ancillary sport facilities on green spaces. This not only would ensure there is no net loss of playing field sites but would also allow the ancillary facilities needed to support meaningful use of sites.		2			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/041	Sport England	Reg18-E-118
	This wording change has been made. Please see the new wording in Policy GWS1 which now includes reference to the Playing Pitch Strategy (2024) and the need to consider if new playing field provision is required.	In relation to GWS1 4., Sport England would like to see new playing field specifically included in this list so that new development can consider new provision, this is on the basis that the emerging Playing Pitch Strategy indicates new provision is required.		4			GWS1 Green spaces	Green and Water Spaces	Reg18-E-118/042	Sport England	Reg18-E-118
	Support noted.	The Berkeley Group is keen to support Newham in ensuring development provides or helps to deliver easy access to a network of high-quality green spaces and their sites at Bromley by Bow, Twelvvetrees Park, Beckton, East Ham and Rick Roberts Way gasworks all represent significant opportunities to do so particularly on the basis that all of their sites are currently and have been for many years inaccessible to the public.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/131	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	Comment noted.	The pandemic restrictions have further highlighted the importance on the quality of homes and their surrounding green spaces, ensuring that they are sustainable, inclusive to all and accessible. The Berkeley Group's vision includes the adoption of a landscape-led approach to development, where a 'first life, then spaces, then buildings' approach plays a crucial role in the design and landscape quality. The redevelopment and opening up of these sites through development in line with their respective site allocations will enable connectivity with already existing open space as well as the provision of new open space in the borough. This will be a huge public benefit.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/132	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this wording change to be appropriate as this policy outlines all of the ways development will ensure access to green space. Individual developments will be assessed against those parts of relevance to the proposed scheme. The policy is clear that part 1b of the policy applies solely to Metropolitan Open Land (MOL) and any changes to MOL will be assessed in line with national and regional policy, recognising its special and distinct characteristics. Policy part 1a and associated policy on loss (formally part 2 and now part 3) therefore, expressly does not apply to MOL.	In relation to Part 1 (b), which requires the open character of Metropolitan Open Land (MOL) to be maintained, please refer to our comments on site allocation N13.SA3 Former East Ham Gasworks which provides an assessment of the Former East Ham Gasworks against MOL criteria and concludes that it doesn't meet all of the tests. Proposed policy wording: a. protecting existing open space to ensure there is no net loss, except where it meets the criteria set out in part 2 below; ~~and~~ <u>or</u> b. maintaining the open character of		1b			GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/133	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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		Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy; and									
	A change to this policy approach has not been made. We did not consider this change to be necessary, please see the Newham's MOL Review 2024, published in conjunction with the Regulation 19 Local Plan consultation.	The exceptional circumstances outlined within part 2 of this policy should not exclude MOL and MOL should be subject to the same tests in line with national planning policy which enables very special circumstances to be demonstrated for development within the Green Belt or MOL. Proposed policy wording: 2. Developments on open space ~~(excluding Metropolitan Open Land)~~ will only be supported in exceptional circumstances where:		2			GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/134	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership, it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.	The Berkeley Group notes the requirement at part 5 of this policy for new open space on site allocations or space that functions as a local park to be transferred into the Council's ownership and that a commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. The text goes on to state that where it is agreed that the open space will not be adopted, a Management Plan will be required. The Berkeley Group requests that the wording here is updated to instead note that there are two options available for the management of new open space rather than the presumption being that new open space will automatically transfer to Council ownership. Policy wording: 5. <u>Where new open space is incorporated into site allocations or space which will function as a local park, the following options are available for the management of the new open space:</u> a. ~~It is expected that new open space on site allocations or space which will function as a local park will to be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-year, will be secured through a legal agreement.~~ <u>Or</u> <u>b.</u> Where it is agreed that the publically					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/135	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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		accessible open space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and implemented through a legal agreement.									
	This wording change has been made, please see Policy GWS1.	Management Plans should also not be restricted to being secured through a legal agreement and in some instances it may be appropriate to secure such a plan via planning condition.		5			GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	[East Ham Gasworks] Summary of Proposed Amendments: De-designation of MOL (whole or in part)					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/311	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	[East Ham Gasworks] Summary of Proposed Amendments: Removal of open space GSW1 East Ham Sports Ground					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/312	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	Comment noted.	The former East Ham Gasworks comprises a gas holder and associated gas operational equipment located on previously developed land accessed off Leigh Road along the eastern edge of the Borough located within a wider setting of Metropolitan Open Land ('MOL'). The gas holder is a tall building (approximately 52m AOD in height) for the purposes of local plan and London Plan1.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/321	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider	There are multiple gas easements and Thames Water structures which cross the site, some of which are underground, as illustrated at Figure 1 below. The site is not permeable, is not, nor has it been, publicly accessible. It is anticipated that remediation works would be required to open up the site for public access. This would require the removal of the top layer of soil from the site [See Figure 1]					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/322	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.										
	Comment noted.	The adopted local plan identifies the principal areas of previously developed land, and the MOL classification (GS82), replicated below at Figure 2 [See Figure 2]					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/323	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Comment noted.	The adopted site allocation broadly reflects the previously developed land at the surface (2.04ha), albeit there are numerous below ground structures as denoted at Figure 1 [See Figure 3]					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/324	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.	London Plan ('LP') Policy G3 affords MOL the same status and level of protection as Green Belt. It is therefore subject to national policies on proposals affecting the Green Belt at paragraph 147 to 151 of the Framework. LP Policy G3 confirms that boroughs should designate MOL by establishing that the land meets one of the following criteria: 1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area. 2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. 3. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. 4. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. When these criteria are applied to the former Gasworks site, we conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:- The land is not clearly distinguishable from the built-up area owing to the scale and proximity of the gasholder (a tall building) located geographically within the centre of the site. The site is					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/325	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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Comment	enclosed on all sides by residential development, railway infrastructure and, to the east the elevated A406 North Circular Road. Both the railway and the north circular dissects the site from further MOL to the north. An electricity pylon is located along the eastern edge alongside the A406. Cumulatively these features detract from an open space setting and contribute to the sense of a built-up area.
Implementation	
Justification	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	When these criteria are applied to the former Gasworks site, we conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:- The site is closed to the public and is inaccessible and impermeable. It does not include open air facilities for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/326	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	When these criteria are applied to the former Gasworks site, we conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:- The site does not contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/327	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	When these criteria are applied to the former Gasworks site, we conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:- There is green space allocated to the north and south, but these are dissected by the Overground, District Line and Hammersmith and City Lines and Watson Avenue. Whilst on plan, the site appears to link through to other parcels and green corridors in reality these parcels and corridors are separated by significant physical infrastructure. None of criterion 1-3 are addressed.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/328	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	Policy G3 part (c) allows for alterations to the boundary of MOL, in consultation with the Mayor of London, and adjoining boroughs. These changes should be undertaken in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL. When taking into account the purposes for including land in MOL, we consider that there is a clear opportunity to review the MOL boundaries at this site to unlock the wider site for a design led development incorporating new publicly accessible open space facilities.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/329	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	We understand from the Newham Green and Water Spaces Strategy Interim Report (October 2022) that the Council has yet to conclude its review of the MOL designations across the Borough. "A review of current Green Belt and Metropolitan Open Land site designations across Newham is being developed. This will include a consideration of additional designations to protect strategically important greenspace. The review will be included in the final Green Infrastructure Strategy and will be considered as part of the Regulation 19 process" (page 2). The review will inform the next stage of the Local Plan and we therefore welcome the opportunity to work with the Council to inform this review.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/330	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.						GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/331	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	[East Ham Gasworks] We suggest an amendment to the MOL allocation and the GSW1 East Ham Sports Ground by designation. The site does not meet the tests of MOL and the previously developed land does not constitute open space. Emerging Policy GWS1: Green spaces protects existing open space to ensure there is no net loss, except where it meets the criteria in part 2 which supports development in exceptional circumstances. We consider that it would not be appropriate to allocate, and require open space reprovion, on land not used as open space, and particularly land that is previously developed.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/333	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	In weighing the balance of opportunities, public benefits and exceptional circumstances that support an alternative approach to MOL boundaries at N13.SA3 Former East Ham Gasworks, we set out below three scenarios for the site. Do nothing scenario – the Site comprises an impermeable contaminated former gasworks site, with operational gas equipment. It does not meet the LP Policy G3 criteria for MOL designation, does not comprise publicly accessible open space and does not currently afford the local community any public benefit. To change this scenario it is necessary to deliver enabling development on site to fund remediation and deliver wider public benefits.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/348	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/349	Green and Water Spaces	GWS1 Green spaces						[In weighing the balance of opportunities, public benefits and exceptional circumstances that support an alternative approach to MOL boundaries at N13.SA3 Former East Ham Gasworks, we set out below three scenarios for the site] Regulation 18 Policy Scenario – Development of 3 to 6 storeys on the undesignated ‘white’ land proposed in the Regulation 18 Plan will not deliver the aims and objectives of N13.SA3 Former East Ham Gasworks. The abnormal costs of bringing forward a gasworks site for residential development are substantial, as would be enhancing the quality and range of uses of MOL in accordance with Policy G3, in addition to opening up the site for public use and benefit which would require significant remediation. In its current form the wording of N13.SA3 would deliver around 300 new homes (at 3 to 6 storeys) which may give rise to challenges of deliverability taking into account other policies of the local plan, including the delivery of affordable housing.	This policy approach has now changed due to evidence from the desktop review of Newham’s MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham’s strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham’s MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	[In weighing the balance of opportunities, public benefits and exceptional circumstances that support an alternative approach to MOL boundaries at N13.SA3 Former East Ham Gasworks, we set out below three scenarios for the site] To achieve the objectives of the Plan as a whole, and to support enhanced quality and range of uses of MOL, de-designation of the MOL (or part of it) for enabling development would generate significant public benefits including the remediation of the whole site for public benefit, enabling it to be opened up or public access. Development, for example, across the southern half, could facilitate MOL improvements to the northern half and the delivery of c.700 homes.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/350	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	We set out below important material considerations which inform the alternative policy approach to the site. London Plan – Policy H1 of the London Plan designates surplus utility sites as a strategic source of housing supply in London. Strategic undersupply of homes in London – The London Plan is not able to meet the objectively assessed need for housing in London of 66,000 homes per annum and is currently in deficit for both market housing and affordable homes. Local undersupply of homes in Newham – To assist the Council in meeting the objectively assessed need for housing locally and to address current deficits for both market housing and affordable homes (and the shortfall of 15,721 homes) the site would be able to make a significant contribution. Using brownfield land for homes – Paragraph 120 of the Framework gives substantial weight to the value of using suitable brownfield land within settlements for homes. The previously developed land on site, and its curtilage, is significant and can contribute to housing supply. Using brownfield land for homes – Paragraph 120 of the Framework gives substantial weight to opportunities to remediate despoiled, degraded,					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/351	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	
Comment	derelict and contaminated land. This abnormal and onerous extent of gas sites is significant and recognised by the London Plan. Proposed housing - High quality new homes would contribute towards the Borough's increased annual housing target in the London Plan; and its plan to deliver additional homes to meet its minimum housing needs.
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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/352	Green and Water Spaces	GWS1 Green spaces						[We set out below important material considerations which inform the alternative policy approach to the site] Building beautiful – The proposed replacement of the existing gasholder frame, of no aesthetic or heritage value, with high quality buildings that respect the residential character and appearance of the area whilst respecting the industrial spirit of the previous use in a more appropriate form would enhance the character and appearance of the area. Public access and permeability – The site has been inaccessible for decades and forms an impermeable barrier between various communities. This situation is exacerbated by the existing road network. The opening up of the site to the public to create a direct, overlooked, and visually permeable open space for walking, cycling (and sport) is a significant public benefit. MOL function – Proposals to enhance access to the MOL and improve the poor quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL including improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage in accordance with London Plan paragraph 8.3.4 would be a public benefit. Economic – This development will generate improved economic productivity as a result of job creation; resident local net expenditure; council tax; new homes bonus and CIL. The Berkeley Group invest in construction jobs and the delivery of a Local	This policy approach has now changed due to evidence from the desktop review of Newham’s MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham’s strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham’s MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.

										Employment and Skills Plan that offers training and apprenticeship opportunities to local young people during the construction. Social benefits – The development will support a strong, vibrant and healthy community, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health and social well-being. Improvements to social value to the local community will implement Berkeley's unique Social Sustainability Assessment. Hazardous Substances Consent – Redevelopment of the site will lead to the revocation of the existing hazardous substances consent. This will reduce the extent to which there might be a public health hazard arising from this site.	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	Individually and cumulatively, these material considerations are a benefit of redevelopment at N13.SA3, and could only be delivered in the alternative policy scenario.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/353	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to additional edits, not suggested here, to ensure the policy clauses flow in a natural order. Please see the new wording in GWS1. The change you have suggested has not been made as we did not consider this change to be necessary in light of the additional work on the order of this policy.	Please note that we recommend amending the order of the points to the following: • Point 6 • Point 4 • Point 5 • Point 3 • Point 7 • Point 2					GWS1 Green spaces	Green and Water Spaces	Reg18-E-136/380	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change] DO NOT BUILD ON GREENSPACE IN WEST HAM PARK					GWS1 Green spaces	Green and Water Spaces	Reg18-As-001/032	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change] Ensure consistency with local plans in terms of green open space - conflicts with West Ham Park development					GWS1 Green spaces	Green and Water Spaces	Reg18-As-001/047	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add] Site allocation - open space West Ham Park (including all park area)					GWS1 Green spaces	Green and Water Spaces	Reg18-As-001/050	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	[Keep it] Greenery space provide to neighborhood					GWS1 Green spaces	Green and Water Spaces	Reg18-T-063/010	Student	Reg18-T-063

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place. This would not preclude a future planning application from being approved on MOL, were a scheme to meet the very special circumstances as set out in the NPPF (2023).	In relation to the current Local Plan, we supported the deletion of the MOL designation on the site and security centre at Beckton STW.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/021	Thames Water	Reg18-E-028

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place. This would not preclude a future planning application from being approved on MOL, were a scheme to meet the very special circumstances as set out in the NPPF (2023).	However, as previously promoted, we consider it is important that MOL is removed from the whole of the Northern Lagoon area at Beckton STW. The Northern Lagoon area (previously known as GS178) constitutes operational land associated with Beckton STW as defined in the Town and Country Planning Act and as confirmed by the Section 106 Legal Agreement between Thames Water and the London Borough of Newham associated with Beckton STW extension/Lee Tunnel planning permission reference 10/02061/LTGVAR/LBNM (March 2011). The S106 Agreement states in Schedule 2, Section 4.2.6 that: <i>"and shall be prepared recognising and acknowledging that the Northern Lagoon is Operational Land that may need to be utilised in the future by Thames Water at its discretion for the purposes of meeting and discharging its statutory undertaking and duties."</i> And at Section 4.4 that: <i>"Thames Water shall maintain the Northern Lagoon until needed for development further to Thames Water's duty as a statutory sewerage undertaker and having reasonable regard to the status of Operational Land in accordance with the terms of the Landscape and Ecology Masterplan approved further to paragraph 3.1...."</i> . Thames Water					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/022	Thames Water	Reg18-E-028

Comment Response	
Comment	object to the designation of the Northern Lagoon area at Beckton STW as MOL and Green Space as it is the last key area of currently unused operational land that is available for future upgrades.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.	The site [Northern Lagoon area at Beckton STW] is largely currently unused land associated with Beckton STW. There is no public access to this area (other than the new permissive footpath along the northern boundary of Thames Water's landholdings and outside of the operational site fencing) and it has no amenity function. It is therefore considered that the site does not meet the purposes of Green Space and is not one of the types of green space to which protection should be applied i.e. Metropolitan Park, District Park, Local Park and Open Space, Small Open Space, Pocket Park and Linear Open Space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/023	Thames Water	Reg18-E-028

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.	It is considered that there are exceptional circumstances to remove the northern lagoon site from MOL and Green Space designations in association with the current Local Plan review. As previously indicated, the remainder of Beckton Sewage Treatment Works (STW) has been similarly removed from MOL as part of the previous Core Strategy/Newham Local Plan Review and parts of operational/built up Crossness STW are being removed from MOL in the current Bexley Local Plan Review. Policy G3 of the London Plan sets out that <i>"...C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B."</i> It is therefore important that this opportunity to designate the northern lagoon site through the current Local Plan review is not missed as a future Local Plan review may be too late. Thames Water and the other water companies, plan for infrastructure in 5 year periods know as Asset Management Plans (AMP). We are currently in AMP7 (the 7th since privatisation) which runs					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/025	Thames Water	Reg18-E-028

Comment Response	
Comment	from 1st April 2020 to 31st March 2025. AMP 8 will run from 1st April 2025 to 31st March 2030 and the draft Business Plans will be submitted to Ofwat in 2024 as part of the Price Review (PR24). Therefore, the AMP period process does not match up with the Local Plan Review process and it is important that the current opportunity to remove the site from MOL is not missed.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.	It is considered that the MOL designation at the Thames Water Northern Lagoon are at Beckton STW does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and land at Crossness STW: 1) The site is not distinguishable from the built-up area. The site forms part of operational Beckton STW site.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/026	Thames Water	Reg18-E-028

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/027	Green and Water Spaces	GWS1 Green spaces						It is considered that the MOL designation at the Thames Water Northern Lagoon are at Beckton STW does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and land at Crossness STW: 2) There is no public access to the Thames Water operational land for health and safety and security reasons (other than the new permissive footpath along the northern boundary of Thames Water's landholdings and outside of the operational site fencing). The site does not include any open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.
Reg18-E-028	Thames Water	Reg18-E-028/028	Green and Water Spaces	GWS1 Green spaces						It is considered that the MOL designation at the Thames Water Northern Lagoon are at Beckton STW does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and land at Crossness STW: 3) The site is previously developed with sewerage infrastructure and does not contain any	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF,

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.	features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place.	It is considered that the MOL designation at the Thames Water Northern Lagoon are at Beckton STW does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and land at Crossness STW: 4) The site is not green infrastructure as it is retained operational land. Therefore, it does not form part of a strategic corridor, node or a link in the network of green infrastructure and meets none of the above criteria.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/029	Thames Water	Reg18-E-028

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Beckton Sewage Treatment work and therefore the MOL remains in place. This would not preclude a future planning application from being approved on MOL, were a scheme to meet the very special circumstances as set out in the NPPF (2023).	The removal of the MOL designation would facilitate any new operational buildings in the future which would otherwise have to justify very special circumstances. In our experience, such operational development within the MOL/Green Belt can be delayed by having to demonstrate a very special circumstances case. It is therefore considered that exceptional circumstances do exist to remove the northern lagoon area from MOL in accordance with Policy G3, as was the case in relation to the main Beckton STW site and Crossness STW.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-028/030	Thames Water	Reg18-E-028

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/034	Green and Water Spaces	GWS1 Green spaces						Part of Thames Water's Abbey Mills Pumping Station (PS) site is designated as Open Space. Thames Water object to this designation. (see extract from policies map below with red arrow pointing to open space) [see map in letter]. The Abbey Mills PS site is either currently in operational use or retained for future operational use and is of strategic importance to London's existing and future infrastructure requirements. It is important that the site is not constrained by unnecessary restrictions which could prevent future upgrades to this essential sewerage infrastructure.	This policy approach has not been changed. As drafted, the Regulation 19 Green and Water Space policies would not prohibit the use of this site for future upgrades to essential sewerage infrastructure should certain policy criteria be met. The need for this site to be the location for sewage infrastructure would be assessed at the point an application is brought forward.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/089	Green and Water Spaces	GWS1 Green spaces						[Appendix A] The policy is generally supported and in alignment with the proposals for Silvertown.	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/090	Green and Water Spaces	GWS1 Green spaces			5			[Appendix A] The reference in Part 5 to the transfer of open spaces to the Council is queried and it is not considered that this will be necessary with the right agreements in place. Some of the open spaces at Silvertown would suffer from such a model, for example Mills Square which would have a programme of events managed as part of the estate and would therefore benefit from being in the same ownership as Millennium Mills.	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Draft Policy GWS1: Green Spaces TTLP support the Council's aspiration in Draft Policy GWS1 to maximise opportunities to deliver new open space, urban greening and improvements to Newham's green links, and for GLA referable schemes to provide on-site publicly accessible open space.					GWS1 Green spaces	Green and Water Spaces	Reg18-E-080/038	Transport Trading Limited Properties Limited	Reg18-E-080
	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS1 expects new open space which operates as a Local Park to be transferred to the Council's ownership it also stipulates that where this does not happen that, instead, a Management Plan should be secured through a legal agreement (Section 106) or planning condition.	Part 5 of the draft policy states that "it is expected that new open space on site allocations which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a 15 year period will be secured through a legal agreement. Where it is agreed that publicly accessible open space will not be adopted, a Management Plan should be provided". [...] In relation to the ownership and management of proposed open space or Local Parks, Draft Policy GWS1 should provide sufficient flexibility to allow either the developer/landowner to own and maintain the space (in accordance with an agreed Management Plan) or for the Council to adopt the space so that it is transferred into the Council's ownership. This should be determined on a case by case basis and it should		5			GWS1 Green spaces	Green and Water Spaces	Reg18-E-080/039	Transport Trading Limited Properties Limited	Reg18-E-080

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		not be an expectation that all such spaces are transferred to the Council.									
	Support noted.	[Add to it] In general I approve of the plan,					GWS1 Green spaces	Green and Water Spaces	Reg18-T-030/001	Unknown	Reg18-T-030

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-030/002	Unknown	Reg18-T-030

Comment Response		The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.						GWS1 Green spaces	Green and Water Spaces	Reg18-T-030/003	Unknown	Reg18-T-030

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change it] I understand the nurseries in West Ham Park are being considered for housing. Please might u consider using this space as an education centre, where children/young people can understand about growing plants, sustainability, wildlife rather than more concrete, cars, etc.					GWS1 Green spaces	Green and Water Spaces	Reg18-T-016/001	User of West Ham Park	Reg18-T-016

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Unfortunately it was not clear what change or addition [delete as appropriate] you wanted to make to this part of the Plan.	[Change it] I appreciate people need homes					GWS1 Green spaces	Green and Water Spaces	Reg18-T-016/002	User of West Ham Park	Reg18-T-016

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation						GWS1 Green spaces	Green and Water Spaces	Reg18-T-016/003	User of West Ham Park	Reg18-T-016

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-013	Woodland Trust	Reg18-T-013/001	Green and Water Spaces	GWS1 Green spaces						[Add to it] The Woodland Trust supports this policy, in particular sections 1c and 1g on connectivity and integration;	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/002	Green and Water Spaces	GWS1 Green spaces						[Add to it] The Woodland Trust supports this policy, [in particular sections 1c and 1g on connectivity and integration]; and 4d and 4e on supporting biodiversity and climate resilience.	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/003	Green and Water Spaces	GWS1 Green spaces						[Add to it] We suggest adding wording "and contribute to increased tree canopy cover as appropriate", perhaps in section 4d, 4e or a new 4l, in line with policy GWS4.	This wording change has been made. Please see the new wording in GWS1.4e.
Reg18-E-070	Aston Mansfield	Reg18-E-070/094	Green and Water Spaces	GWS2 Water spaces						b. GWS2: Water Spaces - Would you keep, change or add something to this policy? No comment	Unfortunately it was not clear what change you wanted to make to this part of the Plan.
Reg18-E-143	Canal and River Trust	Reg18-E-143/003	Green and Water Spaces	GWS2 Water spaces						We also note that the Lee Navigation, or River Lee Navigation, is not referenced specifically in the draft Local Plan, but is described as the River Lea. Although there are different names, the Lee Navigation is described by the Trust as the section between Bow Locks and continuing up to Hertford, while the Old River Lea is the branch off into the QEOP at Old Ford Lock.	Comment noted.

Reg18-E-143	Canal and River Trust	Reg18-E-143/004	Green and Water Spaces	GWS2 Water spaces						The LLDC Local Plan currently covers the LB Newham area which these waterways fall within, and repetition of some of the LLDC Local Plan's waterways references would be appropriate within the LB Newham draft Local Plan. There are several reference in the LLDC Local Plan to the area's waterways and their benefits, and also the following specific waterway policies: Policy BN.2: Creating distinctive waterway environments The Legacy Corporation will work with its partners to optimise the functions and enhance the local distinctiveness of waterway environments, expecting development proposals that affect the waterway environment to: 1. Improve the ecological potential, drainage and flood resilience capacity of the waterway 2. Support the aims of the Thames River Basin Management Plan 3. Create opportunities for recreational activities along the waterway 4. Introduce recreational, visitor and residential moorings where suitable 5. Support commercial activity 6. Improve access to and along the waterway as appropriate 7. Prevent disruption to the movement of passengers and freight. Cross-reference to policies: S.8; T.10 London Plan policies: 7.24; 7.30" "Policy T.10: Using the waterways for transport The Legacy Corporation will encourage and support the use of the waterways for passenger and freight transport and leisure uses, taking into account any impact on biodiversity and drainage	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces and already covers the points highlighted here from the LLDC Local Plan. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.

										functions. Where appropriate, the Legacy Corporation will require development proposals to provide new or improved access to the waterways, and improvements to towpaths and footpaths, and facilitate the introduction of moorings and other waterway-related infrastructure where these do not compromise the other functions of those waterways. Cross-reference to policies: BN.1; BN.2 London Plan policies: 7.25; 7.26 ."	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to now explicitly make mention of towpaths as suggested. Please see the new wording in Policy GWS3.	GWS2: Water spaces We are pleased to note the various sensible protections and improvements required to be delivered through developments. The improvement of waterside paths and towpaths is also recommended to support growing communities and we would request this be more explicitly described in the policy text, as suggested below: 2.c. protect and where possible improve access points to water spaces, <u>towpaths</u> and walking and cycling routes, wayfinding, and links to the existing transport network;		2.c			GWS2 Water spaces	Green and Water Spaces	Reg18-E-143/011.a	Canal and River Trust	Reg18-E-143
	This policy approach has now changed to state that waterside walkways and cycle paths should be provided where 'appropriate' as suggested. Please see the new wording in Policy GWS3.	GWS2: Water spaces We are pleased to note the various sensible protections and improvements required to be delivered through developments. The improvement of waterside paths and towpaths is also recommended to support growing communities and we would request this be more explicitly described in the policy text, as suggested below: With regard to 2. e. provide suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where possible." We would suggest that "possible" be amended to "appropriate" as some waterways are not suitable for a secondary path, and would not have historically had		2.e			GWS2 Water spaces	Green and Water Spaces	Reg18-E-143/011.b	Canal and River Trust	Reg18-E-143

Comment Response	
Comment	towpaths on both sides. If not designed comprehensively, secondary paths can also become targets for anti-social behaviour, and reduce opportunities for ecological enhancements and secure moorings.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-143	Canal and River Trust	Reg18-E-143/012	Green and Water Spaces	GWS2 Water spaces					GWA2.2	Page 218 At GWS2.2 we note the following statement regarding re-naturalisation of waterways: "River re-naturalisation will be encouraged (see Policy CE7), design measures can include, but are not limited to: • replacing hard engineering alongside and within river channels with soft engineering options where feasible. • reconnecting rivers with their floodplains for flood risk reduction and resilience against climate change as well as habitat enhancement. • de-culverting river channels where possible. Mitigation will be sought for any hard `engineering solutions applied to any river channels to compensate for any loss of habitat (including buffer zones). We would not expect this to be relevant to the hard-edged waterways in this part of the Lower Lea Valley, but would request this be clarified, given the industrial heritage background that required the engineered edges of many of the Bow Back Rivers.	This wording change has been made. Please see the new wording in the implementation text GWS2.2.
Reg18-T-023	Community Group Representative	Reg18-T-023/002	Green and Water Spaces	GWS2 Water spaces						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-107	Community Group Representative	Reg18-T-107/002	Green and Water Spaces	GWS2 Water spaces						[Change it] Stop closing off the dock edge to residents by giving priority to Sunborn and the Good Hotel. The character of the area has been destroyed, the environment impacted, the 'pedestrian' dock edge is a lorry park and the original design intent of the square is completely lost. Shocking way to destroy the beautiful docks and hide from sight.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. The Strategy has informed the relevant Neighbourhood policies (N1, N2, N3 and N4) and the requirement to improve the dock edge to deliver a better, continuous walking and cycling environment. It should also be noted that the Regulation 18 Local Plan and the Regulation 19 Local Plan provide more detail on the dock edge that the current Local Plan.
Reg18-E-145	Environment Agency	Reg18-E-145/099	Green and Water Spaces	GWS2 Water spaces			1			We strongly support Policy GWS2.1	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/100	Green and Water Spaces	GWS2 Water spaces			GWS2.1.b			are very pleased to see that the Thames Estuary 2100 Plan, RD&BR Integrated Water Management Strategy, Riverside Strategy and the relevant marine plan are all reference under Policy GWS2.1.b.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/101	Green and Water Spaces	GWS2 Water spaces						We are also very pleased to see reference to supporting the requirements and objectives of the Water Framework Directive (WFD) and Thames River Basin Management Plans (TRBMP).	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/102	Green and Water Spaces	GWS2 Water spaces					GWS2.1 We note the clarification that all in land water bodies are protected under the WFD, not just main rivers (implementation section GWS2.1.) The WFD mandates no deterioration to the water environment, and consequently development must put appropriate measures in place to prevent deterioration. Whilst this policy does require development to protect and, where possible, enhance water spaces, there is scope to require developers to demonstrate how they can be compliant with WFD objectives and/or how they can contribute towards the wider WFD objectives. Furthermore, the Lea water body (Tottenham Locks to Bow Licks / Three Mills Locks) (GB106038077852) is designated under the WFD and developments in proximity to this water body should deliver enhancements to support it meeting good ecological status. Further information about the pressures impacting on this water body is available at: Thames River Basin District Catchment Data Explorer.		This policy approach has now changed due to the need to better reflect the WFD. Please see the new wording in the implementation text to GWS2.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. This wording change has been made. Please see the new wording in the implementation text to Policy GWS2.	GWS2.1					GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/103	Environment Agency	Reg18-E-145
	Support noted. This wording change has been made. Please see the new wording in Policy GWS2.		3.178	GWS2 .2.b			GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/104	Environment Agency	Reg18-E-145
	Support noted.			GWS2 .2.e			GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/105	Environment Agency	Reg18-E-145

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/106	Green and Water Spaces	GWS2 Water spaces			GWS2 .2.f			[we support requirements to] improve flood defences and river walls (GWS2.2.f)	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/107	Green and Water Spaces	GWS2 Water spaces			GWS2 .2.g			[we support requirements to] the need for an integrated approach to water infrastructure (GWS2.2.g).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/108	Green and Water Spaces	GWS2 Water spaces			GWS2 .2.e			We recommend that policy requirement GWS2.2.e. is amended to include that the setback should be 16 metres for intertidal/tidal waters measured from the landward side of the flood defence. An 8 metre setback is required and measured from the landward side of any flood defence. This is in accordance with draft Local Plan Policy CE7.	This wording change has been made. Please see the new wording in the implementation text to Policy GWS2.2.
Reg18-E-145	Environment Agency	Reg18-E-145/109	Green and Water Spaces	GWS2 Water spaces					GWS2.2	In reference to implementation section GWS2.2, we welcome the direct reference to developers working with the Environment Agency as a key partner for development in close proximity to water space.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/110	Green and Water Spaces	GWS2 Water spaces					GWS2.2	We note that the importance of habitat connectivity and wildlife corridors for ecosystems and biodiversity is recognised in implementation section GWS2.2. We are very pleased to see our recommendations given on response to the Issues and Options consultation regarding no new or additional hardstanding or structures in the 8 / 16 metre buffer zones, and the	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Estuary Edges design principles have been included.									
		Furthermore, we are pleased to see the inclusion requirements for river re-naturalisation.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/111	Environment Agency	Reg18-E-145
		The wording for de-culverting could be stronger, for example stating river channels must be de-culverted, unless it is demonstrated this cannot be done. This would need to be accompanied with equal mitigation benefit for the river environment as part of the development.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/112	Environment Agency	Reg18-E-145
		A correction is required under 'Evidence base' for Policy GWS2 on page 219. The 'T' of 'TE2100 Plan' is missing.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/113	Environment Agency	Reg18-E-145
		we recommend the '2012' is omitted from the reference, to accommodate for the updated Plan, which is scheduled to be published later this year.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-145/114	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.						GWS2 Water spaces	Green and Water Spaces	Reg18-K-019/006	Gasworks Dock Partnership - Cody Dock	Reg18-K-019

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/007	Green and Water Spaces	GWS2 Water spaces			2. Development in, adjacent to, or affecting, water			An added protection which would be highly beneficial to the bats which feed along and over waterways would be to regulate the levels of artificial lighting cast over and around waterbodies as well as the type of lighting used. The use of low-level lighting instead of upward light and glare which cause disturbance to bat movements and which also maintain dark buffer zones should be used as standard along watercourses. LED lighting with warmer colour temperatures with peak wavelengths greater than 550nm (~3000°K) should be used as these have been shown to cause less impacts on bats.	This wording change has been made. Please see the new wording in the implementation text to Policy GWS2.2.
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/008	Green and Water Spaces	GWS2 Water spaces						It would be useful to have targets for improving River Water quality built into the Water Spaces plan so that these can be clearly measurable and can trigger appropriate action should quality drop below target.	A change to this monitoring framework has not been made. We did not consider this change to be necessary as water quality of our rivers is monitored under policy CE1.
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/027	Green and Water Spaces	GWS2 Water spaces						Greenspaces and Water Spaces The Authority supports the comprehensive policy for [green] and water spaces ([GWS1] and 2). These policies seek to protect and enhance the varied and multiple functions provided by [green] and water spaces and maximise opportunities to improve their quality, accessibility and connectivity.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/028	Green and Water Spaces	GWS2 Water spaces						There is however a policy gap in terms of clarifying the priorities for blue (or water) space. Water spaces within the Park in Newham are a fundamental part of the landscape linked to the heritage and biodiversity of the area but which seem to face increasing pressure due to the location of high density development. This is mentioned under implementation text GWS2.3 which states: "Water spaces provide significant habitats for wildlife, as well as a unique visual amenity which gives many parts of Newham a specific identity. There are also opportunities for leisure use and recreation activities both on and around the water. <u>The balance of these uses will be managed by directing an appropriate intensity and type of activation to the right water space locations</u>". It would be helpful if this point, underlined above, could be covered in the policy text.	This policy approach has now changed due to the need to strengthen its intention, which is to appropriately balance the need to activate water spaces with other considerations. Please see the new wording in Policy GWS2.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Green and Water Infrastructure Strategy (2024) includes mapping of the opportunities to improve green and water connectivity for each of the Local Plan Neighbourhoods. Policy BFN1 also specifically mentions the need for bridges across the Lea and crossings over the Lea are already indicatively reflected spatially in the Key Diagram. In addition, the Neighbourhoods chapter includes details on improvements to access to and quality of the River Lea edge and specifically mentions bridges in two Neighbourhoods (N6. Manor Road and N8. Stratford and Maryland). There is mapping to support this on at N8. but not at N.6, since the Manor Road neighbourhood has no site allocations.	Connectivity along water spaces The draft Local Plan includes a number of references in policy and implementation text about improving access to and along the borough's water spaces, in particular where access is currently restricted. Specific mention is made of the River Lea and River Thames. The Authority supports policy that will deliver these waterside routes and associated bridge connections; water spaces and associated towpaths along the Lea and Thames interact with the Regional Park, connecting key sites within the Park, both within Newham and Tower Hamlets. Partnership working between the London Boroughs of Newham and Tower Hamlets together with other key stakeholders on the Lea River Park and The Leaway is well advanced. This should be reflected in the Local Plan with the inclusion of an overarching framework including mapping that identifies the areas where improved connections including bridge links are needed in particular along the River Lea. This may be considered more appropriate for the Green and Water Spaces Strategy but it is important that opportunities for development to assist in delivering these connections is identified within the vision and infrastructure requirements set out for the Neighbourhoods.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-097/030	Lee Valley Regional Park Authority	Reg18-E-097

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/063	Green and Water Spaces	GWS2 Water spaces						Improved network of waterspaces - make them easier to get to	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/009	Green and Water Spaces	GWS2 Water spaces						The London Plan 2021 and Environment Act 2021 have introduced stronger policies on improving water quality. Newham has identified this in need of addressing and we would be interested in joint working on improving the Roding Valley and addressing flood risk management.	Support for joint working noted and welcomed.
Reg18-E-103	Marine Management Organisation	Reg18-E-103/006	Green and Water Spaces	GWS2 Water spaces						Further points to note Chapter 15. Green and Water Spaces, Page 216: You refer to the relevant marine plan we would also recommend you mention the South East Marine Plan here. Under the Marine and Coastal Access Act 2009, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the marine plan. [Hyperlink included in text to https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan__1_.pdf]	This policy approach has now changed to make specific reference to the South East Marine Plan by name. The Policy previously referenced the 'relevant Marine Plan'. Please see the new wording in Policy GWS3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-103	Marine Management Organisation	Reg18-E-103/007	Green and Water Spaces	GWS2 Water spaces						Alongside this, you could refer to the South East marine plan remit. The inshore marine plan area ranges from MHWS or the tidal limit out to 12 nm and the offshore marine plan area ranges from 12nm to 200nm or the territorial limit. This remit covers both the marine area and tidal rivers, and extends up to Mean High Water Springs where there is an overlap with terrestrial planning.	This wording change has been made. Please see the new wording in Policy GWS2.
Reg18-E-103	Marine Management Organisation	Reg18-E-103/008	Green and Water Spaces	GWS2 Water spaces						We would recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area. We would welcome evidence to show an understanding of the potential necessity of a marine licence and when they may be required	A change to this policy approach has not been made. We did not consider this change to be necessary as it is too detailed for the Local Plan. We would expect that this issue to be addressed via any applicant's referral to the Marine Plan.
Reg18-E-103	Marine Management Organisation	Reg18-E-103/009	Green and Water Spaces	GWS2 Water spaces						The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included. [Hyperlinks in text included: https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans and https://www.gov.uk/government/publications/the-south-marine-plans-documents]	Comment noted.

Reg18-E-103	Marine Management Organisation	Reg18-E-103/012	Green and Water Spaces	GWS2 Water spaces						Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page. [Hyperlinks included in text to: https://www.legislation.gov.uk/ukpga/2009/23/contents https://www.gov.uk/government/publications/uk-marine-policy-statement https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils <a 108="" 80="" 894="" 914"="" data-label="Page-Footer" href="https://www.local.gov.uk/pas/plan-making/local-plan-review-update/consultation-engagement/local-plan-reg-22-</p> </td><td>Comment noted.</td></tr> </table> </div> <div data-bbox="> 448

										consultation https://www.gov.uk/government/publications/using-marine-plans#Decisions https://www.gov.uk/government/publications/contact-the-marine-planning-team-at-the-mmo/marine-planning-officers-contact-details]	

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	Support noted.	Welcome reference to the PLA's Thames Vision in part 1b of the policy.					GWS2 .1b			Port of London Authority	Reg18-E-033
	Support noted.	In principle support part 2d which states that development proposals should improve the safety and public use of the borough's water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment. This is in line with the PLA's 'A Safer Riverside' guidance for development on and alongside the Tidal River Thames.					GWS2 .2d			Port of London Authority	Reg18-E-033
	This wording change has been made. Please see the implementation text for Policy GWS2 which now makes reference to suicide prevention measures.	To strengthen the policy further specific refence should also be given to the need for development to consider appropriate suicide prevention measures (such as appropriate fencing, signage and/or CCTV) to further improve the safety of the boroughs water spaces. This would be in line with the 2019 Drowning Prevention Strategy (http://pla.co.uk/Safety/Water-Safety/Water-Safety) which sets out practical steps to be taken to improve waterside safety for people close to the river					GWS2 .2d			Port of London Authority	Reg18-E-033
	Support noted.	Edges of water spaces and moorings I am pleased that the policy recognises the importance of water edge habitats and prohibits destruction of these via the building of hard surfaces, ...								Resident	Reg18-E-027

Reg18-E-027	Resident	Reg18-E-027/025.b	Green and Water Spaces	GWS2 Water spaces						Edges of water spaces and moorings ... but I am concerned about the amount of support for moorings of houseboats. I realise that for some people, buying a houseboat is the only way to get home ownership, and that mortgages in East London are prohibitively expensive, even for quite wealthy people. I live in a home owned by my husband in Stratford, even though we are both from poor backgrounds. We are older – this would be impossible now. But I do think that houseboats can have quite a negative impact on water biodiversity and water habitats. But it's not just houseboats – I've read somewhere in one your policies that 'water-related' and 'water dependant activities' will be permitted (in some circumstances). But the moorings of boats can be disastrous for wildlife, even where water edge habitats are not damaged. Let me give you 2 examples in the Olympic Park. Example 1: There used to be a thriving population of breeding reed warblers near the entrance of the Olympic Park. But then a 'pleasureboat' – sounds Victorian or sexy, it's neither, but I don't know what they're called – not a houseboat, was allowed to moor permanently next to it. There is a sort of wooden jetty been built, nothing concrete I don't think, and the water edge habitat and reed bed has not in itself been harmed. The boat however is a noisy, music-playing restaurant, so the reed warblers can't use the habitat any more. Example 2: There is a thriving colony of breeding	This policy approach has now changed due to new wording to provide clarity on the requirements for moorings. Please see the new wording in GWS4 and its implementation text. This policy continues to safeguard biodiversity by only allowing moorings and water activation where it will not negatively impact biodiversity. Implementation point 2 of this policy and its implementation text also now provides greater clarity on what we expect from development affecting water space.

										sand martins that have been breeding for years in the holes of the concrete banks of the canal near the Olympic Stadium. It was there before the building of the Olympic Park and is noted in the Olympic Park biodiversity action plan. I think the holes are leftover for something that used to be used by the boats when the canals were used for industrial purposes. There is no 'soft edge' – it's hard concrete. But it is still a very important habitat for a very scarce species in London. If boats were allowed to use these holes to moor their boats there, the colony would be destroyed. They breed only in the concrete banks. There are no suitable natural nesting sites for them in the Park. Again, this shows the importance of having in-house ecologists. It's not always as simple as it looks – it needs specialist knowledge.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-002	Resident	Reg18-E-002/029	Green and Water Spaces	GWS2 Water spaces						(I have been walking along by the Thames and some areas stink of raw sewage. Upon further inspection it seems that it's being allowed into the Thames once a week, and from different sources).	Comment noted. Pollution incidents on the River Thames are not something the policies in the Local Plan can directly address. If, while you are out you spot a pollution incident or any illegal activity on the River Thames please report it immediately to the Environment Agency, contact details can be found here: https://theriverstrust.org/key-issues/sewage-in-rivers/how-to-report-pollution-incidents-in-a-river . In addition, the purpose of Policy CE8 is to divert rain water from needing to enter the combined sewage system and instead ideally be reused or slowly drain into the ground. This will reduce the energy requirements for processing waste, reduce costs and reduce sewer flooding and overspill into rivers.
Reg18-E-002	Resident	Reg18-E-002/040	Green and Water Spaces	GWS2 Water spaces						And if the plan is to double the water traffic, this rather reduces the water space that gets included onto the green spaces.	Comment noted.

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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	I do enjoy walking beside the Roding where possible,					GWS2 Water spaces	Green and Water Spaces	Reg18-E-064/003	Resident	Reg18-E-064
	Comment noted.	being able to extend my walks into Newham along the river rather than along polluted roads would be wonderful					GWS2 Water spaces	Green and Water Spaces	Reg18-E-064/004	Resident	Reg18-E-064
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This	I was very interested to read about the Roding Back River that previously ran through East Ham					GWS2 Water spaces	Green and Water Spaces	Reg18-E-079/001	Resident	Reg18-E-079

Comment Response	means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	I appreciate this may be a long term ambition, however I recall Newham's ambitions plans for the Lower Lea which eventually came to fruition, opening up much of our western boundary to residents exploring park land alongside water courses, so it can be done.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-079/003	Resident	Reg18-E-079
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This	When I was in Cardiff recently I saw their works to reopen an historic waterway, although this was much more challenging than the Roding Back Water would be, as the Cardiff scheme involves extensive street works, while the Roding Back Water has never been developed.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-079/004	Resident	Reg18-E-079

Comment Response	means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.
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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	I support the River Roding Trust's plans to include the restoration of East Ham's Back River in the Newham Local Plan.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-081/001	Resident	Reg18-E-081

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-025	Resident	Reg18-T-025/013	Green and Water Spaces	GWS2 Water spaces						[Add to it] As above, providing more green and not less is key.	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.
Reg18-T-026	Resident	Reg18-T-026/017	Green and Water Spaces	GWS2 Water spaces						[Add to it] Newham needs a wild swimming pool. Maybe In the Marsh area... Beckton way.	The Local Plan addresses this topic through policies GWS1 and SI3. However, it cannot deliver the change you have requested. Our colleagues in the Parks and Leisure teams may be able to help. We have also provided them with your comments. In addition, Newham's Built Leisure Needs Assessment (2024) has set out the need for swimming pools in Newham and the sites where this new provision should come forward. The Built Leisure Needs Assessment will be published alongside the Local Plan Regulation 19 consultation.
Reg18-T-045	Resident	Reg18-T-045/002	Green and Water Spaces	GWS2 Water spaces						[Add to it] Keep it clean.	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.
Reg18-T-045	Resident	Reg18-T-045/003	Green and Water Spaces	GWS2 Water spaces						[Add to it] Stop fishing.	Comment noted.

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Reg18-T-047	Resident	Reg18-T-047/004	Green and Water Spaces	GWS2 Water spaces						[Keep it]	Support noted.
Reg18-T-050	Resident	Reg18-T-050/002	Green and Water Spaces	GWS2 Water spaces						[Add to it] Nothing	Support noted.
Reg18-T-053	Resident	Reg18-T-053/005	Green and Water Spaces	GWS2 Water spaces						[Keep it] Water spaces too are vital to the wellbeing of residents of our Borough and will contribute to air quality.	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.
Reg18-T-058	Resident	Reg18-T-058/034	Green and Water Spaces	GWS2 Water spaces						[Add to it] More River boat service and affordable price to local residents	Comment noted. Please see Local Plan Policy T1 regarding the use of water courses for transport.
Reg18-T-066	Resident	Reg18-T-066/003	Green and Water Spaces	GWS2 Water spaces						[Keep it]	Support noted.
Reg18-T-067	Resident	Reg18-T-067/003	Green and Water Spaces	GWS2 Water spaces						[Keep it]	Support noted.
Reg18-T-069	Resident	Reg18-T-069/003	Green and Water Spaces	GWS2 Water spaces						[Add to it] All the waterways should be kept clean,	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out

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	where future improvements in Newham can be made.										
	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.	[Add to it] All the waterways should be [kept clean,] mostly kept for the wildlife					GWS2 Water spaces	Green and Water Spaces	Reg18-T-069/004	Resident	Reg18-T-069
	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.	[Add to it] All the waterways should be [kept clean, mostly kept for the wildlife] and where appropriate leisure and sporting activities.					GWS2 Water spaces	Green and Water Spaces	Reg18-T-069/005	Resident	Reg18-T-069
	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.	[Add to it] Old, blocked and unused waterways should be opened up.					GWS2 Water spaces	Green and Water Spaces	Reg18-T-069/006	Resident	Reg18-T-069

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Reg18-T-069	Resident	Reg18-T-069/007	Green and Water Spaces	GWS2 Water spaces						[Add to it] Pollutants, like the raw sewage that is currently being poured in, plus waste from businesses should be outright banned	Comment noted. Pollution incidents on the River Thames are not something the policies in the Local Plan can directly address. If, while you are out you spot a pollution incident or any illegal activity on the River Thames please report it immediately to the Environment Agency, contact details can be found here: https://theriverstrust.org/key-issues/sewage-in-rivers/how-to-report-pollution-incidents-in-a-river . In addition, the purpose of Policy CE8 is to divert rain water from needing to enter the combined sewage system and instead ideally be reused or slowly drain into the ground. This will reduce the energy requirements for processing waste, reduce costs and reduce sewer flooding and overspill into rivers.
Reg18-T-071	Resident	Reg18-T-071/008	Green and Water Spaces	GWS2 Water spaces						[Keep it] It would be useful to see a plan with ALL the green spaces and water ways in Newham.	Comment noted. Please see the Green and Water Infrastructure Strategy (2024) which is published alongside the Regulation 19 Local Plan consultation. In addition, the Regulation 19 Policies Map is an online mapping resource which allows you to see the various green and blue space layers in the borough.
Reg18-T-071	Resident	Reg18-T-071/009	Green and Water Spaces	GWS2 Water spaces						[Keep it] I am particularly interested in the waterway at Folkstone Road Allotments which has had no maintenance for years. We once had ducks and swans 10 years ago.	Comment noted. We have provided the Parks team with your comments regarding Folkstone Road Allotments.
Reg18-T-073	Resident	Reg18-T-073/003	Green and Water Spaces	GWS2 Water spaces						[Keep it] Good to see 'opportunities to increase access to nature' along the River Roding. There is so much scope here.	Support noted.

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Reg18-T-082	Resident	Reg18-T-082/013	Green and Water Spaces	GWS2 Water spaces						[Add to it] There should a water fountain [a swimming pool] in local green spaces or wherever available	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 and GWS5 already set out an expectation to provide drinking water facilities in green and play spaces.
Reg18-T-082	Resident	Reg18-T-082/014	Green and Water Spaces	GWS2 Water spaces						[Add to it] There should [a water fountain] a swimming pool in local green spaces or wherever available	The Local Plan addresses this topic through policies GWS1 and SI3. However, it cannot deliver the change you have requested. Our colleagues in the Parks and Leisure teams may be able to help. We have also provided them with your comments. In addition, Newham's Built Leisure Needs Assessment (2024) has set out the need for swimming pools in Newham and the sites where this new provision should come forward. The Built Leisure Needs Assessment will be published alongside the Local Plan Regulation 19 consultation.
Reg18-T-108	Resident	Reg18-T-108/012	Green and Water Spaces	GWS2 Water spaces						[Add to it] More water spaces like Ponds in local parks	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made.
Reg18-T-109	Resident	Reg18-T-109/046	Green and Water Spaces	GWS2 Water spaces						[Add to it] Again Newham is overcrowded and suffering from... overcrowding	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's policies requiring the delivery of affordable and family-sized homes, including 5% four bedroom homes on site allocations, will help to address issues of overcrowding in the borough.

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Reg18-T-109	Resident	Reg18-T-109/047	Green and Water Spaces	GWS2 Water spaces						[Add to it] Again Newham is [overcrowded] and suffering from noise pollution,	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D7 (Neighbourliness) requires developments to avoid unacceptable exposure to noise.
Reg18-T-109	Resident	Reg18-T-109/048	Green and Water Spaces	GWS2 Water spaces						[Add to it] Again Newham is [overcrowded and] suffering from [noise pollution, overcrowding] and ASB	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection

Comment Response	Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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Reg18-T-109	Resident	Reg18-T-109/049	Green and Water Spaces	GWS2 Water spaces						[Add to it] Again Newham is [overcrowded] and suffering from [noise pollution, overcrowding and ASB] as well as flytipping	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.

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Reg18-T-109	Resident	Reg18-T-109/050	Green and Water Spaces	GWS2 Water spaces						[Add to it] Again Newham is [overcrowded] and suffering from [noise pollution, overcrowding and ASB as well as flytipping] and crime.	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach

Comment Response	services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as the local plan already supports water activation and uses in policy GWS2. In addition, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning. Please also see Newham's Built Leisure Needs Assessment (2024) which sets out the need for swimming pools in Newham and the sites where new provision should come forward. Both the Green and Water Infrastructure Strategy and the Built Leisure Needs Assessment will be published alongside the Local Plan Regulation 19 consultation.						GWS2 Water spaces	Green and Water Spaces	Reg18-T-116/005	Resident	Reg18-T-116
	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out						GWS2 Water spaces	Green and Water Spaces	Reg18-T-116/006	Resident	Reg18-T-116

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	where future improvements in Newham can be made.	Because water waste should be avoided too.									
	Support noted.	[Keep it]					GWS2 Water spaces	Green and Water Spaces	Reg18-T-126/021	Resident	Reg18-T-126
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This	However, the existence of the A406 means that restoring full connection between East Ham and the River Roding will be both difficult and somewhat imperfect.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-132/005	River Roding Trust	Reg18-E-132

Comment Response	means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.
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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	Righting a historic wrong. The filling in of the back river was a travesty that would be unlikely to be allowed in modern times. Ordinarily we cannot turn the clock back to correct the mistakes and destructive attitude towards nature of less enlightened times. However, the Back River is just such an opportunity to do this.l677					GWS2 Water spaces	Green and Water Spaces	Reg18-E-132/008	River Roding Trust	Reg18-E-132

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Reg18-E-132	River Roding Trust	Reg18-E-132/009	Green and Water Spaces	GWS2 Water spaces						- <i>A rare and perhaps unique opportunity.</i> The growth of London led to many rivers being covered over, or (like the Back River) filled in. Most of these rivers have been built over, so to restore them would be impossible or at the least extremely expensive. The Back River is one of the few rivers in London that has been filled in, but not built on. It therefore represents a very rare opportunity to restore such a river.	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

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Reg18-E-132	River Roding Trust	Reg18-E-132/010	Green and Water Spaces	GWS2 Water spaces						- <i>Providing much needed green/blue space.</i> Newham has significantly less green public space than most London Borough's. Further, very little of the green space that it has contains a significant element of water or wildness. Restoring the Back River would provide not just much-needed green/blue space, but also such space with a significant wild element.	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

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Reg18-E-132	River Roding Trust	Reg18-E-132/011	Green and Water Spaces	GWS2 Water spaces						- <i>Restoration chimes with proposed developments in the Local Plan.</i> A number of developments in East Ham would benefit from the restoration of the Back River. In particular, the site of East Ham gasworks for which development is proposed in the Local Plan covers a significant length of the old course of the Back River. Given that publicly accessible green space is proposed on the part of the site along which the Back River ran, the restoration would complement this development and indeed give it a unique and exciting facet.	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	- <i>Excellent for wildlife & biodiversity.</i> Saltmarsh and back river channels meandering through them are one of the richest and rarest habitats in London.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-132/012	River Roding Trust	Reg18-E-132

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Reg18-E-132	River Roding Trust	Reg18-E-132/013	Green and Water Spaces	GWS2 Water spaces						- <i>A much-needed North-South link in the Borough.</i> The Borough has insufficient North-South links for cycling and walking. The restoration of the Back River could also include a path providing such a link.	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

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Reg18-E-132	River Roding Trust	Reg18-E-132/014	Green and Water Spaces	GWS2 Water spaces						- Connecting East Ham with the River Roding. The Back River left the River Roding at the Saltings near the District Line and returned to it at Hand Trough Creek. Both of these points have a route under the North Circular. Therefore, any path alongside the Back River could also be used to link East Ham to the River Roding. Further, providing publicly accessible green space along the route of the Back River would provide more points that would allow connection between Newham and the main River Roding.	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

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Comment Response	
Comment	By WW2, the East Ham Marshes had been drained & covered in rows of housing or playing fields. The Back River was obliterated & largely forgotten; remembered only by local historians & in the shape of the 'Saltings' where it left the Roding & 'Hand Trough Creek' where it rejoined the Roding.
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Representor	
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Reg18-E-132	River Roding Trust	Reg18-E-132/017	Green and Water Spaces	GWS2 Water spaces						The Route [see rep for images] Starting at the 'Saltings' next to the River Roding, where the Back River diverged from the main channel. This still had the exact shape it did in the 1890's. Also, the fact that the North Circular is elevated here means the river could flow underneath it to its old course. Next, we come to the old gasworks sports field, with its open grassland denoting the flat lands of the East Ham Levels, & its soaring gasometer. There are proposals to develop part of this site, but not the course of the Back River, which is Metropolitan Open Land. The River Roding Trust (as part of its Roding Edgelands vision) has imagined what a re-dug Back River could look like as part of this development: a fantastic place for local people & wildlife in an area that currently severely lacks wild green/blue space. Next: an old sports field, which remains undeveloped due to its status as Met Open Land. Large poplar trees & standing water attests to the fact this used to be a marsh. This is owned by a charity & restoring the river would restore use & amenity to lots of local people that is lacking in its current derelict and unused state. After London Road the Back River ran through what is now a school. Luckily, although restricted by spiked fencing, there's a strip of land on the East side of the school through which a	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

										resurrected Back River could flow. There's even an existing row of poplars it could flow past! After the school, the route goes through open & undeveloped scrubland that runs adjacent to an existing public footpath. It's easy to imagine how much nicer it would be to walk this path with a natural, reed-fringed river beside it, rather than a metal fence. Finally, there is a very exciting discovery. Although it is overgrown, the water glinting in the reeds confirms it: a 200 metre section of the original river still intact, & with flowing water at one point! Even in its degraded state, it showed what the river could be again. At the end of this section, a tunnel takes the remains of the river under the A406 & back into Hand Trough Creek, where the Back River historically rejoined the Roding. This tunnel means it is possible to restore the entire length of the River as a flowing river, which is incredibly exciting.	

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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to provide greater clarity on what we expect from development which will impact water space. Please see the new wording in implementation text for Policy GWS2. The revisions made to the emerging plan have placed far greater emphasis on the importance of water space in Newham. Indeed, the adopted Local Plan has no policy on the borough's water spaces. In this regard, the emerging Local Plan has provided more focus on this important element of Newham's landscape. Please also see the amendments to the Neighbourhood chapter and relevant site allocations which highlight the potential to improve Newham's water spaces. In addition, Newham's Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs is published alongside the Local Plan Regulation 19 consultation.	Green and Water Spaces The Royal Docks is unique in the scale and impact of its water bodies. The Plan should reflect this and policy GWS2 should have a specific section about the need to increase access and use of the water in the Royal Docks and that the increase in use should be part of an overall strategy for the water in the Royal Docks.					GWS2 Water spaces	Green and Water Spaces	Reg18-E-092/025	Royal Docks	Reg18-E-092
	Support noted.	[Keep it]					GWS2 Water spaces	Green and Water Spaces	Reg18-T-063/011	Student	Reg18-T-063

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. There is currently no capacity in the Planning Policy Team at Newham to develop a water space framework plan for Bow Creek.	The updated GWS2 policy is good, but it would be a great opportunity and of great benefit to include a joined up policy framework for the whole of Newham's water spaces. For example, a mini water space framework plan for Bow Creek, where heritage wharves which can be reactivated with moorings opportunities. Zoned areas along the creek where either industrial and small commercial water based enterprises could be based and residential mooring zones could be, with mixed use zones in between, along with biodiversity improvement goals and zones. As a starting point to be included in this updated water spaces plan, we believe the historic Pacific Wharf along the Channelsea River and the confluence of Abbey Creek and Channelsea River by the Greenway Bridge, would be a perfect example of a water space that could be a designated zone for residential moorings reactivation. [A:1]		2. Development in, adjacent to, or affecting, water			GWS2 Water spaces	Green and Water Spaces	Reg18-K-002/001	Surge Cooperative Limited	Reg18-K-002

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Reg18-K-002	Surge Cooperative Limited	Reg18-K-002/002	Green and Water Spaces	GWS2 Water spaces			2. Development in, adjacent to, or affecting, water			Ideally the water space policies for Bow Creek would be drawn up in conjunction with LBTH as both sides of the river are jointly in the respective boroughs, which could easily lead to incompatible plans, if not done in consultation.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. We work collaboratively with neighbouring authorities to ensure coordination.
Reg18-K-002	Surge Cooperative Limited	Reg18-K-002/003	Green and Water Spaces	GWS2 Water spaces			2. Development in, adjacent to, or affecting, water			We would welcome a comprehensive policy on Newham's water spaces and have done some preliminary research on the opportunities and improvements that could be made. This is in our soon to be released updated Bow Creek Vision Document, the older version is here: https://surgeco-op.co.uk/wp-content/uploads/2018/06/Surge-Co-op-Vision-for-a-barge-friendly-Bow-Creek-web-2.pdf We have looked at this ourselves, and worked with planning consultants to draw up some rough ideas, but have limited funding to be able to spend the time to fully flesh out our thoughts and proposals yet. As a key stakeholder on Bow Creek and the Channelsea River / Abbey Creek,	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. There is currently no capacity in the Planning Policy Team at Newham to develop a water space framework plan for Bow Creek.

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		with a keen interest to reactivate the water space, we would be happy to be consulted further to help create a more comprehensive water space plan.									
	A change to this policy has not been made. We did not consider this change to be necessary as moorings are already supported in appropriate locations in policy GWS2.	We believe affordable cooperative moorings should be supported in the Local Plan. [A:1]		3. Applications for water-related or water-			GWS2 Water spaces	Green and Water Spaces	Reg18-K-002/004	Surge Cooperative Limited	Reg18-K-002

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-002	Surge Cooperative Limited	Reg18-K-002/004	Green and Water Spaces	GWS2 Water spaces					GWS2.4	As may be noted from our recent court order agreement with the Port of London Authority for Bow Creek above the PLA's Jurisdiction - It may be appropriate to change the wording here, to something similar to ""We will work in partnership with the appropriate authorities and stakeholders of the relevant water spaces which may include"".. the Port of London Authority and the Canal and River Trust... We suggest it would be good to include a specific desire to work with organisations like ourselves: Surge Cooperative as stakeholders and to also consult with the Inland Waterways Association and the The Barge Association. Other groups like National Bargee Travellers Association and the Residential Boat owners Association, can also offer good advice in consultations for improved water space reactivation." [A:1]	This policy approach has now changed due to reflect the need to work with stakeholders. However, we have not listed out specific organisations such as Surge Cooperative here, since this will be site-dependent. Please see the new wording for the implementation text GWS2.4.
Reg18-K-002	Surge Cooperative Limited	Reg18-K-002/005	Green and Water Spaces	GWS2 Water spaces					GWS2.2	Heritage Assets, should also include mooring infrastructure, like mooring rings, bollards, Campshedding of the riverbed to make it safe for vessels to rest on the mud at low tide etc - As we have seen many new developments remove this infrastructure rather than repair and replace, which means the	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		heritage and reactivation opportunities are lost for future generations.[1]									
	A change to this policy approach has not been made. We did not consider this approach to be necessary as safeguarded wharfs provide an industrial mooring function. Please see policy wording in J1 and T1.	Whilst it is appropriate to keep residential moorings for residential areas, it would also be beneficial to have industrial moorings re-instated for industrial areas.		4. Applications for residential and visitor moorings			GWS2 Water spaces	Green and Water Spaces	Reg18-K-049/001	Surge Cooperative Limited	Reg18-K-049
	A change to this policy approach has not been made. We did not consider this change to be necessary as if a pier is being used for a water dependent use e.g. moorings or access to the water it would be supported by this policy. However, further changes have been made to this policy to provide greater guidance on how development around water can be designed to provide multiple benefits to both people and the environment.	This point should be clarified so as not to exclude the reactivation of heritage wharves and moorings opportunities which could also include biodiversity improvements and mitigations in their construction. Whilst still enabling the 8m set back in principle.					GWS2 Water spaces	Green and Water Spaces	Reg18-K-049/002	Surge Cooperative Limited	Reg18-K-049
	Comment noted.	Surge is a key stakeholder and would be happy to share our policy research and suggestions with Newham. In determining the suitability of residential and visitor moorings, we					GWS2 Water spaces	Green and Water Spaces	Reg18-K-049/003	Surge Cooperative Limited	Reg18-K-049

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		can be of valuable assistance due to our large amount of research in the area.									
	This wording change has been made. Please see the new wording in Policy GWS2.	[Add to it] Thames21 host the London Lea Catchment Partnership and co-host the Roding, Beam and Ingrebourne Catchment Partnership. These partnership groups include stakeholders from both catchments (including the EA, Thames Water and local authorities) that have an interest in improving the rivers in these areas. Both catchment partnerships are directed by the catchment action plan which set out a list of targets the partnerships are working towards for improving their rivers and wetlands. It would be beneficial to Newham to reference these catchment action plans in GWS2: Water Spaces Point 1.		1			GWS2 Water spaces	Green and Water Spaces	Reg18-T-061/001	Thames 21	Reg18-T-061
	Comment noted. Please see Policy CE8 which requires all development to reduce the risk of surface water flooding, through separating foul and surface water flows and incorporating Sustainable Urban Drainage Systems (SuDS) that reduce surface water run-off.	[Add to it] Sustainable Urban Drainage Systems (SuDS) should be included in the plan as being part of all new developments.					GWS2 Water spaces	Green and Water Spaces	Reg18-T-061/002	Thames 21	Reg18-T-061

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Reg18-T-061	Thames 21	Reg18-T-061/003	Green and Water Spaces	GWS2 Water spaces						[Add to it] The plans should include a commitment from Newham Council to tackle water pollution issues from misconnections under the building regulations act.	Comment noted. Please see Policy CE8 which requires all development to reduce the risk of surface water flooding, through separating foul and surface water flows and incorporating Sustainable Urban Drainage Systems (SuDS) that reduce surface water run-off.
Reg18-T-013	Woodland Trust	Reg18-T-013/004	Green and Water Spaces	GWS2 Water spaces						[Add to it] The Woodland Trust supports this policy	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/005	Green and Water Spaces	GWS2 Water spaces						[Add to it] [The Woodland Trust supports this policy] and requests that mention of riparian trees and wet woodland be added to section 2b: eg "There should be no negative impacts on the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, the character, and heritage value..."	This policy approach has now changed to make specific reference to the riparian trees and wet woodland as suggested. Please see the new wording in Policy GWS3.
Reg18-E-070	Aston Mansfield	Reg18-E-070/095	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						c. GWS3: Biodiversity, Urban Greening and Access to Nature - Would you keep, change or add something to this policy? Aims of the policy Supported .	Support noted.

Reg18-E-070	Aston Mansfield	Reg18-E-070/096	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						<i>6. Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimised development impacts:</i> <i>a. Avoid damaging the significant ecological features of the site.</i> <i>b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site.</i> <i>c. Deliver off-site compensation, in Newham, of better biodiversity value.</i> <i>d. Where appropriate compensation is not possible, planning permission will be refused.</i> Object: 1 st sentence of GWS36 implies blanket protection contradicting the remaining paragraph. Flexibility upon such land where the harm is minimised and mitigated represents the most appropriate solution to ensure housing needs are met. Suggested change to wording 6. [Delete: <i>Sites of Importance for Nature Conservation</i>	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London

									<i>should be protected.] Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimised development impacts:</i> <i>a. Avoid damaging the significant ecological features of the site.</i> <i>b. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site.</i> <i>c. Deliver off-site compensation, in Newham, of better biodiversity value.</i> <i>d. Where appropriate compensation is not possible, planning permission will be refused.</i>	Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
Reg18-E-099	Beckton Alp Real Estate Ltd	Reg18-E-099/028	Green and Water Spaces	GWS3 Biodiversity, urban greening			GWS3		It is recognised that draft Policy GWS3 (Biodiversity, urban greening and access to nature) states that all development should protect and	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		enhance biodiversity, and that SINCs should be protected.					and access to nature				
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINCs was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINCs (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINCs and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINCs and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINCs to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINCs. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a	Where benefits of a development outweigh impact on biodiversity, the proposals should still avoid damaging the significant ecological features, improve quality and management of the rest of the Site and deliver off-site compensation.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-099/029	Beckton Alp Real Estate Ltd	Reg18-E-099

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	suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted.	To support the proposed redevelopment of a designated SINC, a separate ecology note has been appended to the letter setting out how the proposed redevelopment would not have any negative impacts on the SINC designation and would be able to maintain the quality of its biodiversity provisions.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-099/030	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	The review of the Site concludes that the value of the existing woodland is limited and that it would benefit from management to enable the delivery of a healthy habitat that comprises strong and mature tree specimens.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-099/031	Beckton Alp Real Estate Ltd	Reg18-E-099
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022).	Furthermore, the proposed redevelopment will result in some loss of grassland but it is considered that this can be easily compensated with green infrastructure such as green roofs and wall.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-099/032	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response	The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINCL and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	More detailed studies during design development will allow for the remaining habitats to be enhanced over their current condition as part of the proposals.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-099/033	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has been made to give more prominence to water spaces in this policy. Please see the new wording in Policy GWS3.	GWS3: Biodiversity, urban greening, access to nature We would like more prominence given to water spaces in this policy, including towpaths and walking/cycling routes being improved to provide better access to nature. It is not clear from the existing Proposals Map but the Bow Back Rivers do not appear to have SINC status, but they are still valuable ecological features that support					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-143/013	Canal and River Trust	Reg18-E-143

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		wildlife, and have the potential to support increased biodiversity. The currently proposed policy appears to exclude water spaces that are not designated as SINC.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3.3 specifically addresses the need to improve access to nature. GWS3.c provides a mitigation measure, where the delivery of onsite SINC is not possible, to improve access to existing SINC. It would not be appropriate to specify water spaces here.	"3. Development in areas deficient in access to nature should seek to deliver new or improved green or water spaces which have ~~intrinsic~~ nature conservation value <u>or</u> that would qualify as a Borough Site of Importance for Nature Conservation. Where this is not possible development should seek to deliver: c. improved walking routes and access to <u>and along</u> nearby accessible <u>water spaces</u> and Sites of Importance for Nature Conservation."		3			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-143/014	Canal and River Trust	Reg18-E-143
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy W3 requires new housing development to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole. This is further expanded in the policy's implementation text.	We also forgot to include a suggestion for a mandatory composting space/s in developments					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-133/003	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-006	Community Group Representative	Reg18-T-006/010	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Keep it] It would be good to look at green/ smart lampposts / [as well as green roofs/ green walls] to offset air pollution etc	Support noted.
Reg18-T-006	Community Group Representative	Reg18-T-006/011	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Keep it] It would be good to look at [green/ smart lampposts /] as well as green roofs/ green walls to offset air pollution etc	Support noted.
Reg18-T-023	Community Group Representative	Reg18-T-023/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Keep it]	Support noted.
Reg18-T-107	Community Group Representative	Reg18-T-107/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Change it] More floating gardens at the dock edge so locals can enjoy the dock while encouraging biodiversity and wildfowl. The floating garden is a wonderful addition to Royal Victoria Dock.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS2 sets out the approach to development on or adjacent to the water.
Reg18-E-040	CPRE	Reg18-E-040/077	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Beckton Sewage Works] The site has high ecological value: its perimeter is designated as a SINC and the parts of the Treatment Works are also identified as part of the Green Chain This means that the site still fulfils objectives c and d of the London plans policy 7.17 on Metropolitan Open Land and should remain designated to protect the site's biodiversity.	Comment noted. This site remains as designated MOL.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/115	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						We strongly support this comprehensive policy aimed at delivering nature recovery and enhancing biodiversity in Newham.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/116	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			GWS3 .5			We are pleased to see the Urban Greening Factor (UGF) requirements of London Plan Policy G5 are recognised at GSW3.5.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/117	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			GWS3 .4		Implementation comment	As mentioned earlier, Natural England's Green Infrastructure Framework should be referenced here and used to inform implementation guidance. This framework should also be added to the policy's evidence base on page 224.	This wording change has been made. Please see the new wording in Policy GWS3 which now references the Natural England Green Infrastructure Framework in the list of evidence base.
Reg18-E-145	Environment Agency	Reg18-E-145/118	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			GWS3 .4			Whilst we welcome policy requirement GWS3.4 for the delivery of biodiversity net gain, we recommend the wording here is strengthened from 'should', to 'must' deliver.	This policy approach has now changed due to the need to better reflect the Environment Act 2021. Please see the new wording in Policy GWS3 which now reflects this suggested text amended.
Reg18-E-145	Environment Agency	Reg18-E-145/119	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					GWS3.5	In reference to implementation section GWS3.5., we agree that development proposals must secure a net gain in biodiversity value and are pleased to see that the need to prioritise on-site measures is clearly stated. We are also satisfied that the latest Defra biodiversity metric is referenced, and the need for a biodiversity net gain assessment. There are also positive	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		links to the Environment Act 2021, such as the need for a long-term management / maintenance plan (30 years) and the minimum 10% gain requirement.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as there are sufficient links to nature based solutions to climate change across the Local Plan, including in the Green and Water Spaces chapter.	The policy could be strengthened by clarifying that biodiversity net gain requirements include those that help tackle climate change, such as Nature-based solutions (NbS). Biodiversity net gain offers considerable scope to help create resilience places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-145/120	Environment Agency	Reg18-E-145
	A change to this policy approach has not been made. We did not consider this change to be necessary as improvements to water spaces is sufficiently addressed in GWS2.	There is also opportunity here to make a more direct link to improve water quality and prevent deterioration of water bodies, as required under the WFD.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-145/121	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to guide the reader to where they can see Newham's Sites of Importance for Nature Conservation (SINCs). Please see the new wording in the implementation text for Policy GWS3. Newham's SINCs was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINCs (including those within the area currently administered by the London Legacy Development Corporation) and analysis of aerial imagery followed by site visits to existing SINCs and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINCs and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINCs to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINCs. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022).	GWS 3 - In the Implementation section you mention SINC sites and upgrading but do not give any details.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-044/011	Friends of West Ham Park	Reg18-E-044

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/012	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						The Newham Green and Water Spaces Strategy - Interim Report - recommends that West Ham Park SINC status is upgraded from Local to Borough. This should be included in the Local Plan as an implementation action.	This policy approach has now changed due to the evidence from Newham SINC Review (2022). Please see the Policies Map for the proposed updated designation.
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/013	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						In addition you include policy provision on green corridors. West Ham Park's bio-diversity is limited by its 'isolation' from other green areas. As discussed at the Stratford Consultation Forum, there is a potential opportunity, over time, to create a new green corridor from West Ham Park via Stratford Park - West Ham Churchyard - Abbey Gardens to the Greenway and thus reducing its 'isolation'.....and its bio-diversity potential should be recognised by becoming a Borough Level SINC with improved links to other nearby green spaces.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024). Please see the new wording in the Neighbourhoods chapter which now reflect this evidence base in relation to improvements to green corridors. Please see site allocations N8.SA1 Stratford Central, N8.SA2. Stratford Station, N15.SA1 Lord Lister Health Centre and N15.SA2 Woodgrange Road West and the neighbourhoods N9 West Ham, N14 Green Street N15 Forest Gate. The 2022 SINC review also proposes to take this site forward as a SINC of Borough importance, upgraded from Local. Please see the Policies Map for the proposed updated designation.
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/009	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						An in-house expert would be able to lead on the collection and analysis of data beyond a desk-study and reliance on third-parties. This ground truthing is an essential part of ecological research and should be incorporated into all works that directly or indirectly impact on biodiversity within the borough. To be able to seriously address the issues and opportunities in-borough such as: habitat loss and degradation, species and habitat conservation, climate-	Comment noted. The Green and Water Infrastructure Strategy (2024) has been completed since the Regulation 18 Local Plan consultation. This updated evidence base has improved our knowledge of the borough's green and water spaces. The Council is currently seeking to improve our in-house ecology expertise.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		adapted landscapes, BNG; and to liaise between developers, agencies and residents an investment in a Biodiversity lead would be greatly advantageous.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 is designed to align with the latest BNG approach.	BNG gains from developments should be secured for a longer period than 30 years. This is an ideal opportunity to create and preserve habitats for future generations within and adjacent to new developments.		4. Development should deliver a Biodiversity Net			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-K-019/010	Gasworks Dock Partnership - Cody Dock	Reg18-K-019

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/011	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			6. Sites of Importance for Nature Conservation			Following the 2018 LAP, the proportion of the Lea River Park known as Cody Wilds (the section of footpath between the A13 road bridge and Twelvetrees Crescent road bridge) was removed from the industrial SIL and redesignated as green infrastructure. As part of the planning permission for Prologis Park and Electra, many native hedges, trees and mixed vegetation and grasses have been planted and become established along Cody Wilds. This area of mature shrub now supports an abundance of wildlife including nesting House Sparrows (<i>Passer domesticus</i>) which are on the UK Red List and are protected under the Wildlife and Countryside Act (1981). Since then work that was undertaken as part of the Lea River Park design manual implementation of this cross-borough project seems to have stalled and the linear park known as the Leaway or Cody Wilds was not considered in the recent SINC review (2022). It already has multiple designations, including: Greenspace, Cycle Quietway, Leeway, Strategic Walking Route, Local Park/Small Open Space/Pocket Park and is now, in our view, of sufficient ecological significance that SINC status should be considered for Cody Wilds. This should also include the native trees and hedging on the Prologis estate	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022).

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Comment	bordering the publicly accessible Cody Wilds. This would add significant gains to the biodiversity of the area by linking with the existing M031 River Thames and Tidal Tributaries SINIC.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/012	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					GWS3.5	We feel that the implementation of a minimum BNG requirement of 10% for developers could be more ambitious. Biodiversity gains may also, in some cases, be better served by an agreed hectare area (2 hectares) of new developments being committed to the creation or reestablishment of habitats to be set aside sympathetic to the habitats lost to the development where BNG would be less than 20%. This would be especially welcome in developments which have a low biodiversity baseline. This could also go some way to providing the additional publicly accessible greenspace required in the borough as indicated in GSW3.174 and GSW3.176.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 is designed to align with the latest BNG approach. Newham's Green and Water Infrastructure Strategy (2024) has evidenced our approach and sets out why a minimum 10% BNG is being sought.
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/013	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					Monitoring	We strongly feel that it would be to the benefit of the council and biodiversity if targets were to be set for minimum gains of biodiversity and habitats within the borough (beyond BNG and UGF). These should relate to the retention, improvement and creation of a variety of habitats and should take advantage of the opportunities presented by new developments and any improvement works in the public realm. Ideally, exceeding the minimal requirement of no-net-loss, to improve connectivity, quality and native and priority species richness and abundance. Targets allow for the ongoing measurement, management,	This policy approach has now changed due to the need to better reflect the Environment Act 2021 and the requirement for a minimum 10 per cent Biodiversity Net Gain. Please see the new wording in Policy GWS3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		and (if needed) penalisation of projects relating to biodiversity and habitat gains in the borough.									
	Comment noted. We took the SINC's Review to the September London Wildlife Sites Board. At this meeting the work was praised for its quality and thoroughness. At this meeting there was unanimous agreement from the board to approve Newham's SINC review.	Newham is undertaking a Site of Importance for Nature Conservation (SINC) review currently as part of this local plan review. Based on the interim report, 5.5 hectares of SINC is proposed to be deleted, which includes 4 hectares of Star Park as it is a monoculture park. The park boundary itself is not affected, but the SINC designation is proposed to be removed. Approximately 35 hectares of new SINC is being proposed to be added. The borough should consult with the London Wildlife Sites Board (LWSB) prior to confirming any proposed changes and coordinate with the neighbouring boroughs.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-093/034	Greater London Authority	Reg18-E-093

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/035	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			5			As stated in draft policy GWS3 part 5, the Mayor will support a bespoke Newham Urban Greening Factor in line with Policy G5 B LP2021, which is tailored to local circumstances and helps address the climate emergency. The borough should follow the Urban Greening Factor London Plan Guidance, in particular: “When developing local UGF targets, boroughs should retain the following key elements of Policy G5: • the calculation methodology; • the surface cover types set out in London Plan Table 8.2; and • the surface cover factor scores set out in London Plan Table 8.2.”	Support noted. However, this policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.
Reg18-E-130	Hadley Property Group	Reg18-E-130/143	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Hadley supports the requirements for development to contribute to nature recovery in Newham, including “maximising opportunities to create new onsite habitats and deliver missing ecological links”, “maximising ‘living building’ elements as a key feature of site and building design”.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/144	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Hadley is also supportive of the policy for developments to deliver a Biodiversity Net Gain of at least 10 per cent, secured in perpetuity (at least 30 years) in line with national guidelines.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/145	Green and Water Spaces	GWS3 Biodiversity, urban greening						However, Hadley requires that further detail is provided to supplement the application of a “bespoke Newham urban Greening Factor” and how this	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
				and access to nature						would be used to determine this in a consistent way	approach in London Plan Policy G5. Please see the new wording in Policy GWS3.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/080	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Environment and Transport Draft Policy GWS3 – Biodiversity, Urban Greening, and Access to Nature We consider that draft Policy GWS3 needs amending to allow for the hierarchy of delivery to align with the Environment Act, in so far as ‘on-site first’, ‘off site second’ and if neither are achievable, biodiversity credits should be secured	This policy approach has now changed due to a need to align with the latest BNG approach. Please see the new wording in GWS3.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/081	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						We propose that the policy should also make reference to off-site biodiversity gains to be allowed within a neighbouring authority where there is no other suitable available land available within the Borough.	This policy approach has now changed due to a need to align with the latest BNG approach. Please see the new wording in GWS3.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/082	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						We support the approach of replicating that of the London Plan in respect of urban greening.	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS3 follows the London Plan approach to the Urban Greening Factor.	However, we highlight that the target ratio of 0.4 can be challenging to achieve in high-density urban contexts, and so suggest that the criteria 5 is caveated to enable justification if the target score cannot be met.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-068/083	Hollybrook Homes	Reg18-E-068

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/031	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Biodiversity The Authority supports the detailed policy provisions for biodiversity, access to nature and urban greening set out under policy GWS3 particularly the emphasis on the need for ecological assessments set out within the policy and the implementation guidance.	Support noted.
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/032	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			1.f			GWS3 f) refers to the need for development to demonstrate “through a Management Plan how existing and new areas of biodiversity value will be maintained”. Ensuring adequate funding is allocated for new areas of biodiversity will be an important part of the development. It is suggested that the sentence is amended to read <i>“how existing and new areas of</i>	This policy approach has now changed due to the need to ensure it make reference to funding, as suggested. Please see the new wording in Policy GWS3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<i>biodiversity value will be funded and maintained</i> include will be funded and maintained"									
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 provides sufficient protection to the ecological value and interconnectivity of the Lee Valley Park. There is no need to specifically reference this particular park in the policy.	A significant area of the Regional Park within Newham, particularly the waterways are designated as Sites of Importance of Nature Conservation (SINCS) and development within the site allocations adjacent will need to carefully assess the ecological value and interconnectivity of these biodiversity assets, particularly if access to nature is to be widened within the Borough. Policy GWS3 bullet 2, references the impacts of major developments on SINCS and priority or protected species and the need to submit an ecology statement. Potential impacts on the wider Lee Valley SPA should also be considered particularly in terms of the relationship between development and potential impacts to the migratory route through the Lee Valley.		2			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-097/033	Lee Valley Regional Park Authority	Reg18-E-097

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Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/034	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					Evidence	It is not clear if reference has been made to the Authority's Biodiversity Action Plan 2019 – 2029 in respect of this section of the Plan or in relation to the work underway as part of the interim Green and Water Spaces Strategy. The Authority would wish to be involved with the detail of this work as it considers the biodiversity baseline and opportunities to reduce areas of deficiency in Newham.	This wording change has been made. Please see the new wording in the evidence base section for Policy GWS3.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/010	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Epping Forest SAC is a key strategic issue affecting both ourselves and Newham and we look forward to continuing working with you jointly on Epping Forest SAC matters.	Comment noted. We welcome the support for continuing our joint work on the Epping Forest SAC.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/015	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						The London Borough of Waltham Forest in its role as a neighbouring borough and Duty to Cooperate partner, are of the view that the Newham Local Plan will need to include robust, well evidenced policies and monitoring indicators that set out how the Newham Local Plan will both avoid and mitigate the effects on air quality and recreational pressures in Epping Forest Special Area of Conservation. These policies should include detail of an appropriate SANG (Sustainable Alternative Natural Greenspace) Strategy and commitment to the SAMMS (Strategic Access Monitoring and Management Strategy)	Comment noted. We welcome the support for continuing our joint work on the Epping Forest SAC. We are undertaking work on a SANGs Strategy to support the delivery of the Local Plan.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		partnership. The SANGS strategy will need to be developed in collaboration with Natural England and the City of London Corporation (Conservators of Epping Forest).									
	This policy approach has now changed due to reflect the approach to off-site BNG contributions. Please see the new wording in GES3.4.	Representations to other policies <i>Policy GWS3: Biodiversity, urban greening and access to nature.</i> Part 4 of the policy seeks a Biodiversity Net Gain of at least 10% for development, secured in perpetuity. LCY has a low biodiversity value but for the important reason of aviation safety. As such, the airport could not commit to a Biodiversity Net Gain of 10% but instead would seek an equivalent off-site contribution. The policy should be explicit in allowing off-site contributions where it is not feasible to provide on-site, particularly for sites in proximity to the airport		4			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-057/027	London City Airport	Reg18-E-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		where opportunities are limited due to safety requirements.									
	This wording change has not been made. We did not consider this change to be necessary as Policy GWS3 contains the necessary mitigation opportunities should an on-site biodiversity measure not be feasible due to airport safety.	Part 1e seeks to maximise biodiversity measures within the London City Airport Public Safety Zone but caveats this to ensure the airport is safeguarded from bird strike. Notwithstanding the limited potential for biodiversity measures within the Public Safety Zones, the policy should prioritise aviation safety over biodiversity enhancement. A suggested rewording provided in the Annex.		1.e			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-057/028	London City Airport	Reg18-E-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the need to better reflect the Environment Act 2021. Please see the new wording in Policy GWS3.4.	[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES] • Page/Policy: GWS3: Biodiversity, urban greening, and access to nature, P220 • Current Wording: 4. Development should deliver a Biodiversity Net Gain of at least 10 per cent, secured in perpetuity (at least 30 years), especially those sites that are adjacent to a Site of Importance for Nature Conservation or which could strengthen or better connect to an existing green corridor. • Commentary: No airport development could commit to a 10% Biodiversity Net Gain due to aviation safety requirements. However, such a commitment could be directed to an off-site contribution. • Suggested Change: Add the following sentence to the end of the paragraph: Where it has been demonstrated that a Biodiversity Net Gain of 10% cannot be delivered on-site, an equivalent off-site contribution will be sought.		4			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-057/052	London City Airport	Reg18-E-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Policy GWS3 already stipulates that applicants must ensure the airport is appropriately safeguarded from bird strikes. The airport is consulted on all applications which impact on the London City Airport Public Safety Zone.	[Annex 1: LB Newham Draft Local Plan – Regulation 18 Consultation LCY SUGGESTED CHANGES TO POLICIES] • Page/Policy: GWS3: Biodiversity, urban greening, and access to nature, P220 • Current Wording: 1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity. This will be achieved through: ... e. maximising biodiversity measures within the London City Airport Public Safety Zone, whilst also ensuring that the airport is appropriately safeguarded from bird strike • Commentary: Aviation safety should take precedent over biodiversity measures. This should be reflected in the sentence structure. • Suggested Change: Replace paragraph e. with: Where an aviation safety case allows, biodiversity enhancement measures within the London City Airport Public Safety Zones.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-057/053	London City Airport	Reg18-E-057
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.	This makes reference to the development of a Newham Urban Greening Factor. While this is not yet available it would be helpful to understand the proposed methodology for this and how this might differ from the London plan UGF approach.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-052/118	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. An assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing proposed SINC designation for this site remains in place. Please see the Newham SINC Review (2022).	It is noted elsewhere in these comments that large areas of the Queen Elizabeth Olympic Park are proposed as a new Site of Importance for Nature Conservation. It would be helpful to understand the basis of this and whether there are likely to be any impacts on the future uses of this space that would be part of the strategy for active use of this Metropolitan Park and consequently whether this aspect of use needs to be taken account of within the policy.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-052/119	London Legacy Development Corporation	Reg18-E-052

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/013	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						<i>Priority Habitats</i> The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.	Comment noted. The Green and Water Infrastructure Strategy has been completed since Regulation 18 and its findings have informed the Local Plan and its IIA.
Reg18-E-144	Natural England	Reg18-E-144/014	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Priority Habitats] Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	[Priority Habitats] Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 175 of the NPPF.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-144/015	Natural England	Reg18-E-144

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<i>Biodiversity Net Gain</i> The Environment Act 2021 requires Biodiversity Net Gain (BNG) as a mandatory condition of planning permission from November 2023. A Biodiversity Gain Plan will need to be submitted by developers to set out the strategy for achievement of BNG for development proposals, including metric calculations as well as information not captured in the metric e.g. species factors; habitat management plans; how biodiversity net gains will be managed and maintained The key requirements of mandatory BNG are set out below: • A minimum of 10% BNG • Developers must use the statutory metric to be produced and published by the Secretary of State (SoS) for Defra to calculate gains and/or losses of habitat • BNG can be delivered on-site or off-site as units, or as a last resort via the statutory credits system, currently under development. • Land delivering off-site BNG will be required to be formally registered on the national Biodiversity Gain Site register, currently under development. • Land delivering habitats for BNG will have to be legally secured and maintained for a minimum of 30 years. Further guidance on mandatory BNG and how it will be implemented has					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-144/016	Natural England	Reg18-E-144

Comment Response	
Comment	recently become available via the Government response to the recent BNG Regulations and Implementation consultation. Natural England are happy to work with Newham Council as work around BNG progresses to ensure it is fully embedded in local policy.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/017	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Biodiversity Net Gain] We also strongly recommend the Policy outlines local priorities for targeting off-site BNG in strategically important and locally relevant areas that will have most benefit for people and wildlife; existing local authority strategies and evidence bases (e.g. local GI strategies, biodiversity mapping etc.), that may feed into the forthcoming Local Nature Recovery Strategy (LNRS) for London, can be used to identify such sites. It is worth noting the latest version of the Biodiversity Metric applies a 'strategic significance' scoring that adds an incentive to developers to encourage habitat creation in such areas.	A change to this policy approach has not been made. Newham's Green and Water Infrastructure Strategy (2024) provides a baseline understanding of our green and water infrastructure. The Council, as Local Planning Authority, landowner and park department are still considering how best to build on this work and opportunities offered by biodiversity net gain.
Reg18-E-144	Natural England	Reg18-E-144/018	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Biodiversity Net Gain] It may be appropriate for the Policy to confirm the intention for a Supplementary Planning Document (SPD) to be developed to provide further detail within an appropriate timescale, particularly where the local plan policy seeks to build on minimum requirements of mandatory BNG, and to outline potential schemes or projects for delivery in line with local priorities; for example outlining a range of projects locally available for developer contributions, such as the favourable management and enhancement of local wildlife sites within the district. Such an approach may facilitate the delivery of off-site	A change to this policy approach has not been made. Newham's Green and Water Infrastructure Strategy (2024) provides a baseline understanding of our green and water infrastructure. The Council, as Local Planning Authority, landowner and park department are still considering how best to build on this work and opportunities offered by biodiversity net gain.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		BNG in line with LPA priorities for nature and residents.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 adheres to the hierarchy in paragraph 180 of the NPPF (2023).	[Biodiversity Net Gain] The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 180 of the NPPF. Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible, impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. BNG should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-144/019	Natural England	Reg18-E-144

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/020	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for designated sites should be dealt with separately to BNG provision.	This policy approach has now changed due to the need to be explicit in the implementation text for Policy GWS3 that Biodiversity Net Gain should not applied to irreplaceable habitats. Policy GWS3 now also makes clear that any mitigation and/or compensation requirements for designated sites should be dealt with separately to BNG provision. Please see the new wording in the implementation text for Policy GWS3.
Reg18-E-144	Natural England	Reg18-E-144/021	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						We also recommend local plan policy for BNG communicates how cases of deliberate site clearance before an assessment of BNG baseline will be addressed. Developers should be aware that site degradation carried out to achieve a reduction in BNG required for a development, is not acceptable. Where an LPA suspects such a case and cannot agree a revised baseline assessment date with the developer, then the baseline date defaults back to 30th Jan 2020 in line with the primary legislation.	A change to this policy approach has not been made. We did not consider this change to be necessary as there is no need to replicate the existing regulations in Policy GWS3.
Reg18-E-144	Natural England	Reg18-E-144/022	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						In addition, we recommend the policy sets out that smaller wildlife features such as bat boxes and swift bricks could be included as part of a wider biodiversity enhancement and mitigation plan, separate to biodiversity net gain commitments.	A change to this policy approach has not been made. We did not consider this change to be necessary as there is no need to replicate the existing regulations in Policy GWS3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as there is no need to replicate the existing regulations in Policy GWS3.	<i>Monitoring of net gain</i> Your Plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the Plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions. LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.	Monitoring				GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-144/023	Natural England	Reg18-E-144

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/031	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						As mentioned above, the discussions around the emerging Epping Forest Strategic Solution are ongoing, and we would expect the Strategic Governance Agreement to have been agreed by all parties prior to the next draft of the Newham Local Plan. However, should this not be the case, The East Hampshire Local Plan provides good example wording that could be used to reflect the similar situation with Epping Forest SAC in paragraph 2 of SP22 'Internationally Designated Sites'. We would expect there to be a policy commitment to contributing towards mitigation measures set out in the Epping Forest mitigation strategy and the policy should also state that this should be in place by the time the Local Plan is adopted.	A change in this policy approach hasn't been made. We did not consider this change to be necessary as such wording is already included in part 7 of policy GWS3. The Strategic Governance Agreement has now been signed and we are commissioning a SANGs study to further support this policy.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/014	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Policy GWS3: Biodiversity, urban greening, and access to nature As well as designated as open space, the area adjacent to the north east is also proposed to be designated as a Site of Importance for Nature Conservation (SINC). This would transfer the adopted LLDC designation back to LBN. Draft Policy GWS3 (Biodiversity, urban greening, and access to nature) seeks for development to contribute to nature recovery in Newham by protecting and enhancing biodiversity. Development in close proximity to a SINC is required to submit an ecological assessment. Furthermore, there is a requirement for development to deliver a Biodiversity Net Gain of at least 10 per cent, especially those sites that are adjacent to a SINC. The requirements of this policy are supported. Any future development proposals will need to consider the adjacent SINC and ensure that this is not impacted. Improvements to the biodiversity on site at Bow Goods Yard could in turn help to protect and enhance the adjacent SINC.	Support noted.
Reg18-E-033	Port of London Authority	Reg18-E-033/020	Green and Water Spaces	GWS3 Biodiversity, urban greening			GWS3 .4			In principle support part 4 of policy GWS3 which states that development should deliver a Biodiversity Net Gain	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		(BNG) of at least 10% secured in perpetuity (at least 30 years).					and access to nature				
	Comment noted.	For information the PLA is currently involved in a project to develop a pilot habitat bank for the Tidal Thames within Newham with a particular focus on intertidal and riverine habitats to enable developers to offset impacts locally, delivering net gain and enhancing the habitats of the River Thames corridor within the borough. Specifically this project has involved the determination of existing biodiversity baseline values, the identification of management options to improve existing biodiversity values with the aim to encourage the increase in biodiversity value within the borough					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-033/021	Port of London Authority	Reg18-E-033
	Comment noted. We welcome discussing this project with you and are keen to be kept informed of its future development.	Work is ongoing on the project, with further detailed output including GIS mapping of the biodiversity baseline habitats likely to be produced by summer 2023 which will form part of the wider PLA Thames Masterplan work for the borough. The PLA has had an initial meeting with the council to discuss this project and would be willing to further discuss and share the outcome of this work to help develop the evidence base on this topic for the Local Plan and policy GWS3.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-033/022	Port of London Authority	Reg18-E-033

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Greenspaces and bluespaces policy Biodiversity as a priority and conflict between wildlife and people I think it's really important to have biodiversity as a priority for green spaces and blue spaces. There's understandably been a lot of emphasis on ensuring fairness in people's access to greenspaces, and the benefits to physical and mental health. Whilst I agree that there should be fairness, and that it is wrong that some people have no access to greenspaces, I don't think this should be confused with the idea that people should have a general right of access to all greenspaces even when it is detrimental to wildlife. I think wildlife's right to peace and a home should take at least as equal priority to people. We have a biodiversity and nature crisis. That has got to take priority over the idea that people should have some kind of blanket right to use green spaces for whatever they choose. The pressure put on wildlife and biodiversity on recent years by people's idea that nature is their playground is increasing and is a growing and major threat to biodiversity in the few precious wild spaces we still have. The worst culprits are often those who claim – and maybe believe – that they are 'in touch with nature', and this has been encouraged					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-027/017	Resident	Reg18-E-027

Comment Response	
Comment	by the media, in particular those sections of the media that claim to be in favour of environmental protection (eg. The Guardian.) For example, foraging has had a major negative impact on local nature reserves in East London, as has wild swimming, and doing things like cycling and yoga in the middle of meadows, crushing the wildflowers. The taking of dead wood from Hackney marshes – when it is deliberately there as an important wildlife habitat – is another big problem.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The Council is currently seeking to improve its in-house ecology expertise to assist with the delivery of Policy GWS3.	Importance of specialist knowledge to manage habitats for biodiversity As alluded to in my comments on the evidence base for Greenspaces and Blue spaces, in order to increase biodiversity, or even protect the existing levels of biodiversity, it's really important to have knowledgeable people managing it. It requires specialist knowledge; the habitats required by insects for example – insects being necessary for the survival of so many other species – are not always obvious, and not always very attractive or popular with the public. But without them, you can forget about any chance of protecting biodiversity. You can't just leave wild areas – they have to be actively managed. Without an in-house ecologist, how will you know the right time to cut hedges? And the right time to cut meadows? And the right time to do pond maintenance? How will you know the difference between a perennial weed that will smother a wildflower meadow, and the newly emerging wildflower itself, that you are trying to protect?					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-027/018	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/019	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Conversely, enthusiastic but ill-informed 'habitat management' can be equally disastrous. For example, there is a great deal of enthusiasm for tree-planting at the moment. The mantra goes: 'Tree-planting – good for wildlife, good against air pollution, good to stop climate change – what's not to love?' Well, what's not to love is that grasslands are just as important as trees for wildlife and biodiversity, and our wild grasslands and meadows are in at least as much decline as our woodlands. Unfortunately some meadows have been accidentally destroyed by people planting trees on them. What makes it worse is that some species of trees have very little ecological value. (I hope this hasn't happened to the fantastic meadow you used to have at Beckton Park – I read that there was tree planting going on there or planned there. I haven't been there recently as this isn't my part of the borough.)	Comment noted. The Council is currently seeking to improve its in-house ecology expertise to assist with the delivery of Policy GWS3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The Greenway Pollinator Trail has seen recent improvements to this Newham asset, please see here for more information: https://www.newham.gov.uk/PollinatorTrail	The Greenway This seems to be an example of what happens when you don't take account of any of the points I've raised above. I remember many years ago walking through the Greenway and it was a fantastic wildflower meadow, full of butterflies. Newham council confirmed to me in writing that it was officially managed as a wildflower meadow at some point. But in recent years, it has been just a 'green space', in the sense of just a traffic-free route for people and cyclists. The grass is kept cut short, it is almost completely devoid of any ecological value, biodiversity and wildlife.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-027/020	Resident	Reg18-E-027

Reg18-E-027	Resident	Reg18-E-027/021	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					Monitoring	Policy's inadequate monitoring and measurement practices So far, I've given examples of well-meaning but ill-informed practices. But even more concerning is the lack of robust independent measuring and monitoring practices regarding developers, who will most certainly not be well-meaning. There is a lot in the policy about developers must not have a negative impact on biodiversity, must improve biodiversity, or must replace lost features. But it seems very vague about how this will be monitored and measured. How will you be able to assess if developers claims that they are 'improving biodiversity' are true, if you a)don't have a clear definition and measurement regarding biodiversity and b)don't have anyone assessing it who is independent and suitably qualified? It seems to rely entirely on the developers policing themselves. If they present you with an ecological assessment, who in the Council is going to evaluate that? I am pleased that you have said about one part of it that it must be done by a qualified ecologist – I think that's what it is supposed to say, but there's a typo – but how free is this ecologist going to be if they are employed by the developer? We have seen from the Council's climate change evidence base how easy it is to manipulate figures, to deceive without actually lying or breaking the law. Of particular concern is the requirement to 'replace lost features'. Developers will tell you they have done this. But what they won't say is that the colony of insects that has been breeding on that 'lost feature' will have been	Comment noted.

										destroyed – just planting a meadow or hedge won't immediately replace it, and in a place like Newham, where isolated fragments of wilderness remain – well, destroy a colony of anything, even insects, and they won't come back. Secondly is the issue that the replacement tree, hedge, or meadow may look great when it is newly replaced – but trees will take a long time to mature, and the new plants may not 'take' in the new place, even if nearby. They may be dead a year later. Habitats aren't furniture – you can't just move them over.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/023	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Managing fire risks in greenspaces Given the catastrophic fires that devastated many green spaces last year, including some superb wildlife sites in London, I think it's really important that wildlife sites are managed in a way that mitigates this risk. Although dry grass from climate change is the reason for the increase, and therefore the risk is set to increase, in most cases the fire has been lit by people's behaviour, sometimes deliberately, but more often accidentally. It's imperative then that smoking, barbecues, and leaving glass bottles are banned by the Council in all council greenspaces, and that the Council uses whatever powers they have to enforce these bans, and works with other enforcement agencies. There may be pressure from some people to cut down long grass and remove dead wood, in an effort to reduce the risk of wildfires. It's really important that this pressure is resisted, because this comes from people who don't understand or value wildlife sites. The risk needs to be reduced by reducing people's risky behaviour, not by proactively destroying wildlife sites before they are destroyed by fire. In some places, cutting small areas as fire breaks might be advisable though.	The Local Plan addresses this topic through Policy GWS3. However, it cannot deliver the change you have requested. A change to this policy approach has not been made. We have also provided the Parks team with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/024	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			6			Policy GWS3 -6 I am very concerned about the following: 6. 'Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimised development impacts' This is just giving a green light to developers to destroy Sites of Importance for Nature Conservation and protected and priority species and habitats. Of course they will argue that the benefits of the development clearly outweighs the impacts on biodiversity, when you aren't giving any definition of what that means and how that will be assessed. 'Clearly' in this context means completely different things to an ecologist and a developer.	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS3 provides a clear mitigation hierarchy which should be applied to minimise development impact on SINCs. This approach accords with paragraph 180 of the NPPF (2023) and the hierarchy in Policy G6 of the London Plan (2021).

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		In terms of the Greenway, I don't understand why it stopped being managed for biodiversity – many, many years ago, but after the Greenway signage went up, it had wildflowers and long grass and was full of butterflies. Now it is mainly cut short and has no butterflies or visible wildlife and is more of a traffic-free road than a wildlife site. The Interim Strategy mentions the Greenway and I appreciate this is in the context of measuring what is currently there, but it is also important to look at how it could and should be better managed for biodiversity (which to be fair the chapter does in many respects).					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-027/027	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/028	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						I appreciate the argument that is given about an increase in biodiversity will not actually deliver much biodiversity in Newham given the low baseline and the net gain being allowable outside the borough, BUT I am concerned at the absence of any other safe way of measuring biodiversity. As this Interim Strategy states, the Urban Greening Factor does not include any requirement to increase or even protect the existing biodiversity. I therefore do think that: -it is vital that the London Plan uses ecologists or, even if not qualified ecologists, experts by experience such as London Wildlife Trust, to measure biodiversity evidence bases. -There needs to be some evidence base system of actually measuring biodiversity -There needs to be a goal of increasing biodiversity as much as is allowed under the current planning legislation, and a mechanism to bring this about	Comment noted. The Council is currently seeking to improve its in-house ecology expertise to assist with the delivery of Biodiversity Net Gain in Newham and Policy GWS3 more broadly.
Reg18-E-004	Resident	Reg18-E-004/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Also the problem with contractors that destroy greenery and biodiversity. We need more rewilding rather than cut everything growing and that would save money	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	You have a wonderful opportunity to restore a river with its associated environmental and ecological benefits to benefit the environment and residents of the Boroughs of Newham, Redbrige and Barking and Dagenham. Please take it.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-064/002	Resident	Reg18-E-064

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/004	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						" Thus, Information relating to BNG could be usefully included in each Site Allocation to help developers understand the implications / viability of their development proposals. GIGL https://www.gigl.org.uk/ is working on a mapping methodology that can map habitats remotely, providing an assessment of the baseline BNG value (without needing to visit the site). This could help developers assess the viability of sites in the context of mandatory BNG - and ensure meaningful discussions are had as early as possible. This could have helped the Bromley-By-Bow site, which from the recent SINC review, has assessed much of the site to be of ecological value. For more information about the mapping method, speak to eleni.foui@gigl.org.uk.	A change to this policy approach has not been made. We did not consider this change to be appropriate as we do not currently have the BNG baseline information for the site allocations.
Reg18-E-091	Resident	Reg18-E-091/027	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Where gardens' back onto Sites of Importance for Nature Conservation (SINC), homeowners should be encouraged to design extensions and garages with green roofs and nesting opportunities as standard.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 already seeks to maximise living building elements as a key feature of a development. The implementation text for this policy provides further detail on what design features may be appropriate.
Reg18-T-003	Resident	Reg18-T-007/006	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Keep it] I agree with the plan on rewilding,	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Keep it] I agree with the plan on [rewilding,] and putting an 'economic value' to green space. I think this type of thinking should be commended, as it is somewhat indirect and positive effects are emergent over a longer timeframe.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-007/007	Resident	Reg18-T-003
	Support noted.	[Add to it] I welcome more tree cover. Newham is not green enough.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-011/018	Resident	Reg18-T-011

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add to it] I would like to see all existing parks protected from development, including West Ham Park.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-011/019	Resident	Reg18-T-011

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS4 already seeks to protect existing trees.	[Add to it] One thing that concerns me about the clause about replacing trees (2a) is that a veteran tree will sequester more carbon and provide more habitat than a newly planted, young tree. I feel something needs to be added to this section to make sure veteran trees receive some sort of protection given their enhanced					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-011/020	Resident	Reg18-T-011

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		abilities as carbon stores and wildlife habitats.									
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-025/014	Resident	Reg18-T-025
	Comment noted. The Local Plan addresses fly tipping through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people	[Add to it] Get more low traffic neighbourhood zones so that you can catch fly tippers and give them big fines.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-026/018	Resident	Reg18-T-026

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.										
	Support for the Greenway is noted. Comment noted. The policies in the Green and Water Chapter of the Local Plan continue to highlight the importance of improving access to Newham's green and water spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Add to it] The green way is a great initiative. We need more. Not many exciting walk in Newham apart from the greenway and the QE Park. Beckton could be so much better					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-026/019	Resident	Reg18-T-026

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published						GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-034/046	Resident	Reg18-T-034

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	alongside the Local Plan Regulation 19 consultation.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate. The Green and Water Spaces Infrastructure Strategy (2024) has provided up-to-date evidence to support this chapter and its targets. It has mapped Newham's existing green and water spaces and set out where we can make improvements to deliver an enhanced network of spaces. The mapping behind the Strategy has established that the provision of publicly accessible greenspace should not fall below 0.71 hectares per 1,000 Head of	[Change it] The aim of the council should be to increase the green space to levels compatible with London average.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-036/004	Resident	Reg18-T-036

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	Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.										
	Comment noted. Policy GWS3 seeks to protect and deliver enhanced biodiversity in Newham. The importance of this approach is evidenced in Newham's Green and Water Infrastructure Strategy (2024) and Newham's SINC Review (2022).	[Add to it] Need more protection for biodiversity					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-045/004	Resident	Reg18-T-045
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-047/005	Resident	Reg18-T-047
	Comment noted. The policies in the Green and Water Chapter of the Local Plan continue to highlight the importance of improving access to Newham's green and water spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Change it] Newham Residents need access to nature through Green spaces like West Ham Park.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-048/013	Resident	Reg18-T-048
	Support noted.	[Add to it] Nothing					GWS3 Biodiversity, urban greening	Green and Water Spaces	Reg18-T-050/003	Resident	Reg18-T-050

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							and access to nature				
	[Change it] Do not build any housing on westham.park This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance						GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-051/007	Resident	Reg18-T-051

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	[Keep it] Biodiversity matters. This is something that open spaces such as parkland and waterways allow to be developed further.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-053/006	Resident	Reg18-T-053

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-056	Resident	Reg18-T-056/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Change it] At the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. The Newham population is expected to increase by 2038 by c.100,000 people and so there is the requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. However, as you may be aware there are currently plans by the Corporation of London to sell and develop a portion (the "Nursery Site") of the Grade 2 listed West Ham Park to build blocks of flats. As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less. Therefore, we need the local plan to properly protect our local parks. Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland. My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

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	Comment noted. Planning Policy GWS1 and GWS3 both continues to support the provision of green space at roof level.	buildings in Newham can have greenery at the top of the building such as trees, and plants and follow the Singapore motto, [Origionally Submitted on Section 1: All about Newham.]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-058/008	Resident	Reg18-T-058
	Comment noted. Planning Policy GWS1 and GWS3 both continues to support the provision of green space at roof level.	buildings in Newham can have greenery at the top of the building such as trees, and plants and follow the Singapore motto,					GWS3 Biodiversity, urban greening	Green and Water Spaces	Reg18-T-058/014	Resident	Reg18-T-058

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		[Originally submitted in Section 2: Vision and Objectives]					and access to nature				
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-066/004	Resident	Reg18-T-066
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-067/004	Resident	Reg18-T-067

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/008	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] The promises made in council meetings prior to the Olympics about maintaining and indeed fostering the wildlife of that area, were not kept. It used to be a haven for wildlife and now the Olympic park has some biodiversity but nowhere near what it had before. I rarely visit the park, as apart from the waterway which was already there, one feels it is just spaces between buildings, such a pity. All the lovely wildflower seeding and display was obviously for the Olympics only as it has not been upkeep.	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not

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	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.										
	Support noted.	[Add to it] I applaud plans for the greenway and hope the noxious smells do not deter the plants.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-069/009	Resident	Reg18-T-069

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/010	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] The trouble with the greenway is the monotony and the fear of cyclists coming up behind you - at peak hours it is like a highway, not a leisurely place.	Comment noted. The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
Reg18-T-069	Resident	Reg18-T-069/011	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] The large open green area beside the three mills studio has never been very successful - I'm not sure what the original plan was, but it got flooded and was unusable for a long time. That area would be beautiful wooded with paths, flowers, butterflies, benches.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the maintenance of a specific park, is not provided in the Local Plan, nor is it something the Local Plan can deliver. However, it should be noted that Policy GWS1 does require new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15-years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the

Comment Response	requirements of the Public London Charter principles will be met and secured. We have also provided the Park team with your comments.
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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted.	[Add to it] The park is already overused in the summer months as there is nothing similar to it of decent size to actually do anything in, in the area. [referring to WH Park]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-069/013	Resident	Reg18-T-069

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Reg18-T-069	Resident	Reg18-T-069/015	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Please Newham council, do not give planning permission to turn it into buildings that will only detract from the park, make it 'overlooked' and spill out more people. Let that awful block in the corner of Hermit Rd recreation ground be a warning. Please council, don't be taken in by the tiny offerings of green space offered by the construction of new towers. [referring to WH Park nursery]	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Unfortunately, it was not clear what change or you wanted to make to this part of the Plan. No changes have been made.	[Keep it] As above but also getting more businesses involved.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-071/010	Resident	Reg18-T-071
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening	Green and Water Spaces	Reg18-T-076/003	Resident	Reg18-T-076

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							and access to nature				
	Comment noted.	[Add to it] The larger an area is the more biodiverse it will be, so although lots of extra tiny parks and parklets will add to the overall Green Space it won't much biodiversity. Adding to existing Green Space though would allow for more biodiversity					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-085/003	Resident	Reg18-T-085

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	The nursery area of West Ham park which has remained dormant for a few years should be reestablished as public open space, as it was in the beginning I understand. It should under no circumstances be used for housing. You say the borough needs more open green public spaces and this is a simple solution to add a large area to an established park that has existing provisions to maintain it in excellent order at no cost to the council. The latter being a bonus for the council in these hard times.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-094/003	Resident	Reg18-T-094

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's policies requiring the delivery of affordable and family-sized homes, including 5% four bedroom homes on site allocations, will help to address issues of overcrowding in the borough.	[Add to it] Again Newham is overcrowded and suffering from... overcrowding					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-109/051	Resident	Reg18-T-109

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-109	Resident	Reg18-T-109/052	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Again Newham is [overcrowded] and suffering from noise pollution,	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D7 (Neighbourliness) requires developments to avoid unacceptable exposure to noise.
Reg18-T-109	Resident	Reg18-T-109/053	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Again Newham is [overcrowded and] suffering from [noise pollution, overcrowding] and ASB	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where

Comment Response	appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.						GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-109/054	Resident	Reg18-T-109

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-109	Resident	Reg18-T-109/055	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Again Newham is [overcrowded] and suffering from [noise pollution, overcrowding and ASB as well as flytipping] and crime.	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-116/007	Resident	Reg18-T-116
	Support noted.	[Keep it]					GWS3 Biodiversity, urban greening	Green and Water Spaces	Reg18-T-126/022	Resident	Reg18-T-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							and access to nature				
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3 is designed to align with the latest BNG approach.	Part 4 of Policy GWS3 of the Newham Draft Local Plan (Reg 18) requires development to deliver a Biodiversity Net Gain of at least 10%, secured in perpetuity, especially those sites that are adjacent to a Site of Importance for Nature Conservation or which could strengthen or better connect to an existing green corridor. Although the requirement for Biodiversity Net Gain is expected to be passed through in the Environment Act later in 2023, Local Plans do not need to repeat this requirement in planning policy and in accordance with national policy duplication should be avoided.		4			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-110/033	Sainsbury's Supermarkets Ltd	Reg18-E-110
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.	6. Sustainability and Greening a. Draft Policy GWS3 (Biodiversity, urban greening, and access to nature) <u>SEGRO supports the principle of the draft Policy to protect and enhance biodiversity in LBN.</u> SEGRO is very supportive of creating sustainable industrial buildings and 'green' schemes.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-116/042	SEGRO Plc	Reg18-E-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.	However, it must be acknowledged that the opportunities and mechanics to deliver these greening/biodiversity benefits are more challenging on industrial sites. This is acknowledged by the London Plan (Policy G5) where B2 and B8 uses are excluded from the Mayor's target Urban Greening Factor ('UGF'), albeit supporting paragraph 8.5.5 does state that such uses will still be expected to set out what measures they have taken to achieve greening on site.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-116/043	SEGRO Plc	Reg18-E-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of biodiversity improvement a site can provide will naturally vary according to the application and site context. As set out t in the implementation text to Policy GWS3, living building elements enhance biodiversity, examples of living building elements include, but are not limited to: • green and brown roofs • green walls • swift bricks and artificial nest sites • roost bricks for bats and designing lighting in a bat friendly way • ensuring boundaries allow hedgehogs to move freely • nature based Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscape form and vegetation.	Part (1)(d) of draft Policy GWS3 requires development to maximise 'living building' elements and this reflects the approach set out in part (1)(e) of draft Policy D1. Urban greening on SEGRO's schemes is typically delivered through the inclusion of measures such as soft landscaping and planting along site boundaries, tree planting within car park areas / along site boundaries, green roofs on offices and cycle/bin stores and the use of permeable paving. Whilst SEGRO is committed to improving biodiversity, it is also committed to ensuring other sustainability benefits which are evidenced by SEGRO's track record in London, which includes delivering the first carbon neutral industrial unit for Camden Town Brewery in Enfield and the first BREEAM Outstanding industrial unit for Rolls Royce at Heathrow. Installing green roofs on warehouse buildings can have significant sustainability impacts. The additional steel and concrete required to increase the structure to support a green roof would increase embodied carbon levels by c.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-116/044	SEGRO Plc	Reg18-E-116

Comment Response	
Comment	10%. SEGRO also often looks to utilise roof space to provide PV panels to provide a low carbon and renewable energy source. Furthermore, SEGRO often installs roof lights, which are a key feature of industrial buildings and comprise a principle natural light source which reduces reliance on artificial lighting.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/045	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			1d			Green roofs also have a viability implication due to the additional structures required, and SEGRO's cost plans indicate that such systems increase total development costs for industrial buildings by c.15%. Green walls can be appropriate in the right environmental conditions , however SEGRO is aware that the GLA is currently resisting these features until they have a better understanding of the potential safety implications.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the type of biodiversity improvement a site can provide will naturally vary according to the application and site context. As set out t in the implementation text to Policy GWS3, living building elements enhance biodiversity, examples of living building elements include, but are not limited to: • green and brown roofs • green walls • swift bricks and artificial nest sites • roost bricks for bats and designing lighting in a bat friendly way • ensuring boundaries allow hedgehogs to move freely • nature based Sustainable Drainage Systems which mimic natural processes in managing rainfall through the use of landscape form and vegetation.
Reg18-E-116	SEGRO Plc	Reg18-E-116/046	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			5			Part (5) of the draft Policy states that development should meet the London Plan UGF, or a bespoke LBN UGF (albeit no details are provided in respect of the bespoke UGF). The UGF calculations often place a heavy reliance on green walls / green roofs. As set out above, these are often not appropriate for industrial uses.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/047	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						<u>Draft Policy GWS3 should be reviewed to ensure that it is not placing unreasonable burdens on industrial development.</u> The draft Plan needs to ensure that it encourages industrial development, and development that considers all sustainability implications.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.
Reg18-E-116	SEGRO Plc	Reg18-E-116/048	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						<u>It is recommended a similar approach is taken to the London Plan (Policy G5)</u> where B2 and B8 uses are excluded from the Mayor's target Urban Greening Factor ('UGF'), albeit supporting text states that such uses will still be expected to set out what measures they have taken to achieve greening on site.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/137	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						The Berkeley Group supports the principle of the requirement for development to contribute to nature recovery in Newham by protecting and enhancing biodiversity through a number of measures. All of these measures are supported...	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/138	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			1.d			however it is not clear what is meant by 'living building' elements at point 1 (d). If this is intended to be urban greening measures then the Berkeley Group would suggest that 'living building' is replaced with 'urban greening'. Proposed policy wording: 1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity. This will be achieved through: d. maximising ' ~~living building~~ ' <u>urban greening</u> elements as a key feature of the site and building design. Appropriate, site considered opportunities should be integral to the design of a development from the outset; and	A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation text to this policy clearly sets out what is meant by 'living-building' elements.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/139	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			5			The Berkeley Group notes at point 5 that reference is made to the possibility of a bespoke Newham Urban Greening Factor. On the basis that the Local Plan Refresh is now relatively advanced the Berkeley Group suggests that for continuity the London Plan Urban Greening Factor is adopted. There are few to no precedents in London of a bespoke UGF and at this stage it is not clear what it would entail. Proposed policy wording: 5. Development should meet the London Plan (2021) Urban Greening Factor ~~or a bespoke Newham Urban Greening Factor.~~	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5. Please see the new wording in Policy GWS3.

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/140	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			6			Point 6 includes the mitigation hierarchy for development affecting SINC. This is welcomed and as previously noted the Berkeley Group expects the mitigation hierarchy to be engaged in some form for all of their sites on the basis that remediation of these contaminated former gasworks site is likely to require the removal of all vegetation (topsoil) to facilitate their redevelopment.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/141	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			6			The Berkeley Group will work with the Council to ensure that reprovided SINC and/or biodiversity secures the maximum value and compensates for any loss or relocation of existing SINC.	Comment noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/142	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature			6			However, there would not appear to be any sites in Newham that could provide the conditions necessary to replicate the habitats that would be lost at Bromley by Bow and Beckton Gasworks, therefore offsite compensation may need to be located outside of the borough.	Comment noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/313	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[East Ham Gasworks] Summary of Proposed Amendments: Review of proposed SINC	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/334	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[East Ham Gasworks] A new SINC is proposed and the justification of this will require further assessment, particularly given the likely high levels of contamination across the site. Holistic site wide remediation is likely to be required.	Comment noted.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/036	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						The Proposals Map proposes new areas of Sites of Importance to Nature Conservation (SINC) to the south of and within the N8 SA8 Bridgewater Road allocation. As shown in the extract below [see p8 of Rep]:	Comment noted.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/037	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						Firstly, any designation of SINC within the allocation will be inconsistent with the parameters set out in the Bridgewater Triangle outline planning application (ref: 21/00403/OUT) and should therefore be amended to reflect the planning permission	A change to this policy approach has not been made. We did not consider this change to be necessary as the SINC designation at this site is an existing SINC which has been included in the 2022 SINC review. This section of the Bow Back Rivers is contiguous with other parts of the waterways. Please see the Newham SINC Review (2022) and the Policies Map.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. An assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the proposed SINC designation for this site remains in place. Please see the Newham SINC Review (2022).	Furthermore, the changes to the SINC designation appears to have been applied on the basis of the area containing existing planting but no justification to why these areas are of such an importance to be designated. The intention of designating land as SINC, is to protect and enhance sites that have important ecological and nature conservation value and not areas of existing vegetation in general. For these reasons, Stratford East recommend removing the SINC designations from this area.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-124/038	Stratford East London Partners LLP	Reg18-E-124

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-034	Swifts Local Network	Reg18-K-034/001	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		1. Development should contribute to nature				Please include clarification that biodiversity (and in later sections: protected and priority species & habitats) may include building-based biodiversity (e.g. bats, swifts, house sparrows, house martins etc.).	This wording change has been made. Please see Policy GWS3 which now makes reference to building-based biodiversity.
Reg18-K-034	Swifts Local Network	Reg18-K-034/002	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		1. Development should contribute to nature	1.d			Very supportive of this paragraph which implements national and London policy very well: "maximising 'living building' elements as a key feature of the site and building design. Appropriate, site considered opportunities should be integral to the design of a development from the outset".	Support noted.
Reg18-K-034	Swifts Local Network	Reg18-K-034/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		1. Development should contribute to nature				Please include clarification that "living building features" should be specified in accordance with best-practice guidance, e.g. swift bricks have guidance in BS 42021:2022 or from CIEEM to ensure suitable numbers and locations.	This wording change has been made. Please see Policy GWS3 which now makes reference to BS 42021:2022 / CIEEM .

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-034	Swifts Local Network	Reg18-K-034/005	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		2. Major development, and development in close				Please include clarification that protected species and habitats may include building-based biodiversity (e.g. bats, swifts, house sparrows, house martins etc.).	This wording change has been made. Please see Policy GWS3 which now makes reference to building-based biodiversity.
Reg18-K-034	Swifts Local Network	Reg18-K-034/006	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		2. Major development, and development in close				Please include clarification that "living building features" should be specified in accordance with best-practice guidance, e.g. swift bricks have guidance in BS 42021:2022 or from CIEEM to ensure suitable numbers and locations.	This wording change has been made. Please see Policy GWS3 which now makes reference to BS 42021:2022 / CIEEM .
Reg18-K-034	Swifts Local Network	Reg18-K-034/007	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		2. Major development, and development in close				Note a small typo here, should be "...protected and priority species..." rather than "...protected and a priority species...", to match the same phrase in clause 6.	This wording change has been made. Please see the new wording in GWS3.
Reg18-K-034	Swifts Local Network	Reg18-K-034/008	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature		6. Sites of Importance for Nature Conservation				Please include clarification that protected species and habitats may include building-based biodiversity (e.g. bats, swifts, house sparrows, house martins etc.).	This wording change has been made. Please see Policy GWS3 which now makes reference to building-based biodiversity.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-034	Swifts Local Network	Reg18-K-034/009	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature				3.182		Agree with this statement, homes can be a source of habitat creation (biodiverse walls & roofs, swift bricks etc.)	Support noted.
Reg18-K-034	Swifts Local Network	Reg18-K-034/010	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					GWS3.1	Strongly supportive of bird nesting bricks as a living building element - under British Standard BS 42021:2022 all bird nest bricks are to be the swift brick type as they are a universal nest brick which all cavity-nesting small bird species can and do safely use; only swift bricks are mentioned in national planning policy (NPPG 2019 Natural Environment paragraph 023) - therefore we believe this should specifically state "swift brick" rather than bird nesting brick to make this clear.	Support noted. This wording change has been made. Please see the new wording in the list of monitoring for Policy GWS3.
Reg18-K-034	Swifts Local Network	Reg18-K-034/011	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature					GWS3.1	It should be stated that swift bricks/ bird nest bricks (and potentially other items) should be installed in accordance with best-practice guidance. This is available (BS 42021:2022, and from CIEEM) and states appropriate numbers and locations for example; otherwise these measures may be installed inappropriately.	This wording change has been made. Please see Policy GWS3 which now makes reference to BS 42021:2022 / CIEEM .
Reg18-K-034	Swifts Local Network	Reg18-K-034/012	Green and Water Spaces	GWS3 Biodiversity, urban greening					GWS3.7	Agree with this clause.	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							and access to nature				
	This wording change has been made. Please see the new wording in the list of monitoring for Policy GWS3.	Should be "Urban Greening" rather than "Urban Green" I think.		Monitoring			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-K-034/013	Swifts Local Network	Reg18-K-034
	This wording change has been made. Please see the new wording in the evidence base list for Policy GWS3.	Urban Greening Factor guidance has been updated in 2023.		Evidence base			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-K-034/014	Swifts Local Network	Reg18-K-034
	A wording change has been made to add the Mayoral Document Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to the implementation text for Policy GWS3, in addition to including it in the list of evidence.	Also I believe this is an important Mayoral document that should be listed in the Evidence base: "Urban Greening for Biodiversity Net Gain: A Design Guide (2021)" (https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide)		Evidence base			GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-K-034/015	Swifts Local Network	Reg18-K-034

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-061	Thames 21	Reg18-T-061/004	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Thames21 is developing a bid to the Heritage Lottery fund that aims to improve the ecological condition and access points to the River Roding. The River Roding is London's third longest river and forms the boundary of Newham, and yet residents have very poor access to it. A commitment in this local plan to improve links to the River Roding would greatly support this lottery application. This should include improved linkages to tributaries and side channels of the Roding such as the Alders Brook and Back River, the latter of which has been buried and could be part deculverted and restored with improvements for biodiversity and access to green/blue spaces.	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements in Newham can be made. The Regulation 19 Local Plan has been updated to reflect the Green and Water Infrastructure Strategy (2024). The following neighbourhoods in the Local Plan highlight the importance of the River Roding and the potential to improve its ecological value and to improve access along it (N1, N12, N13 and N16). These neighbourhoods make reference to the Roding, Beam and Ingrebourne Catchment Partnership area and its focus on river and floodplain management, land management, land management and investment in the Roding, Beam and Ingrebourne.
Reg18-E-028	Thames Water	Reg18-E-028/024	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						There is also considered to be no justification for designating this area [Northern Lagoon area at Beckton STW] as SINC. The area was landscaped in accordance with the Lee Tunnel and Beckton STW extension scheme Landscape & Ecology Management Plan (natural regeneration area), but this will be new landscaping/habitat and will not have nature conservation value which justifies SINC designation. It is therefore considered that the Green Space, SINC and MOL	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS3.6 already provides a clear mitigation hierarchy to minimise development impacts on SINC:s: a. avoid damaging the significant ecological features of the site. b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site. c. deliver off-site compensation, in Newham, of better biodiversity value. d. where appropriate compensation is not possible, planning permission will be refused.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		designations should be removed from the Northern Lagoon Site.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was	There is also considered to be no justification for designating the northern lagoon site and the area to the north of the Beckton STW extension and south of Eric Clarke Lane as SINC/proposed SINC (see extract from policies map below with red arrow pointing to SINC) [see map in letter]. These areas have been allowed to re-generate naturally in accordance with the Lee Tunnel and Beckton STW extension scheme Landscape & Ecology Management Plan, but this is a new landscape/habitat and will not have nature conservation value which justifies SINC designation. It is therefore considered that the SINC designations should be removed from these areas.					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-E-028/031	Thames Water	Reg18-E-028

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022).										
	Support noted.	[Change it] The Woodland Trust supports this policy					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-013/006	Woodland Trust	Reg18-T-013
	This policy approach has now changed due to the need to better reflect the Environment Act 2021. Please see the new wording in Policy GWS3 which now reflects this suggested text amended.	[Change it] ...but suggests changing section 1a to better reflect the requirement for Biodiversity Net Gain as set out in section 4. Currently 1a says "... delivering the same or improved biodiversity value..." We recommend changing this to "... delivering improved biodiversity value..."					GWS3 Biodiversity, urban greening and access to nature	Green and Water Spaces	Reg18-T-013/007	Woodland Trust	Reg18-T-013

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-013	Woodland Trust	Reg18-T-013/008	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Change it] In addition, we recommend adding a reference to Local Nature Recovery Strategies (a new statutory requirement at GLA level) to the policy with new wording either at 1b iv or at section 2 "contributing to the emerging Local Nature Recovery Strategy."	This wording change has not been made. We did not consider this change to be appropriate as Newham does not currently have a Local Nature Recovery Strategy.
Reg18-T-001	Works in borough	Reg18-T-001/001	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] Overall supportive of this policy,	Support noted.
Reg18-T-001	Works in borough	Reg18-T-001/002	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] just requesting that swift bricks are installed in all developments as they are a universal nest brick for small bird species	A change to this policy approach has not been made. We did not think the requirement for swift bricks in all developments to be appropriate, however the implementation text to Policy GWS3 has been amended to make reference to swift bricks.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-001	Works in borough	Reg18-T-001/003	Green and Water Spaces	GWS3 Biodiversity, urban greening and access to nature						[Add to it] - a similar area (Wandsworth) has just proposed a modification (February 2023) to its new Local Plan (Reg. 19 stage) that is a good example of what would be appropriate for Newham: Main Modification ref. MM247 on page 132: "Policy L55 Biodiversity: '...Proposals should give consideration to the need for species to move between habitats and therefore seek to connect with existing green corridors where it is appropriate to do so. All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins... and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife.'"	A change to this policy approach has been made to give more prominence to living building elements and guides on swift bricks water spaces in this policy. Please see the new wording in Policy GWS1.

Reg18-E-070	Aston Mansfield	Reg18-E-070/097	Green and Water Spaces	GWS4 Trees and hedgerows						d. GWS4: Trees and Hedgerows - Would you keep, change or add something to this policy? <i>1. Development should protect and provide or help to deliver a network of improved tree stock and canopy cover with greater species and age diversity to ensure a healthy, balanced tree population. Over the plan period we will seek to deliver 20 per cent canopy cover, this will be achieved through:</i> <i>a. protecting all trees, including street trees;</i> <i>and</i> <i>b. seeking a net increase in trees on all development sites; and</i> <i>c. requiring an arboriculture report at the planning application stage for all developments with trees on or adjacent to the site</i> Object: Policy implies blanket protection upon all existing trees regardless of quality. Limiting protection to category A and B trees ensures the best trees are protected whilst requirement for net increase in Trees ensures overall improvement, even where a substantial number of lower quality trees are lost. Suggested change to wording: a. protecting all Category A and B trees,	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS4 seeks to protect trees and hedgerows, it also includes a clause to allow for the loss of a tree or hedgerow where sufficient evidence is provided to justify this approach. This is considered to be proportionate and balanced approach. The specification of a specific grade of tree is to be protected will be context sensitive, as such this level of detail will be considered at the point of planning application where appropriate.

										including street trees;	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/098	Green and Water Spaces	GWS4 Trees and hedgerows						3. <i>Development should:</i> <i>c. safeguard existing trees, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during demolition and during the construction phase; and</i> Suggested change to wording: <i>c. safeguard existing Category A and B trees, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during demolition and during the construction phase; and</i>	A change to this policy approach has not been made. We did not consider this change to be necessary as whilst Policy GWS4 seeks to protect trees and hedgerows, it also includes a clause to allow for the loss of a tree or hedgerow where sufficient evidence is provided to justify this approach. This is considered to be proportionate and balanced approach. The specification of a specific grade of tree is to be protected will be context sensitive, as such this level of detail will be considered at the point of planning application where appropriate.
Reg18-E-133	Climate You Change	Reg18-E-133/082	Green and Water Spaces	GWS4 Trees and hedgerows			2			P.225 GWS4 Trees and hedgerows 2. 'In exceptional circumstances, where sufficient evidence is provided to justify their loss, development which requires the removal of trees will only be supported where it: a. re-provides an adequate replacement based on the existing value of the trees removed; or b. provides suitable replacement trees on-site wherever possible; or c. makes appropriate mitigating financial contributions towards local tree planting provision.' Comment: Could it be mandatory that the criteria includes replacement (either directly or through	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS4: Trees and hedgerows, already requires, in the exceptional circumstances where loss is deemed acceptable, the re-provision of trees or hedgerows based on the existing value of the tree(s) and/or hedgerow(s). The value of lost trees will be established buy a CAVAT assessment. This is set out in the implementation text for Policy GWS4.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		financial provision) for trees accessed as having equal climate drawdown value to the lost trees at the time of replacement and with at least equal carbon sequestration value as time progresses?									
		P.225 Justification 3.188 Comment: Over the course of Newham's Local Plan, once all empty tree pits and all suitable areas within green spaces and parks have been planted, will the Council then be able to start the more costly and slower business of adding extra tree pits, especially where there is greater deficit?	3.188				GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-133/083	Climate You Change	Reg18-E-133
		We understand that the costs are much greater than planting in existing tree pits, hence asking whether there could be more canopy cover within our streets via new tree pits after planting has been exhausted in other spaces.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-133/084	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/085	Green and Water Spaces	GWS4 Trees and hedgerows				extra		P.225 We suggest adding another point under Justification: One of our members is concerned that trees are due to be cut down in one of the cemeteries (Woodgrange, which he has been told is privately run) and would like to ask whether Newham's Draft Local Plan could include policy notes on how the Council might intervene when there are risks to trees being felled, unless there are legitimate reasons.	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Parks team may be able to help. We have provided them with your comments. Information on Tree Preservation Orders in Newham can be found here: - https://www.newham.gov.uk/planning-development-conservation/conservation-areas-listed-buildings-newham/5 We have also provided the Park team with your comment.
Reg18-E-133	Climate You Change	Reg18-E-133/086	Green and Water Spaces	GWS4 Trees and hedgerows			GWS4 .3			P.227 GWS4.3 'Consideration needs to be given to species diversity when planting to ensure that should plants be affected by a pest or disease there will be variation within the species mitigating to spread and damage caused.' Could the diversity of trees and plants not just be spread across the borough but within individual areas, so that no new plantings have rows of just one or two kinds of species?	The Local Plan addresses this topic through policies GWS1, GWS3 and GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/221	Green and Water Spaces	GWS4 Trees and hedgerows						In ground trees – as many of these as possible! If in-ground planting areas are big enough to match the above ground canopy of one or more trees, then these could be female trees, to lessen the irritation of pollen from male trees during hay fever season. If there are any pollinating partners, there could be one or two fruit-bearing trees in the market!	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/223	Green and Water Spaces	GWS4 Trees and hedgerows						'Mini' food forests – created by including fruit bushes alongside fruit trees, where there is enough outdoor market space adequately set back from the road.	This wording change has been made. Please see the implementation text to Policy GWS4 which now makes reference to mini food forests.
Reg18-T-006	Community Group Representative	Reg18-T-006/012	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] Make it easier for people to plant trees & make improvements	Support noted. Policy GWS4 continues to support the delivery of trees.
Reg18-T-023	Community Group Representative	Reg18-T-023/004	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it]	Support noted.
Reg18-T-107	Community Group Representative	Reg18-T-107/004	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] Preserve the dock and the dock edge unless the proposals encourage local use. e.g. sports, children's activities on the grass, and engagement by introducing more gardens and green on and around the dock. As the area is increasingly built up, the loss of the open docks and green spaces will become more apparent.	Comment noted. Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/014	Green and Water Spaces	GWS4 Trees and hedgerows						"Adoption of a zero tolerance policy for loss of trees subject to TPOs with infractions penalised with further requirements for mitigation would go a long way to maintaining and protecting existing canopy cover in the borough. "	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4, as drafted, is designed to take a proportionate and deliverable approach to the protection of trees in Newham. The policy resists loss and already seeks re-provision for loss, which should only be in exceptional circumstances. Where re-provision is not possible the policy already seeks financial mitigation.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation. It is important to note that a key ambition of the Strategy is to bring together and coordinate initiatives taking place in different council teams and activities being led by those living in Newham.	A disconnect between local authority, agencies, and third-party contractors has, in our experience, led to a lack of joined up thinking with regards to biodiversity (such as damage to trees with TPOs by contractors working for the Highways Agency because these were not clearly indicated on their work order). Action to resolve this leaky data pipeline needs to be implemented if any future policies for biodiversity and ecology are to be successful. Are changes to designations automatically made available to all relevant parties? If not, is there a way that this can be implemented to avoid unintentionally working at cross-purposes?					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-K-019/015	Gasworks Dock Partnership - Cody Dock	Reg18-K-019

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/016	Green and Water Spaces	GWS4 Trees and hedgerows			3. Development should :			Canopy cover target should be set at a minimum level of 20%. Maintaining 15% canopy cover does not go far enough when considering the rate of climate change effects coupled with growing pressures on green spaces by increased population. Propose a measure of targeted year-on-year increases so that measures can be taken to ensure that canopy cover targets are met.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4 already provides a clear requirement for replacement trees, where their loss is justified, and detailed guidance on suitable planting conditions and maintenance. The approach Policy GWS4 takes is to maximise tree provision, and therein canopy cover. The policy continues to have an ambition to deliver 20 per cent canopy cover over the Plan period, and not the 15 per cent which is being suggested here. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.
Reg18-K-019	Gasworks Dock Partnership - Cody Dock	Reg18-K-019/017	Green and Water Spaces	GWS4 Trees and hedgerows					Monitoring	"Adoption of a zero tolerance policy for loss of trees subject to TPOs with infractions penalised with further requirements for mitigation." "	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4, as drafted, is designed to take a proportionate and deliverable approach to the protection of trees in Newham. The policy resists loss and already seeks re-provision for loss, which should only be in exceptional circumstances. Where re-provision is not possible the policy already seeks financial mitigation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/023	Green and Water Spaces	GWS4 Trees and hedgerows						[However, there are several blanket restrictions in this chapter including] [...] protection of all trees (Policy GWS4).[Such restrictions can, especially on smaller sites, limit the likelihood of infill housing development to come forward. These policies should be amended to consider the quality of existing green spaces and infrastructure, against the planning benefit of a scheme, including any replacement green infrastructure.]	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4 does provide sufficient flexibility. Given Newham's low canopy cover, and the benefits which trees bring to the natural environment and the positive impact on people's health and wellbeing, it is imperative we seek to protect trees wherever possible.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/008.b	Green and Water Spaces	GWS4 Trees and hedgerows						We would welcome joint working on urban tree planting to help achieve the Mayor of London's target for a 10% net gain in tree canopy cover by 2050.	Support noted for joint working on urban tree planting to help achieve the Mayor of London's target for a 10% net gain in tree canopy cover by 2050.
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/017	Green and Water Spaces	GWS4 Trees and hedgerows						GWS4: Trees and Hedgerows LPG welcomes the commitment to increasing the tree stock and canopy cover in the borough.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/018	Green and Water Spaces	GWS4 Trees and hedgerows			3			However, urban tree-planting initiatives, whilst well-intentioned, can often result in trees being planted within existing parks and landscapes where they disrupt historic planting schemes and create a sense of enclosure by breaking up previously open spaces. Whilst tree planting can of course be highly beneficial, the environmental and social impacts are maximised when areas of hardstanding are selected. As such we recommend the council add an additional sentence in point 3 to note that development should ‘prioritise planting in areas of hardstanding and ensure that any planting in open spaces and historic landscapes is appropriate and pays due consideration to the existing character of the space.’	This policy approach has now changed due to ensure tree planting does not disrupt historic planting schemes, as suggested. Please see the new wording in Policy GWS4.3.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/120	Green and Water Spaces	GWS4 Trees and hedgerows					Evidence base	It would be helpful to add to the evidence base Natural England Green Infrastructure Framework (2023); COP15 Global Biodiversity Framework; Use of the evidence on the GLA GIS databases and the Natural England data bases (including urban tree canopy standard).	This wording change has been made. Please see the new wording in the evidence base list for Policy GWS4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/024.a	Green and Water Spaces	GWS4 Trees and hedgerows						2.4 Trees and Hedgerows We are supportive of this policy which sets out measures to protect existing trees.	Support noted.
Reg18-E-144	Natural England	Reg18-E-144/024.b	Green and Water Spaces	GWS4 Trees and hedgerows						2.4 Trees and Hedgerows We recommend the Policy includes a requirement for development proposals to provide a minimum canopy cover, minimum like for like replacement or similar provision to ensure tree planting at an appropriate level, and a requirement for the provision of suitable growing conditions for new trees.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4 already provides a clear requirement for replacement trees, where their loss is justified, and detailed guidance on suitable planting conditions and maintenance. The approach Policy GWS4 takes is to maximise tree provision, and therein canopy cover. The policy has an ambition to deliver 20 per cent canopy cover over the Plan period. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.
Reg18-E-144	Natural England	Reg18-E-144/025	Green and Water Spaces	GWS4 Trees and hedgerows						[2.4 Trees and Hedgerows] Whilst we are supportive of the use of native trees it is also important to ensure species are suitable for the changing climate and offer resilience to pests and disease through species diversity across the tree inventory of a development site and strategically.	This wording change has been made. Please see the new wording in the implementation text for Policy GWS4.
Reg18-E-144	Natural England	Reg18-E-144/026	Green and Water Spaces	GWS4 Trees and hedgerows						[2.4 Trees and Hedgerows]Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced	This wording change has been made. Please see the new wording for the implementation text for Policy GWS4.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		standing advice on ancient woodland, ancient and veteran trees.									
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Change] Uncap tree pits that you tarmacad in the thousands in the last 10 years					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-Ap-001/102	Plaistow Assembly	Reg18-Ap-001
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	Trees and hedges This is why you say in your hedges and trees policy that the developers must have a plan for the initial few years of how the hedges and trees will be maintained, and that in the beginning, routine visits to weed must be taken. This is true, but it is really important that you include in the policy that this is done by handweeding, NOT by weedkillers. In the Olympic Park, I think they routinely kill weeds with weedkillers, including the weeds next to the waterways. But the most common weedkillers are extremely toxic to aquatic life. It is very important that you put in your policies that weedkillers and pesticides are not permitted.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-027/022	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-004	Resident	Reg18-E-004/004	Green and Water Spaces	GWS4 Trees and hedgerows						The endless pollarding needs to stop too. We need shade in ever heating climate. Pollarded trees don't shade	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.
Reg18-T-011	Resident	Reg18-T-011/021	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-026	Resident	Reg18-T-026/020	Green and Water Spaces	GWS4 Trees and hedgerows						Give all cemeteries tree protection orders. And if they cut trees they should replace them. Seeing so many trees being cut without reasons in cemeteries. They end up putting a grave instead of it. So bad for the climate and our health	Comment noted. Policy GWS4 seeks to protect trees and deliver enhanced canopy cover in Newham. The importance of this approach is evidenced in Newham's Green and Water Infrastructure Strategy (2024).
Reg18-T-034	Resident	Reg18-T-034/047	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] Have a quota of adding trees to local high streets and areas year on year.	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.
Reg18-T-043	Resident	Reg18-T-043/008	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] Unfortunately at the moment area around Canning Town station is very 'concrete'. There are a few trees but those are very 'young'. I would hope for more mature trees. And not just one tree every couple meters but rather a nice bunch of those here and there.	Comment noted. Policy GWS4 seeks to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-045	Resident	Reg18-T-045/005	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] Plant more hedges	Comment noted. Policy GWS4 seeks to protect and deliver a network of improved network of trees and hedgerows. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing green spaces and set out where future improvements in Newham can be made.
Reg18-T-045	Resident	Reg18-T-045/006	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] and stop cutting hedges down.	Comment noted. Policy GWS4 seeks to protect and deliver a network of improved network of hedgerows. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing green spaces and set out where future improvements in Newham can be made.
Reg18-T-047	Resident	Reg18-T-047/006	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it]	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change it] The Nursery Site in West Ham Park should be returned to Green Space and trees planted.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-048/014	Resident	Reg18-T-048

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy has not been made. We do not consider this change to be appropriate as Policy GWS4 continues to seek to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.	[Change it] In addition, trees that the Council have cut down or removed on the public roads should be replaced, as many trees have been lost.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-048/015	Resident	Reg18-T-048

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Add to it] Nothing					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-050/004	Resident	Reg18-T-050
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance	[Change it] Do not build housing in westham.park.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-051/008	Resident	Reg18-T-051

Comment Response	social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		[Change it] extend play spaces					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-051/009	Resident	Reg18-T-051

This policy approach has now changed due to the need to ensure the Local Plan site allocations are setting out the play space required to support the borough's growth. Newham's Green and Water Infrastructure Strategy (2024) has reviewed the number and quality of the borough's play spaces. It is recognised that Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space. Local Plan Policy GWS5: Play and informal recreation for all ages seeks to protect and maximise opportunities for play space. For more detailed information, please see Newham's Green and Water Strategy

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	(2024) which is published alongside the Regulation 19 consultation.										
	The Local Plan addresses this topic through Policy GW1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Change it] extend [play spaces] city farms					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-051/010	Resident	Reg18-T-051
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key	[Change it] extend [play spaces city farms and] green spaces					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-051/011	Resident	Reg18-T-051

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.										
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and								Reg18-T-053/007	Resident	Reg18-T-053

Comment Response	environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-056	Resident	Reg18-T-056/004	Green and Water Spaces	GWS4 Trees and hedgerows						[Change it] At the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. The Newham population is expected to increase by 2038 by c.100,000 people and so there is the requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. However, as you may be aware there are currently plans by the Corporation of London to sell and develop a portion (the "Nursery Site") of the Grade 2 listed West Ham Park to build blocks of flats. As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less. Therefore, we need the local plan to properly protect our local parks. Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland. My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	[Keep it]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-067/005	Resident	Reg18-T-067

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/016	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] Hedgerows are so few that we sadly don't have the tiny birds that live in them around any more. Plashet park had a row that was ideal as a windbreaker and had so many robins and tits chirping away. Suddenly one day, they were gone. What thought went into that? Unfortunately many other places have suffered the same. Thought has to be long term, not a quick fix solution and one must always take into consideration the second and third order effects, the unintended consequences. Birds, small animals and insects that are deprived of their homes just die - there is nowhere else for them to go. Maybe the people making the plans just think they'll move and live somewhere else, or don't care what happens to them. Less big talk, more big action.	Comment noted. Policy GWS4 seeks to protect and deliver a network of improved network of hedgerows. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing green spaces and set out where future improvements in Newham can be made.
Reg18-T-069	Resident	Reg18-T-069/017	Green and Water Spaces	GWS4 Trees and hedgerows						[Add to it] The same applies to trees. A lot need to be replaces with careful attention to the surrounding area, the natural habitats. Nature knows what to do and for some urban areas just needs some help along the way and not necessarily putting the humans first. Surely there must be some spaces where trees and hedgerows can just grow as they want and other plants and fauna will come along too.	Comment noted. Policy GWS4 seeks to protect and deliver a network of improved network of trees and hedgerows. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing green spaces and set out where future improvements in Newham can be made.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.	[Add to it] I feel there is so much focus on building new homes. Yes, there is a long housing waiting list but more housing will attract new people to the areas and all these people will not only need the usual infrastructure - expensive for the council, but will detract from the limited land being allocated to nature and for the already existing people in the borough to enjoy nature. A building can house x amount of new people (from other boroughs or elsewhere)and be appreciated as homes by them, but a new nature reserve, large public park with sports and childrens areas for play, gardens, trees, bushes, hedgerows will be appreciated by many.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-069/018	Resident	Reg18-T-069

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	[Add to it]We should not be stinting as nature enjoyment is clearly linked to health and mental health. This decreases spending in health. Prevention is a key concept in green biodiverse natural areas.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-069/019	Resident	Reg18-T-069
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024). Please see the new wording in the neighbourhood policies and relevant site allocations which highlight where improvements to the A13 and Greenway can be made. Please also see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Add to it] More trees along the A13 and the Greenway to improve the air quality					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-071/011	Resident	Reg18-T-071

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add to it] The nursery area of West Ham park which has remained dormant for a few years should be reestablished as public open space, as it was in the beginning I understand. It should under no circumstances be used for housing. You say the borough needs more open green public spaces and this is a simple solution to add a large area to an established park that has existing provisions to maintain it in excellent order at no cost to the council. The latter being a bonus for the council in these hard times.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-094/004	Resident	Reg18-T-094

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. Policy GWS4 seeks to protect trees and deliver enhanced canopy cover in Newham. The importance of this approach is evidenced in Newham's Green and Water Infrastructure Strategy (2024).	[Keep it] Stop chopping down are trees [originally: GWS3 Biodiversity, urban greening and access to nature]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-108/013	Resident	Reg18-T-108
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key	[Keep it] [Stop chopping down are trees] and replacing our greens with houses [originally: GWS3 Biodiversity, urban greening and access to nature]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-108/014	Resident	Reg18-T-108

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.										
	Support noted.	[Keep it]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-108/015	Resident	Reg18-T-108
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and	[Add to it] They have become a cesspit of public drunkards defecating on them					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-109/056	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	The Local Plan addresses this topic through Policy GWS4. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Add to it] It would be great if we could organise voluntary groups to plant trees in the area. Such community events would raise awareness for climate emergency and help residents socialise and feel useful as well					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-116/008	Resident	Reg18-T-116
	Support noted.	[Keep it]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-T-126/023	Resident	Reg18-T-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	The Berkeley Group recognises the importance of ensuring a healthy, balanced tree population which involves protecting and providing or helping to deliver a network of improved tree stock.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-136/143	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS4 already provides a clear mitigation hierarchy to the loss of trees where sufficient evidence is provided to justify their loss. Given Newham's low canopy cover, and the benefits which trees bring to the natural environment and the positive impact on people's health and wellbeing, it is imperative we seek to protect trees wherever possible. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped the borough's existing trees and set out where future improvements in Newham can be made.	In line with our comments on Point 6 of the Biodiversity policy it should be noted that in the case of many of the Berkeley Group's sites it is likely that there is the potential for any existing trees may need to be removed to facilitate remediation of these sites. The criteria for justifying any loss of trees outlined at point 2 is therefore welcomed and remediation of these sites should be considered exceptional circumstances and the requirement of other planning policy objectives weighed in the balance with any proposed removal of trees. Proposed policy wording: 2. In exceptional circumstances, where sufficient evidence is provided to justify their loss, development which requires the removal of trees will only be supported where it: a. re-provides an adequate replacement based on the existing value of the trees removed; or b. provides suitable replacement trees on-site wherever possible; or c. makes appropriate mitigating financial contributions towards local tree planting provision.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-136/144	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<u>The remediation of contaminated sites should represent exceptional circumstances.</u>									
	Comment noted.	A Landscape Strategy will be included within any planning application confirming the acceptability of replacement and new trees.					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-E-136/145	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the planting of specific street trees, is not provided in the Local Plan, nor is it something the Local Plan can deliver. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation. We have provided the Park team with your comments regarding the desire for trees on Morely Road. Our colleagues in the Park department are able to help should you have any further concerns related to a particular request for regarding street trees.	Masterplan: Restoration of Vegetation on Morley Road [see map on rep As-001n]. Reason 1: Precedent. Morley Road is a typical late Victorian street development of which trees would have been an integral part [1]. There is evident in both historical photographs and modern photographs of all the surrounding identical streets. [see photographs in rep As-001n]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-As-001/096	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the planting of specific street trees, is not provided in the Local Plan, nor is it something the Local Plan can deliver. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation. We have provided the Park team with your comments regarding the desire for trees on Morely Road. Our colleagues in the Parks department are able to help should you have any further concerns related to a particular request for regarding street trees.	Masterplan: Restoration of Vegetation on Morley Road. Reason 2. Negative effects of current state. Health problems: intensified urban heat island effect. Increased temperature. Complete absence of any natural shade. Urban scape hostile to the environment, wildlife and the humand condition [2]. Socioeconomic problems: Barren, antisocial, crime-inducing street with depressed property values [3] Environment problems: Indirect contribution to global warming. Increased likelihood of drain overflow and surface water flooding [4] [see photograph on rep As-001n]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-As-001/097	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the planting of specific street trees, is not provided in the Local Plan, nor is it something the Local Plan can deliver. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation. We have provided the Park team with your comments regarding the desire for trees on Morely Road. Our colleagues in the Parks department are able to help should you have any further concerns related to a particular request for regarding street trees.	Masterplan: Restoration of Vegetation on Morley Road. Solution 1: Macro Blueprint [see map and diagrams in rep As-001n and As-001o]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-As-001/098	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the planting of specific street trees, is not provided in the Local Plan, nor is it something the Local Plan can deliver. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation. We have provided the Park team with your comments regarding the desire for trees on Morely Road. Our colleagues in the Parks department are able to help should you have any further concerns related to a particular request for regarding street trees.	Masterplan: Restoration of Vegetation on Morley Road. Solution 2: Micro Blueprint [see diagrams in As-001o]					GWS4 Trees and hedgerows	Green and Water Spaces	Reg18-As-001/099	Stratford and West Ham Assembly	Reg18-As-001

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-013	Woodland Trust	Reg18-T-013/009	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] The Woodland Trust strongly supports this excellent policy, which provides a comprehensive set of measures to protect and enhance Newham's woods and trees through the planning system.	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/010	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] In particular, we welcome the setting of a 20% canopy cover target in section 1;	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/011	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] In particular, we welcome [the setting of a 20% canopy cover target in section 1;] the presumption to retain trees with robust replacement requirements (including CAVAT assessment) where trees are unavoidably lost in section 2;	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/012	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] In particular, we welcome [the setting of a 20% canopy cover target in section 1; the presumption to retain trees with robust replacement requirements (including CAVAT assessment) where trees are unavoidably lost in section 2;] and the encouragement of new trees in section 3.	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/013	Green and Water Spaces	GWS4 Trees and hedgerows						[Keep it] We welcome the policy in support of appropriate species and UK sourcing in section 3 and in note GWS4.3 D.	Support noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/099	Green and Water Spaces	GWS5 Play and information recreation for all ages						e. GWS5: Play and Informal Recreation for All Ages - Would you keep, change or add something to this policy? Aims of the Policy Supported .	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		c. reducing the harm caused by poor air quality through the favourable location of play and informal recreation facilities to minimise exposure to pollutants and careful layout and choice of soft landscaping. Suggested change to wording: To provide more flexibility to ensure play space can be provided where sites are located close to busy or congested roads. c. reducing the harm caused by poor air quality through the favourable location of play and informal recreation facilities or through the provision of appropriate mitigation to minimise exposure to pollutants and careful layout and choice of soft landscaping					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-E-070/100	Aston Mansfield	Reg18-E-070
	Unfortunately it was not clear what change you wanted to make to this part of the Plan.	P.228 GWS5 Play and informal recreation for all ages – Justification 3.913 [unclear]	3.913	GWS5			GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-E-133/087	Climate You Change	Reg18-E-133

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/088	Green and Water Spaces	GWS5 Play and information recreation for all ages					GWS5.2	P.230 Implementation - GWS5.2 Social Seating – ‘allowing people to speak, circular designs achieve this well’ Comment: We ask that this be made from recycled materials, such as recycled plastic seating.	The Local Plan addresses this topic through Policy GWS1 and Policy GWS5. However, it cannot deliver the change you have requested. We did not consider this change to be necessary as this level of detail, specifying use of recycled plastic, is not provided in the Local Plan.
Reg18-E-133	Climate You Change	Reg18-E-133/089	Green and Water Spaces	GWS5 Play and information recreation for all ages				3.193		Climate Emergency, page 232 [actually page 228]: ‘Well-designed, environmentally friendly... playground equipment should be an available resource for everyone’s benefit’ Comment: We ask that existing play equipment is first repaired, upcycled and painted before new equipment is bought.	The Local Plan addresses this topic through Policy GWS5. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-T-023	Community Group Representative	Reg18-T-023/005	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-107	Community Group Representative	Reg18-T-107/005	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] More activities for children required, especially in the open green spaces.	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS1 continues provide an opportunity for green space to deliver local scale facilities which improve the usability and enjoyment of green space, as set out in Policy GWS1.3.
Reg18-T-107	Community Group Representative	Reg18-T-107/006	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Tai-chi, yoga, etc for adults would be a great idea. Mount Anvil ran one in 2021 on RVS and it was a great success. These events build communities.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Local Plan can protect green space which people can through Local Plan Policy GWS1. However, the Local Plan cannot stipulate the types of activities which take place in a green space as this sits beyond the control of planning. However, Policy GWS1 does seek to encourage the improved functionality of green spaces in Newham. This is an ambition reflected in Newham's Green and Water Strategy (2024) which is also being consulted on at Regulation 19.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. The Local Plan cannot deliver the change you have requested. However, it should be noted there are 5 dogs on leads control orders in Newham, please see here for further information: https://www.newham.gov.uk/public-health-safety/dog-care-control . Here is list of the streets, play areas, parks and other open spaces where you must follow orders to control dog movements and waste: https://www.newham.gov.uk/downloads/file/103/here-is-list-of-the-streets-play-areas-parks-and-other-open-spaces-where-the-orders-apply- . We have also provided the Parks team with your comments.	[Change] [Revise dog signage in parks] leads on playgrounds					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-Ap-001/101	Plaistow Assembly	Reg18-Ap-001
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to highlight the importance of the multi-functionality of open space and seek to protect and improve Newham's green assets. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	More green areas for exercise, vitamin d, enjoyment of the outdoors, interest in nature is. Learn why this is important disease prevention too					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-E-002/030	Resident	Reg18-E-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.	[Change it] Be bolder. The playgrounds across Newham are awful compared to other neighbouring boroughs.					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-002/070	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.	[Change it] Plashet Park playground is a disgrace.					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-002/071	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published						GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-002/072	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	alongside the Local Plan Regulation 19 consultation.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS5 already sets out that new play and informal recreation facilities should be designed to meet the needs of Newham's population, be inclusive, accessible and safe, through the co-production with local adults, children and young people, parents, and carers on the design of new provision early on in the development of an application	[Change it] and consult with local residents and parents on plans.					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-002/073	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change it] I oppose the proposed building of flats on the Nursery site in West Ham Park as more public open space is absolutely crucial given the numbers of people who already use the park. The projected forecast of up to 100,000 new residents in Newham by 2038 means it's absolutely crucial to make that area public open space. [Originally made under GWS5]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-032/005	Resident	Reg18-T-032

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Support noted.	[Keep it]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-040/002	Resident	Reg18-T-040
	Support noted.	[Keep it]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-045/007	Resident	Reg18-T-045

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-047	Resident	Reg18-T-047/007	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Keep it]	Support noted.
Reg18-T-050	Resident	Reg18-T-050/005	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Nothing	Support noted.
Reg18-T-051	Resident	Reg18-T-051/012	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Change it] Extend play [and green] spaces .	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.						GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-051/013	Resident	Reg18-T-051

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Change it] Do not build any housing in westham park					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-051/014	Resident	Reg18-T-051

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.						GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-053/008	Resident	Reg18-T-053

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-056	Resident	Reg18-T-056/005	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Change it] At the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. The Newham population is expected to increase by 2038 by c.100,000 people and so there is the requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space. However, as you may be aware there are currently plans by the Corporation of London to sell and develop a portion (the "Nursery Site") of the Grade 2 listed West Ham Park to build blocks of flats. As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less. Therefore, we need the local plan to properly protect our local parks. Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland. My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-066	Resident	Reg18-T-066/005	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Children need lots of recreational space to grow and enjoy playing. They need to explore and expand, have adventure and use their imagination and be creative in play and not be restricted to tiny patches of green space.	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.

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Reg18-T-067	Resident	Reg18-T-067/006	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Children and adults need more open space for the children to be able to play in and the adults to relax in as a momentary escape from the condensed housing in which they're living.	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.

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Reg18-T-069	Resident	Reg18-T-069/020	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] There is insufficient play area as a whole in the borough. Adults, as well as children and young people need wide open natural spaces to play (as well as formal playing fields, courts and play furniture areas) to run and cycle and be inventive and hide and while away a lazy afternoon in the long grasses. To walk and wonder and stop and gaze and appreciate. To laugh and enjoy without feeling overcrowded in a cramped space.	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS1 continues provide an opportunity for green space to deliver local scale facilities which improve the usability and enjoyment of green space, as set out in Policy GWS1.3.	[Add to it] There are many old disintegrating buildings and broken up asphalt that could be repurposed for different sports and other activities, wherever they are. If there is a special area for archery, basket ball, skateboarding, bowls, tennis, football etc etc etc - people will travel to them.					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-069/021	Resident	Reg18-T-069

Reg18-T-069	Resident	Reg18-T-069/023	Green and Water Spaces	GWS5 Play and information recreation for all ages							[Add to it] I know we are besieged with anti social behaviour - fly tipping, drug dealing corners, dodgy areas - but does everyone else have to be curtailed? I know these are big issues and the hope is that beautifying the area will immediately change the people with such behaviours to change their ways and be proud of their lovely surrounds.	Support noted for the desire to beautify our borough, the intention of the policies in this chapter is to improve and enhance our green and water spaces. Regarding anti social behaviour the Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Council take all reports of ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able

											to help. We have also provided them with your comments. Regarding cleanliness, the Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/027	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] More recreation facilities in lieu of fast food outlets round the corner from the schools! Instead of going in for a bag of chips, toasted nuts and seeds available for a decent price at the recreational facility from a plant based, no additives vending machine or vendor!	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS1 continues provide an opportunity for green space to deliver local scale facilities which improve the usability and enjoyment of green space, as set out in Policy GWS1.3.
Reg18-T-076	Resident	Reg18-T-076/004	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Keep it]	Support noted.
Reg18-T-082	Resident	Reg18-T-082/015	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Add more activities in green spaces	A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS1 continues provide an opportunity for green space to deliver local scale facilities which improve the usability and enjoyment of green space, as set out in Policy GWS1.3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/016	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Add [more activities in green spaces and] more benched areas	Comment noted. Policy GWS1 and GWS2 already highlight the importance of seating in their implementation text. The need for seating comes under the policy points which seek high quality green and play spaces.
Reg18-T-085	Resident	Reg18-T-085/004	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] Newham has quite a lot of playgrounds for younger children but less facilities for those who are a bit older - we need more MUGAs and how about skate areas and bike tracks?	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS5 and Policy SI3 set out the requirement for play and recreation space for facilities which older children may wish to use. These policies have been informed by the Green and Water Infrastructure Strategy (2024) and the Built Leisure Needs Assessment (2024). Furthermore, the neighbourhood policies and site allocations now includes, where appropriate, the need for play and sport and recreation facilities.

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	[Add to it] The nursery area of West Ham park which has remained dormant for a few years should be reestablished as public open space, as it was in the beginning I understand. It should under no circumstances be used for housing. You say the borough needs more open green public spaces and this is a simple solution to add a large area to an established park that has existing provisions to maintain it in excellent order at no cost to the council. The latter being a bonus for the council in these hard times.					GWSS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-094/005	Resident	Reg18-T-094

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach	Improvements on the playgrounds, adding CCTV on the Hidden areas that prostituting and drug dealing takes place. [Originally Submitted on Section 1: All about Newham.]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-099/002	Resident	Reg18-T-099

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	Support noted.	[Keep it]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-105/024	Resident	Reg18-T-105
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to highlight the importance of the multi-functionality of open space and seek to protect and improve Newham's green assets. Please see the Green and Water	[Add to it] More health and safety in the parks.					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-108/016	Resident	Reg18-T-108

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.										
	A change to this policy approach has not been made. The Local Plan cannot deliver the change you have requested. However, it should be noted there are 5 dogs on leads control orders in Newham, please see here for further information: https://www.newham.gov.uk/public-health-safety/dog-care-control . Here is list of the streets, play areas, parks and other open spaces where you must follow orders to control dog movements and waste: https://www.newham.gov.uk/downloads/file/103/here-is-list-of-the-streets-play-areas-parks-and-other-open-spaces-where-the-orders-apply- . We have also provided the Parks team with your comments.	[Add to it] All dogs should be on leads					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-108/017	Resident	Reg18-T-108
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Polices D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, The Local Plan cannot deliver the change you have requested. The Council's Community Safety Enforcement department	[Add to it] and protection from unsavoury characters					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-108/018	Resident	Reg18-T-108

Comment Response	regularly collect and review data around ASB in the borough, responding to hotspot locations through targeted and focused operations in conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach	[Add to it] Lots of drug use there sadly council oblivious					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-109/057	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	Support noted.	[Keep it]					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-116/009	Resident	Reg18-T-116
	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	[Add to it] provide cafe [and reopen toilet facilities] in Little Ilford park					GWS5 Play and information recreation for all ages	Green and Water Spaces	Reg18-T-123/012	Resident	Reg18-T-123

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-123	Resident	Reg18-T-123/013	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] reopen toilet facilities in Little Ilford park	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-T-126	Resident	Reg18-T-126/024	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Keep it]	Support noted.
Reg18-T-013	Woodland Trust	Reg18-T-013/014	Green and Water Spaces	GWS5 Play and information recreation for all ages						[Add to it] The Woodland Trust suggests adding "including natural greenspace" at the end of section 2c, to better reflect the policy in support of access to nature in GWS1.	This wording change has not been made. We did not consider this change to be necessary. However, the policy has changed as it needed to be clearer about its intent which is to reduce the harm cause by poor air quality. Please see the new wording in GWS5.2c.
Reg18-E-148	City of London	Reg18-E-148/019	Design	D10 Designated and non-designated heritage assets					D10.4	In this context, City of London would ensure that the starting point for any redevelopment of the Site is to understand the historical context of the [West Ham Nursery Site] Site and its surrounds, and the impact that development could have upon West Ham Park, as a Grade II Registered Park and Garden.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area

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	of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.										
	Comment noted. This consultation cannot prejudice future development management decision, where all available evidence and planning matters will be taken into consideration.	D10.2 an D10.3					D10 Designated and non-designated heritage assets	Design	Reg18-E-148/021	City of London	Reg18-E-148

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	"Regardless of its current designation, the nursery site on West Ham Park, should be given special consideration as a designated or non-designated heritage asset. This land was originally designated as a green space for public access as part of the sale of West Ham Park to the City of London Corporation. It is also of historical importance given its link to the Fothergill estate. The London Borough of Newham should strongly resist any attempt to re-designate this land as anything other than green space. Its use for greenhouses for growing bedding plants should only ever have been a temporary measure. The corporation's decision to let the greenhouses fall into disrepair then use this fact to argue the site is possibly brownfield, able to be developed, transgresses basic rules of fairness. This site could be a major asset to the community and should be returned to park land. "					D10 Designated and non-designated heritage assets	Design	Reg18-K-029/001	Resident	Reg18-K-029

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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. The heritage significance of the site would need to be addressed in any future planning application and would be assessed against the development plan which seeks to protect heritage assets and their setting from harm, unless material considerations and substantial public benefit indicate otherwise.	West Ham Park has a Grade II listed status, the "Nursery Site" proposed by the Corporation of London is within the boundary of the land protected by this status.					D10 Designated and non-designated heritage assets	Design	Reg18-K-052/001	Resident	Reg18-K-052

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). The Local Plan does not consider this to be a suitable site for development since the proposed site is, in its entirety, a SINC and as such it is not being designated as a Site Allocation. It should be noted that this would	Limited Value of Current Green Space Designation					N11 Beckton	Green and Water Spaces	Reg18-E-099/015	Beckton Alp Real Estate Ltd	Reg18-E-099

Comment Response		not preclude an application for development coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Reg18-E-148	City of London	Reg18-E-148/001	Green and Water Spaces	N9 West Ham						West Ham Park Nursery The Site extends to approximately 1.2ha and is located to the north-eastern corner of West Ham Park. A site location plan is included at Appendix 1. The Site is owned by City of London and is currently inaccessible to the public. It contains a number of derelict glass house structures and land that became vacant in 2016. The Site was previously used for growing flowers and other plants that would have been used to decorate parks and other open spaces located within the City of London. The nursery was not open to the public and did not operate as a retail outlet. The Site also includes two residential cottages which are located at the northern edge of the Site, leased by City of London. Although the Site has been maintained by the City of London, the legacy use of the Site and its function has ceased. The Site as it stands is not currently fit for continuation of its original use and is not capable of providing any public benefit.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Local Plan seeks to protect green space through Policy GWS1, this approach remains the same at Regulation 19. Policy GWS1 protects all existing open green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to	More generally, the Plan should designate all key public parks and open spaces as Local Green Space to ensure they are protected into the future.					N9 West Ham	Green and Water Spaces	Reg18-E-040/023	CPRE	Reg18-E-040

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	meet the additional demand from new development.										
	A change to this policy approach has not been made. We did not consider this change to be necessary, please see the Newham's MOL Review 2024, published in conjunction with the Regulation 19 Local Plan consultation.	The failure to undertake a comprehensive MOL review prior to the publication of the R18 plan has also meant that the plan fails to fully and positively consider the full extent of potential development sites within the LBN and limits the ability of the LBN to deliver the required housing.						Green and Water Spaces	Reg18-E-070/005	Aston Mansfield	Reg18-E-070

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	A change to this policy approach has not been made. We did not consider this change to be necessary as London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.	4.10 It is noted that this the site allocations will be reviewed following the completion of the Metropolitan Open Land review in the Green Infrastructure Study, which will identify whether there is likely to be a case for exceptional circumstances for changes to the Metropolitan Open Land boundary. This is expected prior to the Regulation 19 consultation (currently planned for Winter 2023). 4.11 As designated MOL it is understood that Lady Trower Playing fields will be subject to a future review, prior to being considered for allocation. As such, it is considered that the current R18 plan, which identifies housing allocation sites, not been positively prepared because a full review of housing land (i.e., including the MOL review) has not yet been undertaken to support and inform it, particularly where; o Newham only has a five-year land supply of 2.69 years. o Newham does not have sufficient identified housing capacity. o Newham does not have the level of identified deliverable sites to meet future expected demand.						Green and Water Spaces	Reg18-E-070/024	Aston Mansfield	Reg18-E-070

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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set								Reg18-E-070/025	Aston Mansfield	Reg18-E-070

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set	4.13 The review provides a basic description of each of the LBNs SINC's, with Lady Trower Playing Fields described as follows <i>"These abandoned playing fields are now an extensive area of scrub, rough grassland and scattered Trees which are occasionally grazed by horses"</i>. 4.14 Aston Mansfield have confirmed that the horses are believed to belong to gypsies and travellers and their grazing does not represent an established use. It is the subject of legal action to have the animals removed in conjunction with Animal Welfare organisations.		Evidence base: SINC review				Green and Water Spaces	Reg18-E-070/026	Aston Mansfield	Reg18-E-070

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set	4.17 Paragraph 8.6.2 of the London Plan states that "The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks". 4.18 The review fails to adequately assess the SINC's along the lines of paragraph 8.6.2 particularly in terms of the contribution they make to wider ecological networks.		Evidence base: SINC review				Green and Water Spaces	Reg18-E-070/028	Aston Mansfield	Reg18-E-070

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Reg18-E-070	Aston Mansfield	Reg18-E-070/029	Green and Water Spaces				Evidence base: Green and Water Spaces Strategy			Interim Green and Water Spaces Strategy (2022) 4.19 Figure 1.1 - Newham green and water spaces infrastructure – total provision (by Ward) identifies Lady Trower Playing fields as ‘<i>Amenity Greenspace</i>’. No definition of Amenity Greenspace is provided within the Strategy. Section 3.2 <i>Publicly accessible greenspace provision</i> suggests that Amenity Greenspace is included within land identified as publicly accessible. <i>“Data provided by GiGL suggests that Newham has 254.72 Ha of publicly accessible greenspace consisting of: Amenity greenspace (61 sites): 24.06 Ha”</i> 4.20 Any error within the level of identified level of publicly accessible greenspace has an impact upon the level of green space per person which is currently identified as 0.71 Ha / 1,000 HoP.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), Newham's MOL/ Green Belt Review (2024) and the further refinement of green and water space mapping. Please see the updated mapping on the Regulation 19 Policies Map.

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	Comment noted.	4.21 The land at Lady Trower Playing Fields fulfils little amenity purposes. It has not been used for recreational purposes since the mid-20th century and is not accessible to the public.		Evidence base: Green and Water Spaces Strategy				Green and Water Spaces	Reg18-E-070/030	Aston Mansfield	Reg18-E-070

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	Comment noted.	4.22 Paragraph 9.2.3 and 9.2.4 illustrates Newham's Areas of Deficiency in access to nature. This includes <i>"parts of the eastern parts of the borough which are adjacent to areas of Borough value SINC's and Metropolitan Open Land that are currently private and inaccessible"</i> 4.23 Paragraph 9.3.1 states <i>"Reducing the extent of those parts of the borough that are in AoD is primarily reliant on increasing the provision of accessible Metropolitan or Borough SINC's in or within 1km of neighbourhoods within AoD"</i>. 4.24 Paragraph 9.3.4 details that: <i>"In these locations, policy needs to favour development and programmes that contribute to the greening of the public realm. This will not result in a formal reduction in the extent of AoD but these measures can provide more people with some experience of the natural world at the neighbourhood level, as well as some of the other benefits associated with urban greening such as air quality improvement and creating increased resilience to the impacts of climate change"</i>.		Evidence base: Green and Water Spaces Strategy				Green and Water Spaces	Reg18-E-070/031	Aston Mansfield	Reg18-E-070

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	Comment noted.	4.25 Section 6.0 details areas of deficiency to greenspace and parkland across LBN. The land to the north of Lady Tower Playing Fields and to the south of the railway line is identified as land with <i>No access to publicly accessible open spaces</i>		Evidence base: Green and Water Spaces Strategy				Green and Water Spaces	Reg18-E-070/032	Aston Mansfield	Reg18-E-070

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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set	08 GREEN AND WATER SPACES a. GWS1: Green Spaces - Would you keep, change or add something to this policy? Development upon Lady Trower Playing fields will enable the aims of policy GWS1 to be achieved because it will include an element of publicly accessible open space.						Green and Water Spaces	Reg18-E-070/083	Aston Mansfield	Reg18-E-070

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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	This policy approach has now changed due to evidence from the desktop review of Newham's MOL/Green Belt, which was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review recommends a minor amendment to the MOL boundary at East Ham Gasworks. Please see the new MOL boundary on the Policy Map. The change you have suggested has not resulted in a change as we did not consider this change appropriate as the desktop review of Newham's MOL/Green recommends the MOL remains in place with the exception of the minor boundary change.	It is noted that a review of Metropolitan Open Land (MOL) will be undertaken as part of the Regulation 19 process ¹ . Given that a review has yet to be undertaken, it is considered that the R18 plan has not been positively prepared because a full review has not yet been undertaken to support and inform it, especially given the Former East Ham Gasworks includes a removal from MOL.						Green and Water Spaces	Reg18-E-070/084	Aston Mansfield	Reg18-E-070

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	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set	It is expected that any such review will highlight that the MOL land currently comprises a series of inaccessible green space, providing no public benefit. The release of some MOL land for much needed housing and public open space would therefore outweigh any loss of MOL. Given that Lady Trower Playing Fields is currently not accessible to the public, nor does it provide any notable ecological benefit, it does not possess any of the London Plan features that warrants its allocation within the MOL and therefore should be removed from the MOL designation						Green and Water Spaces	Reg18-E-070/085	Aston Mansfield	Reg18-E-070

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Reg18-E-070	Aston Mansfield	Reg18-E-070/118	Green and Water Spaces						MOL Review	a. Would you like to provide any further feedback on the Draft Newham Local Plan? i.e., the Policies Map, the document's structure, design, readability As above, the Site at Lady Trower Trust Playing Fields should be, in part, removed from the MOL designation and be given a site allocation for housing.	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Reg18-E-070	Aston Mansfield	Reg18-E-070/120	Green and Water Spaces						MOL Review	MOL is given the same status and level of protection as the Green Belt, and therefore it is pertinent to refer to the NPPF Section 13, which provides the detail of this. According to Paragraph 142 of the NPPF, "When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account." This is reiterated in Paragraph 143 (a), which is about ensuring consistency with the development plan's strategy for meeting identified requirements for sustainable development. A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set	

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Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Reg18-E-070	Aston Mansfield	Reg18-E-070/122	Green and Water Spaces						MOL Review	Referring specifically to London Plan policy G3, the criteria for MOL designation is as follows: “1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value. 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria” Dealing with each of the above points in turn, the Site does not possess any of the features that warrants its allocation within the MOL and therefore should be removed from the MOL designation.	A change to this policy approach has not been made. We did not consider this change to be necessary as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for this site remains in place. Please see the Newham SINC Review (2022). London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set

Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Comment Response	out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach. The review does not recommend amendments to the existing designation at the Lady Trower Playing Fields therefore, the MOL remains in place.
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Reg18-E-133	Climate You Change	Reg18-E-133/183	Green and Water Spaces							General comment re paving in private gardens: We suggest a Council policy for a 'paving amnesty'. If residents are prepared to give up paving in their back gardens which permanently stops carbon drawdown, then could the Council pick this up and sell it to developers as urbanite etc. Residents could be encouraged to reduce the radiant heat reflected off paving slabs into their properties during extreme heat events.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the delivery paving amnesty scheme, is not provided in the Local Plan. It should also be noted that Policy CE8 sets out a presumption against impermeable hard-standing on domestic gardens and public open space.
Reg18-E-133	Climate You Change	Reg18-E-133/222	Green and Water Spaces							Free woody herbs – planters containing herbs would allow any resident to take a small amount of food and leave plenty for others. It could serve as a useful inspiration to grow food at home. (Ideally these would not be situated too close to the road because of contamination risk from particulate matter from vehicles)	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/224	Green and Water Spaces							Help for pollinators – alongside shrubs suitable for pollinators year-round there could be self-seeding wildflowers and those from rhizomes, such as bluebells which will come back every year.	This policy approach has now changed due to your suggestion to reference pollinating species with year round interest. Please see the new wording in the implementation text for Policy GWS1.4.
Reg18-E-133	Climate You Change	Reg18-E-133/225	Green and Water Spaces							Pesticide and herbicide free management of any greenery or weeds (across all greening).	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.

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	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	Newham has the least publicly accessible green space of any London borough and the Local Plan should tackle this problem head-on:						Green and Water Spaces	Reg18-E-040/002	CPRE	Reg18-E-040

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	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS2 for the exceptional circumstances which need to be met in order to develop on green space.										
	[Kerbside Strategy - use kerbside space for] rain gardens,							Green and Water Spaces	Reg18-E-040/050	CPRE	Reg18-E-040
	[Kerbside Strategy - use kerbside space for] tree planting on build-outs							Green and	Reg18-E-040/051	CPRE	Reg18-E-040

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	change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.							Water Spaces			
	A change to this policy approach has not been made. We did not consider this change to be necessary as play along the way and better use of the public realm is addressed in Policy D2: Public realm net gain.	[Kerbside Strategy - use kerbside space for] parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council's recent Kerbside Strategy);						Green and Water Spaces	Reg18-E-040/053	CPRE	Reg18-E-040
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 continues to provide guidance for communal amenity land on existing housing estates. Please see clause 3 of Policy GWS1 and its implementation text.	Housing estates, infill development and reconfiguring car-parking parking provision on estates The Local Plan should include a policy for housing estate green spaces						Green and Water Spaces	Reg18-E-040/078	CPRE	Reg18-E-040

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	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.								Reg18-E-040/079	CPRE	Reg18-E-040

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Reg18-E-040	CPRE	Reg18-E-040/080	Green and Water Spaces							[Housing estates, infill development and reconfiguring car-parking parking provision on estates] building on estate green spaces will be resisted	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy GWS1 already sets out our approach to communal amenity land on existing housing estates. We will only support development on communal amenity land in exceptional circumstances where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the resident.
Reg18-E-040	CPRE	Reg18-E-040/081	Green and Water Spaces							[Housing estates, infill development and reconfiguring car-parking parking provision on estates] ; if green space is lost it will be replaced and preferably enlarged;	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 already seeks to protect existing space to ensure there is no net loss, except where it meets the criteria set out in part 3 of the policy. Please see policy GWS1 and clause 3 which includes the requirement for replacement green space in Newham of equivalent or better functionality, quality and quantity.
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/004	Green and Water Spaces							Population Forecasts We note the population growth forecast of nearly 100,000 by 2038 included in the Plan and the consequences for the Borough's infrastructure and services provision. In particular we very much endorse the importance placed on public open space provision in the Plan.	Support noted.
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/005	Green and Water Spaces							We note Newham has the least publicly accessible green space per person of any London Borough (0.71 Hectares per 1,000 people) and that the Plan	Comment noted.

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		proposes to maintain this ratio with the projected population growth.									
	Comment noted. Over the Local Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. The Local Plan aims to maintain 0.71 hectares publicly accessible green space per 1,000 residents over the Plan period. A target of 3 hectares per 1,000 residents, a figure from Natural England, is a national ambition and, as such, it does not consider local circumstances. Whilst desirable, a 3 hectare per 1,000 target is not be a deliverable figure for Newham given it's population density and the percentage of	We also note the London Plan support for green space infrastructure and the recently launched English Nature Greenspace standards which recommend local authorities have at least 3 ha of publicly accessible green space per 1000 population.						Green and Water Spaces	Reg18-E-044/006	Friends of West Ham Park	Reg18-E-044

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	land in the borough which has already been built on.										
	This wording change has been made. The Neighbourhood's section of the Regulation 19 Local Plan now includes further details of where improvements and additions to open and water space can be made. For more detailed information, please see Newham's Green and Water Strategy (2024) which is published alongside the Regulation 19 consultation.	This clearly demonstrates the overall scale of depreciation in the Borough and reinforces the need for such an ambitious but very laudable aim. It will mean creating at least 70 hectares of new open space and parkland. This implies creating more than two new parks the size of West Ham Park within the Borough.						Green and Water Spaces	Reg18-E-044/007	Friends of West Ham Park	Reg18-E-044
	Comment noted.	We note West Ham Park already provides 12% of the Publicly Accessible Green Space in the Borough of Newham.						Green and Water Spaces	Reg18-E-044/007	Friends of West Ham Park	Reg18-E-044

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	Support noted.	Policy Proposals We generally support the proposed Green and Blue Space Policy proposals in the plan. However we offer some observations -						Green and Water Spaces	Reg18-E-044/008	Friends of West Ham Park	Reg18-E-044
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough’s green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and	How West Ham Park can help achieve the Local Plan’s targets West Ham Park has no statutory protection other than its Grade II Historic Park Status from Historic England.					Green and Water Spaces	Reg18-E-044/017	Friends of West Ham Park	Reg18-E-044	

Comment Response	environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	Comment noted. The Green and Water Infrastructure Strategy (2024) has been completed since the Regulation 18 Local Plan consultation. This updated evidence base has improved and updated our knowledge of the borough's green and water spaces. The Council is currently seeking to improve its in-house ecology expertise.	It seems that in-house expertise in ecology and biodiversity are currently lacking in the council's staff complement - this should be addressed as a matter of urgency rather than outsourcing these functions to third parties and relying on self-reporting by developers. This additional resource would be a belt-and-braces approach to ensure that the authority fulfils its			3.168			Green and Water Spaces	Reg18-K-019/001	Gasworks Dock Partnership - Cody Dock	Reg18-K-019

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		duty to have regard for biodiversity as outlined in guidance provided by Natural England (2014)									
		<u>Green Spaces</u> We support the Council's vision to maintain and enhance green spaces across the borough.						Green and Water Spaces	Reg18-E-096/021	L&Q	Reg18-E-096
	Comment noted. Arkwood and LWT, the consultants Newham is working with on the Green and Water Strategy (G&W Strategy) have drawn this work to a close. The G&W Strategy is an exercise to update and refresh our mapping and understanding of the amount and quality of green and water infrastructure, growing and play spaces in Newham. In general, the Strategy takes a high level view of the green and water spaces in Newham, their quantity, distribution, quality and the impact future population growth. The Strategy has enabled LBN to update our knowledge of the amount and the quality of green and water space in both Newham and the area currently covered by the LLDC. It has not delved into the individual functions of existing park spaces. In future, the Parks Team at Newham may wish to develop a Parks Strategy, but this sits beyond the scope of this work. The Strategy will include an Action Plan; this will	The detailed work undertaken as part of the interim Green and Water Spaces Strategy 2022 is welcome, although it would have been helpful if there had been some engagement with officers at the Authority so that the function of the Park's spaces and the opportunities they provide for the borough could be factored into the findings, particularly given large areas of the Park will soon revert to Newham in planning terms. The Regional Park is an important part of the borough's green and blue infrastructure linking through and providing access to green spaces and waterways beyond borough boundaries. Its spaces perform a range of functions both at a local and a strategic level. Officers would welcome an opportunity to engage with the proposed review of Metropolitan Open Land site designations as these relate						Green and Water Spaces	Reg18-E-097/029	Lee Valley Regional Park Authority	Reg18-E-097

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	set out how the principles of the Strategy should be delivered. London Plan Policy G3 stipulates that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of the Policy. A desktop review of Newham's MOL/Green Belt has been undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor, adjoining boroughs, the LLDC and the Lee Valley Regional Park Authority. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach.	to the Regional Park to help guide policy refinement for the Regulation 19 Local Plan.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 and GWS5 each require the appropriate maintenance of green space and the facilities in them.	Facilities in parks should be able to withstand the weather. In Senegal along the coast they have added 6 miles of exercise facilities which are being maintained						Green and Water Spaces	Reg18-D-001/027	Local Plan Drop-In	Reg18-D-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 and GWS5 each require the appropriate maintenance of green space and the facilities in them.	Green spaces - new facilities should be easily maintained as encourages exercise						Green and Water Spaces	Reg18-D-001/040	Local Plan Drop-In	Reg18-D-001

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Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/014	Green and Water Spaces							GWS1 - GWS5 We are pleased to see that Green and Blue infrastructure are identified as being key for promoting better health in Newham and an integral part of the recovery from the Covid-19 pandemic with green space provision being accessible to all identified as a matter of social justice. As mentioned in our response to the Issues and Options consultation, the London Borough of Newham is a neighbouring borough to Waltham Forest and a borough that falls partially within the Zone of Influence of/borders the Epping Forest SAC and SSSI and the Lee Valley Regional Park.	Support noted.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/016	Green and Water Spaces							Waltham Forest is fully committed to ongoing collaboration with Newham and other partner boroughs on the key cross-boundary strategic issue of Epping Forest and the Lee Valley Regional Park under the duty to cooperate agreement in place.	Support noted for cross borough partnership working.

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	Comment noted.	Our Response As part of our response to this consultation, we have conducted an analysis of the current protections in place for the sites included on our Inventory, with respect to national and local listing, conservation areas, Metropolitan Open Land, the Green Belt, Archaeological Priority Areas etc. We have compiled this analysis in the attached appendix, which shows the distribution of protections across the sites. It would be helpful to map this out as part of the SPD and cross reference to the relevant policies. Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. We ask local authorities to include these spaces in their Local Plans and related policies to encourage protection of these precious historic landscapes which add character and improve well being for everyone. LPG hopes its Inventory is used as a resource to inform supplementary planning documentation in the future. [See Appendix 1 Planning Status LPG Inventory Newham]						Green and Water Spaces	Reg18-E-084/002	London Historic Parks and Gardens Trust	Reg18-E-084

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	The extent of the Metropolitan Open Land at the QEOP was a mapping error which has now been corrected. Regarding the proposed SINC designation at the QEOP, an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the proposed SINC designation for this site remains in place. Please see the Newham SINC Review (2022).	It is apparent from a review of the draft Newham Local Plan and the draft accompanying Policies Map that this either changes or removes proposals, sites and designations that are currently in place and captured in the LLDC Local Plan. There are also significant reductions in the area of Metropolitan Open Land from that designated in the LLDC Local Plan, while much of the Queen Elizabeth Olympic Park is proposed as a new Site of Importance for Nature Conservation. These are individually set out in the appended table of comments, however, it is worth noting that changing or removing existing land use designations and site allocations will have specific consequences for what will and will not be acceptable from a land-use and development point of view with an impact for those with an interest in those sites and locations and how they develop or manage these. Where these have a specific impact on the interests of the LLDC it would be helpful to be able to discuss these further in order to explore whether these changes require amendment or can be supported.						Green and Water Spaces	Reg18-E-052/019	London Legacy Development Corporation	Reg18-E-052

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/200	Green and Water Spaces							Policies Map. The draft Policies Map shows the parklands of the Queen Elizabeth Olympic Park as open space. In the LLDC Local Plan these areas are designated as Metropolitan Open Land. And 'Local Open Space to be Protected'. It is unclear whether the intention is to de-designated the Metropolitan Open Land across this area or whether this is simply a drafting omission. Given the importance of MoL designation as part of a strategy to ensure protection of this parkland and its openness, it is considered that the MoL designation should continue here and that the Policies Map should be updated to show this area as MoL as per the LLDC Local Plan.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), Newham's Green Belt Review (2024) and the further refinement of green and water space mapping. Please see the updated mapping on the Regulation 19 Policies Map.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/201	Green and Water Spaces							Policies Map. Please also refer to comments made above in respect to the proposed new Site of Importance for Nature Conservation within the Queen Elizabeth Olympic Park, where this may need to be amended or deleted [see comment Reg18-E-052/119]	Comment noted. An assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to: • Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary. • Identify and justify potential new SINC's to reduce areas of

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and the further refinement of green and water space mapping. Please see the updated mapping on the Regulation 19 Policies Map.	Policies Map. It is noted that the venues in the Queen Elizabeth Olympic Park and Lea Valley Velo Park are denoted as Open Space when these are significant buildings set within open space and MoL. The map should be corrected to exclude the footprint of these buildings, including the London Stadium, Aquatic Centre and the Velodrome.						Green and Water Spaces	Reg18-E-052/202	London Legacy Development Corporation	Reg18-E-052

Reg18-E-103	Marine Management Organisation	Reg18-E-103/003	Green and Water Spaces							Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist. [Hyperlinks in text include: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL	This policy approach has now changed to make specific reference to the South East Marine Plan by name. The Policy previously referenced the 'relevant Marine Plan'. Please see the new wording in Policy GWS3.

										_South_East_Marine_Plan__1_.pdf https://www.gov.uk/government/publications/uk-marine-policy-statement https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils https://www.gov.uk/guidance/explore-marine-plans https://www.local.gov.uk/pas/plan-making/local-plan-review-update/consultation-engagement/local-plan-reg-22-consultation	

Reg18-E-103	Marine Management Organisation	Reg18-E-103/005	Green and Water Spaces							Summary notes Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your local plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed: • SE-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. • SE-INF-2: (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported. (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities. (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport. (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on existing landing facilities	Comment noted.

										• SE-CO-1: Proposals that optimise the use of space and incorporate opportunities for co-existence and co-operation with existing activities will be supported. Where potential conflicts with existing activities are likely (including displacement) proposals must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on existing activities (including displacement) d) if it is not possible to mitigate significant adverse impacts on existing activities (including displacement), proposals should state the case for proceeding. • SE-PS-1: Only proposals demonstrating compatibility with current activity and future opportunity for sustainable expansion of port and harbour activities will be supported. Proposals that may have a significant adverse impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. • SE-PS-2: Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance must not be authorised within or encroaching upon	

										International Maritime Organization routing systems unless there are exceptional circumstances. • SE-PS-3: Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance which encroaches upon high density navigation routes, strategically important navigation routes, or that pose a risk to the viability of passenger services, must not be authorised unless there are exceptional circumstances. • SE-PS-4: Proposals promoting or facilitating sustainable coastal and/or short sea shipping as an alternative to road, rail or air transport will be supported where appropriate. • SE-HER-1: Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate harm to those elements contributing to the significance of heritage assets d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets. • SE-SCP-1: Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:	

										a) avoid b) minimise c) mitigate d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area. • SE-EMP-1: Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following: i) create employment in areas identified as the most deprived, or ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or iii) create a diversity of opportunities, or iv) implement new technologies. • SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid	

										b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation. • SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change. • SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate the significant adverse impacts upon these climate change adaptation measures. • SE-AIR-1: Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.	

										• SE-ML-1: Public authorities must make adequate provision for the prevention, reuse, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction. • SE-ML-2: Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area, must include measures to: a) avoid b) minimise c) mitigate waste entering the marine environment. • SE-WQ-1: Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate deterioration of water quality in the marine environment. • SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference: a) avoid b) minimise	

										c) mitigate significant adverse impacts on public access. • SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate that impact. • SE-SOC-1: Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal. • SE-MPA-1: Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate adverse impacts, with due regard given to statutory advice on an ecologically coherent network. • SE-MPA-2: Proposals that enhance a marine protected area's ability to adapt to climate change, enhancing the resilience of the marine protected area network will be supported. Proposals that may have adverse impacts on an individual marine protected area's	

										ability to adapt to the effects of climate change and so reduce the resilience of the marine protected area network, must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate adverse impacts. • SE-MPA-3: Where statutory advice states that a marine protected area site condition is deteriorating or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered. • SE-MPA-4: Proposals must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on designated geodiversity. • SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts. • SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or	

										habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) compensate for significant adverse impacts. • SE-BIO-3: Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference: a) avoid b) minimise c) mitigate d) compensate for net habitat loss and deliver environmental net gain. • SE-NG-1: Proposals should deliver environmental net gain for marine or coastal natural capital assets and services. Proposals that may have significant adverse impacts on marine and coastal natural capital assets and services must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts and deliver environmental net gain.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/002	Green and Water Spaces						Check Issues and Options to ensure no points are missed	Natural England have previously issued advice relation to the Local Plan Issues and Options, and this response builds upon that existing advice. This advice is based on the Draft Local Plan, The Newham Green and Water Spaces Strategy (Interim Report) and the Habitats Regulation Assessment Information Report. We draw your attention to section 3 of our response which contains our comments around Epping Forest SAC.	Comment noted.
Reg18-E-144	Natural England	Reg18-E-144/006	Green and Water Spaces							We welcome the inclusion of Green and Water Spaces in the local plan, and the consideration of these issues in the policies that follow. Please find our comments below, which are structured in themes rather than by specific policy. We understand that the Green Infrastructure Strategy is still being developed and look forward to discussing this further in the coming months. We have addressed Epping Forest SAC separately in section 3.	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<u>2.1 Green and Blue Infrastructure</u> A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. To assist local authorities with their Green Infrastructure Strategies, Natural England has produced the 'Green Infrastructure Framework Principles and Standards for England' as part of the Government's 25 Year Environment Plan to deliver more and better quality green infrastructure (GI) to enhance towns and cities, and create attractive, healthy, and investable places. The GI Framework will help local planning authorities meet requirements in the National Planning Policy Framework to consider GI in local plans and in new developments and can be utilised when updating local plans and formulating policy. The first two elements of the Framework are the 'Why, What and How Principles of good Green Infrastructure' and the Beta Green Infrastructure Mapping Tool providing a baseline of GI across England. These are already available at https://designatedsites.naturalengland						Green and Water Spaces	Reg18-E-144/007	Natural England	Reg18-E-144

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		https://www.gov.uk/government/consultations/green-infrastructure-framework The full Framework includes recommended standards for the quality and quantity of multifunctional green space including the production of GI Strategies, updated access to natural green space standards (ANGSt), tree canopy cover, and good design principles.									
	This wording change has been made. Please see the new wording in the monitoring text for Policy GWS3.	[2.1 Green and Blue Infrastructure] The Plan should also outline how new green infrastructure and habitat creation will be monitored to ensure that it develops in accordance with any						Green and Water Spaces	Reg18-E-144/008	Natural England	Reg18-E-144

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Reg18-E-144	Natural England	Reg18-E-144/009	Green and Water Spaces							2.2 Health and wellbeing There is increasing recognition of the importance of nature and place as a determinant of individuals' mental and physical health. Existing evidence¹ shows that access to natural green spaces can help reduce stress, fatigue, anxiety, and depression, and boost immune systems and encourage physical activity. The risk of chronic diseases such as asthma may also be reduced. The Defra 25 Year Plan outlines nature-based actions that can be taken to help people connect to the natural environment to improve health and wellbeing. Such actions can include 'greening' our towns and cities, planting urban trees, encouraging children to access nature in and out of school and improving access for all in local green spaces. It is estimated that the provision of parks and greenspaces across Britain saves the NHS at least £110 million a year solely through reduced visits to GPs², and their improved availability can help reduce health inequalities across society³. The provision of enhanced green infrastructure and sites of nature conservation value can not only help address some of the mental and physical health problems experienced in the Borough's population but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation. Natural England recommend the Local plan sets out policy that links public	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and the need to make more explicit the health and wellbeing benefits of green and water space. The Local Plan addresses the topic of health and wellbeing through a 'health in all policies' approach. This means the Local Plan systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity. The policies in the Green and Water Spaces chapter are an important component of this approach. Please see the new wording in the introduction to the chapter sets out how green and water infrastructure provide a significant range of benefits (often described as 'ecosystem services'), one of which is enhancing the health and wellbeing of people living in the borough, in addition to supporting Newham's economy by making the borough an attractive place to live and work and helping to address the twin challenges of the climate change and biodiversity emergencies. It goes on to set out how well-connected, designed and managed green and water spaces provide social and cultural benefits, with spaces for physical activity, play and community events all helping to improve mental and physical health. The justification text to Policy GWS1 sets out that spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. It further sets out how a well-designed green space can encourage more physical activity and benefit social connection and mental

										health and wellbeing to the natural environment and seeks to enhance green infrastructure and ecological connectivity across the Borough that is managed for people and nature. Please see relevant advice in this letter relating to green infrastructure, protection of natural assets and achieving biodiversity net gain to help maximise the benefits outlined in this section. 1 Evidence Statement on the links between natural environments and human health, University of Exeter and Defra, 2017; Urban Green Spaces and Health, World Health Organisation Regional Office for Europe, 2016, 9-10; Urban Green Spaces and Health, World Health Organisation Regional Office for Europe, 2016, 9-10. 2 Revaluing Parks and Green Spaces Measuring their economic and wellbeing value to individuals, Fields In Trust, 2018 3 Marmot, M. Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010. (2010) ISBN 9780956487001	health. Lastly it sets out that playing fields and pitches play a vital role in building healthy neighbourhoods, contributing to physical, mental and emotional wellbeing. Please also see the amendments to policies GWS2, GWS3, GWS4 and GWS5 each of which seeks to deliver, and set out the benefits to the health of people as well as enhancements to the natural environment.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. We welcome Natural England's support with our work on Newham's SANG Strategy and the air quality considerations in respect of Epping Forest SAC. This has been further considered through the Habitats Regulation Assessment on the Regulation 19 Local Plan.	<u>2.3 Biodiversity</u> <i>Designated sites and Habitats Regulations Assessment</i> The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary. We welcome the HRA Information Report that was provided alongside the Regulation 18 consultation and agree with the designated sites that have been considered as part of this process. We have provided more detailed comments on Epping Forest SAC below and would advise that impacts of the plan on this designated site should be considered fully through the Appropriate Assessment stage of the	HRA report comment					Green and Water Spaces	Reg18-E-144/010	Natural England	Reg18-E-144

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		HRA. We are happy to work with the council to further the recreational pressure and air quality considerations which are outlined in the report.									
	Comment noted.	We note that the HRA report also highlights the need to consider Air Quality impacts on Epping Forest SAC, and that this will be considered through the appropriate assessment process. We draw your attention to Natural England's 2018 Air Quality Guidance.	HRA report comment					Green and Water Spaces	Reg18-E-144/012	Natural England	Reg18-E-144

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. We welcome the support for continuing our joint work on the Epping Forest SAC. We are undertaking work on a SANGs Strategy to support the delivery of the Local Plan using your proposed methodology and approach.	<u>3. Epping Forest Special Area of Conservation (SAC)</u> We are aware that Epping Forest SAC is already an issue that Newham Council is working on at a strategic scale, and we look forward to continuing to work with the borough on this issue. We welcome the inclusion of Epping Forest in the Green and Blue Spaces interim report. Epping Forest is one of the last examples of large-scale wood pasture in lowland Britain and has retained features such as ancient and semi-ancient natural woodland, old grassland and scattered wetland. Epping Forest SAC is already subject to high levels of recreational pressures from impacts including walking, mountain biking and activities such as unmanaged fires, as well as the increase in traffic on several roads which cut through the SAC. The site is therefore particularly sensitive to further increases to recreational pressure and traffic-related air pollution, which are both predicted to escalate due to planned development in the Authorities within the Zone of Influence of the SAC. The Local Plan should give great weight to the protection of Epping Forest SAC. Natural England are working with the boroughs of Redbridge, Waltham Forest and Enfield to put together						Green and Water Spaces	Reg18-E-144/027	Natural England	Reg18-E-144

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Comment	borough wide approaches to SANG style measures (the toolbox approach). We would encourage Newham to adopt a similar approach. We have also visited LLDC, and fed into a list of possible projects within LLDC that could fit the criteria of the toolbox approach to form mitigation. We are continuing to engage with LLDC on their approach to Epping Forest SAC mitigation. As a large part of LLDC will return to Newham at the end of 2024, we feel that it is important that Newham and LLDC have similar approaches to Epping Forest mitigation.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-144	Natural England	Reg18-E-144/028	Green and Water Spaces							With regards to the Suitable Alternative Natural Greenspace (SANG) section of the Interim Green and Blue Spaces Report, we would be supportive of the consideration of an approach similar to those being adopted in other London boroughs, to reflect the urban context in which the mitigation is being developed. We look forward to discussing this further with Newham Council in the next month.	Comment noted. We welcome the support for continuing our joint work on the Epping Forest SAC. We are undertaking work on a SANGs Strategy to support the delivery of the Local Plan using your proposed methodology and approach.
Reg18-E-144	Natural England	Reg18-E-144/030	Green and Water Spaces							The Local Plan can be used as a vehicle to identify potential developer mitigation options around the borough. Having this sort of strategic approach to the avoidance and mitigation measures for Epping Forest SAC would help in the evidence base for the HRA.	Comment noted. We welcome the support for continuing our joint work on the Epping Forest SAC. We are undertaking work on a SANGs Strategy to support the delivery of the Local Plan using your proposed methodology and approach.

Reg18-E-144	Natural England	Reg18-E-144/032	Green and Water Spaces							<u>4. Other Advice</u> <i>Wider environmental gains</i> Natural England focusses advice on embedding biodiversity net gain in development plans since the approach is better developed than for wider environmental gains. However, your authority should consider the requirements of the NPPF (paragraphs 73, 104, 120 and 174) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space of biodiversity strategies. Opportunities for environmental gains, including nature-based solutions to help adapt to climate change, might include. • Identifying opportunities for new multi-functional green and blue infrastructure. • Managing existing and new public spaces to be more wildlife friendly and climate resilient (e.g. by sowing wildflower strips, changing cutting regime of open spaces and road verges). O’Sullivan et. al (2017) provide a useful example of cost-effective, low-maintenance management for species-rich grassland on road verges and the value they can contribute to biodiversity and ecosystem services⁴. • Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape. [...]	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and the need to make more explicit environmental net gain. Please see the policies in the Green and Water chapter which address the points raised.

										• Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore) [...] Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we are using the London Plan (2021) definition of green space which is: All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape. The Local Plan also clarifies that these spaces are considered green space whether or not they are accessible to the public but it does exclude private residential gardens. It should also be noted that we use the London Plan definition of open space which is: all land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted. Whilst the policy approach has not changed, the Green and Water chapter in the Local Plan and the glossary have been updated to more clearly reflect the use and application of the London Plan definitions.	"The definition of 'open space' in the NPPF is: Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. In respect of NewVic (and many other sites), it is noted that any land which does not have a building on it or is not car parking has been designated as open space. This is contrary to the definition contained within the NPPF, and will seriously hinder NewVic's ability to respond to its education needs....			4. Where a development is providing publicly			Green and Water Spaces	Reg18-K-040/001	Newham 6th Form College	Reg18-K-040

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	2. More generally, we are disturbed that there is no commitment to increasing public space to increase access to open spaces in parts of the Borough which are ill-served by green or water spaces. We note this, in view of the plan's commitment to build high rise towers, and its own acknowledgement that Newham has one of the lowest ratios of green space/resident in London. We reiterate the positive impact on health and wellbeing that green and water spaces can have on residents.						Green and Water Spaces	Reg18-E-089/003	Newham New Deal Partnership	Reg18-E-089

Comment Response	
	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space.	3. We observe that the lack of play and green space will have a particularly detrimental effect on families with children, and believe that children have a right to access and enjoy quality, accessible open space near their homes in order to develop and grow into healthy and well adjusted adults.						Green and Water Spaces	Reg18-E-089/004	Newham New Deal Partnership	Reg18-E-089

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not	2. The plan is silent on how the identified shortfall of 105 hectares of new space for children to meet the national quality requirements is to be met;						Green and Water Spaces	Reg18-E-089/009	Newham New Deal Partnership	Reg18-E-089

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	I support the river Roding Trust's proposal to restore the Back River in East Ham						Green and Water Spaces	Reg18-E-047/001	Other	Reg18-E-047

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	I lived in East Ham between 1993 and 1999 and spent time enjoying the local parks and other public amenities.						Green and Water Spaces	Reg18-E-047/002	Other	Reg18-E-047
	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of	I still have friends in the area and it would be an amazing project [restoration of the Back River] for future generations.						Green and Water Spaces	Reg18-E-047/003	Other	Reg18-E-047

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy GWS1 and GWS5 already set out an expectation to provide drinking water facilities in green and play spaces.	[Add] Water fountains in parks						Green and Water Spaces	Reg18-Ap-001/114	Plaistow Assembly	Reg18-Ap-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.							Green and Water Spaces	Reg18-Ap-001/115	Plaistow Assembly	Reg18-Ap-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-T-117/001	Plashet Park	Reg18-T-117
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. There are no plans to build on Plashet Park. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Please provide any comments and feedback on the *Introduction*.] You have NOT consulted residents associations. Please send us the information about Plashet Park as we have been alerted by another residents association that there are plans for its development which we have not seen nor been consulted on.									
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000	You may be aware that the City of London Corporation, the trustees of WHP, are proposing to sell off the former nursery area of the park for private housing development. FWHP, and many others including local MPs and councillors, are strongly opposed to this proposal, and wish the land to be retained as part of the park.	N9						Reg18-E-015/002	Resident	Reg18-E-015

Comment Response	residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS1 for the exceptional circumstances which need to be met in order to develop on green space.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.	Evidence base - mapping error Regrettably the maps published by Newham Council in the Local Plan documentation show the nursery area of the park as not being part of the park! In this they differ from Ordnance Survey, Land Registry, Historic England, and many others (see some attachments below). The false impression provided by the Newham map could be of use to the Corporation of the City of London in claiming that the land in question is in fact not part of the park and therefore should be made available for sale for building development. I hope you will be able to correct in good time these and any other maps used/published by Newham so that they cannot give support to further diminution of the already inadequate provision of green space in our borough. [4 maps provided]						Green and Water Spaces	Reg18-E-015/003	Resident	Reg18-E-015

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-022/002	Resident	Reg18-E-022
	The farm has been closed far too long when it could have been a great place still to visit for those groups mentioned above. Comment noted. In September 2021 the Cabinet made a decision to close Newham City Farm (meeting held on 7 September 2022). The Council has been 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 has been an integral part of co-designing the future of this area. On Tuesday 30 January 2024 Newham Council Cabinet approved the Beckton Parks Masterplan. The Masterplan proposes that the former Newham City Farm site is redesigned to create a new community farm with green skills hub. The site will be reconfigured and an operator will be sought to take on management of the new offer. More information can be found here: https://newhamco-create.co.uk/en/projects/becktonparksmasterplan							Green and Water Spaces			
	Green space interim strategy evidence base I am encouraged by the Consultation report feedback's response that Newham Council acknowledges the problem of not employing an ecologist, and stating that it partially remedies this by working with London Wildlife Trust and Jon Scheaff Associates. However, looking at Jon Scheaff Associates, I am worried that they are landscape architects and not ecologists. How do you properly manage land for biodiversity if you are Support noted for the Interim Green and Water Infrastructure Strategy (2023). The completed Green and Water Infrastructure Strategy (2024) is available for comment alongside the Regulation 19 Local Plan consultation. The Council is currently seeking to improve our in-house ecology expertise.	Evidence base						Green and Water Spaces	Reg18-E-027/026	Resident	Reg18-E-027

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		not an ecologist? I mean, Capability Brown was a landscaper, but definitely not interested or knowledgeable in biodiversity. However, I am encouraged by the Interim green space strategy, as the sections on biodiversity to seem to be written by someone who really knows their stuff. The acknowledgement of the value of brownfield sites and scrub is really, really encouraging.									
	The Local Plan addresses this topic through policy H10 which seeks to deliver appropriate accommodation for Gypsies and Travellers. However, it cannot deliver the change you have requested. Our colleagues in the parks department may be able to help regarding managing grazing. We have also provided them with your comments.	Another problem I've encountered is Travellers horses tied up everywhere, clearly unauthorised. I've seen them on bits of grass outside housing estates in Waltham Forest. I've seen them on nature reserves and wildlife sites in Barking and Dagenham and Newham. In Barking and Dagenham, horses are authorised from the local riding school, not travellers horses, on parts of the Chase nature reserve. But there was a real problem of unauthorised horses left by travellers on the Beamlands nature reserve. They used to damage all the wildflower meadows there. (It's now burned down in the fires last year during the drought – please see my comments on Greenspaces). Similarly, I've seen travellers horses eating and damaging the meadow at Beckton Park (though not even sure if this still exists						Green and Water Spaces	Reg18-E-027/031	Resident	Reg18-E-027

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		– again please see my comments on Green spaces.) This is what happens when you just say it's fine, they don't need specific traveller accommodation or traveller sites because they don't meet the definition.									
		The River Roding Trust wants to open up the East Ham back rivers which used to run on the Metropolitan open land at the back of the gas works . It's an amazing vision & I totally support this . The River Roding Trust want to work with Newham & local people to achieve this . The land could be used for an amazing new park with playing areas , a community garden , park land , riverside walks , sculptures. In Wall End we do not have access to open space & this is so desperately needed. This is a once in a life time opportunity & I really want Newham to commit to this . [...] Please make sure you read what the							Reg18-E-086/010	Resident	Reg18-E-086
		This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River						Green and Water Spaces			

Comment Response	
Comment	River Roding Trust is proposing . They have an amazing vision for this site . It's a once in a lifetime opportunity. Please Newham council , do not mess this up. initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.
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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.	This is line with the aspirations of the council to significantly improve the local environment and address the climate emergency by supporting bio-diversity and access to nature for local residents.						Green and Water Spaces	Reg18-E-041/002	Resident	Reg18-E-041

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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.								Reg18-E-042/001	Resident	Reg18-E-042

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	This policy approach has changed to reflect the support both in the Council and with residents for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their vision to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has been amended to include in the development principle for the site, the requirement for developers to explore the restoration of the Back River. N13.SA3 is the only site allocation in the Local Plan which includes a portion of the historic Back River route. Newham's Green and Water Infrastructure Strategy (2024) also supports the Back River initiative. The Strategy includes an Action Plan which includes key actions we need to undertake to deliver better water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as the delivery of the 'Back River' project extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.								Reg18-E-058/001	Resident	Reg18-E-058

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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/005	Green and Water Spaces				characterisation study			Comment 2: Newham Characterisation Study: There is a lack of information within this study that describes and illustrates the variety of natural features that occur in the borough.	Comment noted. The Characterisation Study (2022) is evidence base that was completed ahead of the Green and Water Infrastructure Strategy (2024). As such, the Characterisation Study could not reflect the finer details of Newham's green spaces, which are now provided in the Green and Water Infrastructure Strategy (2024). The findings of the Interim Green and Water Spaces Strategy (2022) fed into the Characterisation Study and informed the Reg 18 Local Plan.
Reg18-E-091	Resident	Reg18-E-091/006	Green and Water Spaces							[Natural features] Whilst potentially forgotten by the general public, hard to find and in poor condition, they are still very important	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through

Comment Response	consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The Characterisation Study (2022) was informed by the Interim Green and Water Spaces Strategy (2022). Following its completion, the Green and Water Infrastructure Strategy (2024) has been updated and finalised. While this has not been reflected in the Characterisation Study, this update has been used to inform the requirements in the Local Plan, including the green and water space policies, neighbourhood policies and site allocations. While the Characterisation Study is an important evidence base it is used alongside all other evidence base documents to inform the Local Plan and subsequent applications. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	. As the characterisation study forms the basis of other policies and reports, the absence of ecological character information is a concern. How will developers design sensitively to protect, enhance and create new wildlife habitats if the characterisation study and design information doesn't explain how to do it?		charac terisat ion study				Green and Water Spaces	Reg18-E-091/008	Resident	Reg18-E-091
	Comment noted. The Characterisation Study (2022) was informed by the Interim Green and Water Spaces Strategy (2022). Following its completion, the Green and Water Infrastructure Strategy (2024) has been updated and finalised. While this has not been reflected in the Characterisation Study, this update has been used to inform the requirements in the Local Plan, including the green and water space policies, neighbourhood policies and site allocations. While the Characterisation Study is an important evidence base it is used alongside all other evidence base documents to inform the Local Plan and subsequent applications.	The urban design team at Old Oak Common and Park Royal (OPDC) growth area understood this by commissioning a landscape ecology characterisation study in 2019, which described and pictured key design clues relating to distinct "Landscape Ecology Areas". For more information speak to dan.epstein@opdc.london.gov.uk. The second East Ham workshop proposed by Jon Sheaff to explore potential projects further may also be an opportunity to understand the character or green and blue spaces						Green and Water Spaces	Reg18-E-091/009	Resident	Reg18-E-091

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	more fully. Something that is not typically included in the scope of a SINC review.									
	Comment noted. The Characterisation Study (2022) was informed by the Interim Green and Water Spaces Strategy (2022). Following its completion, the Green and Water Infrastructure Strategy (2024) has been updated and finalised. While this has not been reflected in the Characterisation Study, this update has been used to inform the requirements in the Local Plan, including the green and water space policies, neighbourhood policies and site allocations. While the Characterisation Study is an important evidence base it is used alongside all other evidence base documents to inform the Local Plan and subsequent applications. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	Comment 3: Newham Characterisation study Chapter 9 and 11: An absence of any ecological evidence in the references section of this document is a concern and suggests no ecological knowledge underpins this study. In a word search, even the word "river" is only mentioned a few times.						Green and Water Spaces	Reg18-E-091/010	Resident	Reg18-E-091

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The Characterisation Study (2022) was informed by the Interim Green and Water Spaces Strategy (2022). Following its completion, the Green and Water Infrastructure Strategy (2024) has been updated and finalised. While this has not been reflected in the Characterisation Study, this update has been used to inform the requirements in the Local Plan, including the green and water space policies, neighbourhood policies and site allocations. While the Characterisation Study is an important evidence base it is used alongside all other evidence base documents to inform the Local Plan and subsequent applications. Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.	Given that the borough is defined by three large tidal rivers: Thames, Lea and Roding and the internationally important Epping Forest southern most tip is located in the borough, natural features and the ecological environment should have a much stronger influence over design		characterisation study				Green and Water Spaces	Reg18-E-091/011	Resident	Reg18-E-091
	Comment noted. The Characterisation Study (2022) was informed by the Interim Green and Water Spaces Strategy (2022). Following its completion, the Green and Water Infrastructure Strategy (2024) has been updated and finalised. While this has not been reflected in the Characterisation Study, this update has been used to inform the requirements in the Local Plan, including the green and water space policies, neighbourhood policies and site allocations. While the Characterisation Study is an important evidence base it is used alongside all other evidence base documents to inform the Local Plan and subsequent applications.	This ensures that where there are opportunities, new development can help unlock the historical, cultural and ecological character and function of existing features that makes Newham special, valuable to its residents and the basis for improving the borough's resilience to climate change and help nature recover		characterisation study				Green and Water Spaces	Reg18-E-091/012	Resident	Reg18-E-091

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Please see the Green and Water Infrastructure Strategy (2024) which is evidence to support our policy approach to the borough's green, water, access to nature, play and growing space needs.										
	Comment noted. The Characterisation Study (2022) is evidence base that was completed ahead of the full Green and Water Infrastructure Strategy (2024). As such, the Characterisation Study did not reflect the finer details of Newham's green spaces which is now provided in the Green and Water Infrastructure Strategy (2024). The findings of the 2024 Strategy are now reflected in the Regulation 19 Local Plan, in its neighbourhood chapter and relevant site allocations.	A useful starting point would be London Natural Signatures http://publications.naturalengland.org.uk/publication/6540238365130752 (commissioned by Natural England and undertaken by urban designers Alan Baxter Associates). It is a "framework to re-establish the relationship between the built and the natural aspects of London. A tool that can help planners and developers reflect the natural landscapes more clearly when regenerating and renewing the capital".		characterisation study				Green and Water Spaces	Reg18-E-091/013	Resident	Reg18-E-091

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	Comment noted.	Other documents that would be good to see referenced in the characterisation study and future design guidance include: 1. Urban greening for Biodiversity Net Gain - a design guide (GLA homepage or PDF) https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide#making-london-greener-and-wilder 2. Nature Conservation in Newham, Ecology Handbook 17, London Ecology Unit (1998) 3. Lea valley regional park Landscape Character Assessment https://www.enfield.gov.uk/__data/assets/pdf_file/0019/5950/cd-43-lvrp-landscape-character-assessment-part-3-improving-enfield.pdf 4. All London Green Grid: River Roding and Epping Forest Area Framework https://www.london.gov.uk/sites/default/files/af02_river_roding_and_epping_forest.pdf?token=ldut6vGB 5. All London Green Grid: Lea Valley and Finchley Ridge Area Framework https://www.london.gov.uk/sites/default/files/af01_lee_valley_and_finchley_ridge.pdf?token=B5t7X6vX 6. Cody Dock Tidal Lea Ecology Report 2021 – 22. Gasworks Dock Partnership. June 2022 7. Wanstead Wildlife website.		charac terisa tion study					Green and Water Spaces	Reg18-E-091/014	Resident	Reg18-E-091

Comment Response	
Comment	https://www.wansteadwildlife.org.uk/index.php/en/ 8. Newham's Biodiversity Action Plan (LUC, 2010). https://www.queenelizabetholympicpark.co.uk/~media/lldc/local%20plan/local%20plan%20examination%20documents/other%20strategy%20papers/s22%20newham%20biodiversity%20action%20plan%202010.pdf
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Comment 6: Policy to discourage loss of private garden land: There doesn't seem to be a policy in the new local plan that protects private garden land from inappropriate loss or development						Green and Water Spaces	Reg18-E-091/024	Resident	Reg18-E-091
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we are continuing the approach in our adopted Local Plan where due to the scale of housing need limited garden development may be permitted where it would meet other policy requirements in the Plan, in particular, the design and neighbourliness policies.							Green and Water Spaces	Reg18-E-091/025	Resident	Reg18-E-091
	Whilst garden land is relatively low (compared to other boroughs in London) https://www.gigl.org.uk/2022/07/21/suttons-garden-resource/ They can provide important health and wellbeing benefits to the homeowner, provide urban cooling and wildlife habitat and substantial help to improve the appearance and character of residential streets										
	Comment noted.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has reviewed the number and quality of the borough's play spaces. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise any opportunity to provide new publicly accessible play space. Local Plan Policy GWS5: Play and informal recreation for all ages seeks to protect and maximise opportunities for play space. The Neighbourhood's section of the Regulation 19 Local Plan now also includes further details of where new play space should be delivered. For more detailed information please see Newham's Green and Water	"Many playgrounds in Newham are of poor quality, old and small. Investment is needed. Make sure there's a bench to allow parents to sit down, and a water fountain is nice too. Why does the Olympic Park have a giant wonderful playground - everywhere should have things like that"							Reg18-K-003/014	Resident	Reg18-K-003

Comment Response	Strategy (2024) which is published alongside the Regulation 19 consultation.										
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.								Reg18-K-021/001	Resident	Reg18-K-021

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a	...In this context I note that the policy map wrongly shows the nursery site of West Ham Park as part of the built environment. The nursery site was part of the park as originally established and is within the boundaries of the Park as recorded at the HM Land Registry and within the areas subject to the Grade 2 listing of Historic England. To exclude this area from the park as the maps						Green and Water Spaces	Reg18-K-032/002	Resident	Reg18-K-032

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.	appear to do would represent a net loss of existing open space. In addition to representing a net loss, City of London proposal to develop all or part of the site for housing would have an adverse impact on the quality of the park by partially enclosing and reducing the openness of the space. It is not possible to justify the proposal by claiming that the nursery is a “brownfield” site which is defined in the National Planning Policy Framework as: “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		The Planning Inspector has previously ruled that greenhouses are not permanent structures for this purpose."									
	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching				3.161			Green and Water Spaces	Reg18-K-033/001	Resident	Reg18-K-033

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.										
	from another resident: Why are we cutting down all of the trees in the Borough, especially in Eastham ? What is being done to clean and preserve our ponds and lakes, rather than big cooperations dumping in waste in them?				3.164			Green and Water Spaces	Reg18-K-033/002	Resident	Reg18-K-033

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	the borough. The Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.										
	Comment noted. Newham currently has a low level of play and informal recreation space. The borough has 84 publicly accessible playgrounds, with a total area of nine hectares. 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 90 hectares. As Newham's population increases to 456,462 over the Plan period, play space provision will fall to 0.019 hectares per 1,000 residents. To achieve the standard in 2038 will require the creation of 114 hectares of new play space. Newham's existing play spaces, as well as being low in number, are not in a good condition, with 70 per cent being 'very poor', 'poor' or 'fair'. In common with parks, most poor quality playground sites are to be found in the most deprived areas across the Borough. It is therefore vital we maximise	there is a lack of outdoor facilities for young people. Places they can stay that are safe, outdoor, covered. Things like outside gym equipments and free toilets should be in all parks.			3.166			Green and Water Spaces	Reg18-K-033/003	Resident	Reg18-K-033

Comment Response	any opportunity to provide new publicly accessible play space.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Please provide any comments and feedback on the *Introduction*.] West Ham Park and other green spaces are key to our community and need to stay.						Introduction	Reg18-T-015/001	Resident	Reg18-T-015

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Please see Newham's Green and Water Infrastructure Strategy (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live. Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space. The Local Plan therefore seeks to protect all existing green space (including spaces not								Reg18-T-015/002	Resident	Reg18-T-015

Comment Response	designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. However, it should be noted that this does not preclude any future development on green space from happening. Please see Policy GWS2 for the exceptional circumstances which need to be met in order to develop on green space.
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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	Comment noted. The policies in the Green and Water chapter of the Local Plan continue to protect and seek to improve Newham's green spaces. Please see the Green and Water Infrastructure Strategy (2024), a key evidence document which supports our policy approach to the borough's green, water, access to nature, play and growing space needs.	[Please provide any comments and feedback on the *Introduction*.] Therefore, we need the local plan to properly protect our local parks.						Introduction	Reg18-T-025/003	Resident	Reg18-T-025

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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	The Local Plan addresses this topic through Policy GWS1. However, it cannot deliver the change you have requested. Our colleagues in the Park team may be able to help. We have provided them with your comments.	Give business rate discounts to businesses with flower beds and trees. [Originally response to T1]						Green and Water Spaces	Reg18-T-026/023	Resident	Reg18-T-026

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.							Introduction	Reg18-T-051/001	Resident	Reg18-T-051

Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.										
	A change to this policy approach has been made. Please see the implementation text to Policy GWS1 which now states that development next to green space must not negatively impact: • views into and out of green open space • provision of natural light • the experience of people already using the space or the biodiversity value of the space due to intensification of use, with	[Please provide any comments and feedback on the *Introduction*.] Further, the housing around the park is all low-level and a new large building would be entirely out of keeping with existing building styles.						Introduction	Reg18-T-052/002	Resident	Reg18-T-052

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	consideration to existing maintenance budgets										
	Comment noted. Planning Policy GWS1 and GWS3 both continue to support the provision of green space at roof level.	[Please provide any comments and feedback on the *Introduction*.] buildings in Newham can have greenery at the top of the building such as trees, and plants and follow the Singapore motto,						Introduction	Reg18-T-058/002	Resident	Reg18-T-058
	Comment noted. We have provided the Parks team with your comments regarding Folkstone Road Allotments.	[Please provide any comments and feedback on the *Introduction*.] I am particularly interested in the waterway at Folkstone Road Allotments which has had no maintenance for years. We once had ducks and swans 10 years ago.						Introduction	Reg18-T-071/002	Resident	Reg18-T-071

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	Comment noted. Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. It has determined those areas of the borough that are currently under-provided with access to green and water space, play space, community growing space, natural and semi-natural greenspace and Sites of Importance for Nature Conservation. As such, the Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy extend beyond the scope of planning and will be taken forward by other departments in the council, partners and community groups. The Strategy is published alongside the Local Plan Regulation 19 consultation.							Green and Water Spaces	Reg18-T-079/001	Resident	Reg18-T-079

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	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.								Reg18-T-089/001	Resident	Reg18-T-089

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Comment Response	The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-118	Resident	Reg18-T-118/001	Green and Water Spaces							[Add to it] Please tackle the litter in our parks. It is unsightly and dangerous.	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council Further information about fines for people who litter can be found here: Street Litter – Newham Council We have also provided the Waste team with your comments.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/129	Green and Water Spaces							The Berkeley Group supports the principle of the Local Plan Refresh's approach to green and water spaces in the borough, recognising the importance of these spaces in enhancing the quality of lives and making Newham a more attractive and safer place as well as providing a home to wildlife.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East	Reg18-E-136/130	Green and Water Spaces							It is acknowledged that Newham has a total of 923 hectares of open space (including water spaces) which equates to a rate of provision for all open space	Comment noted.

Comment Response	
Comment	of 2.57 hectares per 1,000 residents, which is a precious but scarce resource.
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Representor	London Limited
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