

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-C-008 | Roger Jones | | Reg19-C-008/001a | Green and Water Spaces | GWS1 Green spaces | | | | | | Yes | Yes | | | | | | Yes | We believe the Local Plan is Sound and complies with the Duty to Co-operate. We are delighted to see that in the Regulation 19 Local Plan it is proposed that the whole of the current West Ham Park site is designated as Green Space, is not a possible Site Allocation, and changes the plan boundaries to include all of the park site within one Plan Neighbourhood area. This is very much appreciated, and a huge relief to the local community who so value this wonderful asset within the Borough so much. | None | <p>Support noted. The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, thereby removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham's Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-C-008 | Roger Jones | | Reg19-C-008/001b | Green and Water Spaces | GWS1 Green spaces | | | | | | Yes | Yes | | | | | | Yes | We also very much support the proposed approach to the wider protection and development of green and blue spaces along with creating Green Corridor Connections within the Borough. | | Support noted. |
| Reg19-C-023 | Bob Sharples | | Reg19-C-023/007 | Green and Water Spaces | GWS1 Green spaces | | | | | | Yes | Yes | | | | | | Yes | Sport England fully supports this policy as it has got a sound evidence base for the sports facilities: Newham Playing Pitch Strategy, (2024) which is referenced on pages 10 and 263 of this document. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|---------------------|------------------------|-------------------|--------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg-19-D-EH-001 | Sharon Fell | | Reg-19-D-EH-001/005 | Green and Water Spaces | GWS1 Green spaces | N13.SA2 East Ham Primark | | | | | Blank | No | | | | | | Blank | Green public realm – where will this fit in an already congested space? Who will be responsible for maintenance? Whilst I commend pocket parks/green realm – many in Newham attract rubbish and groups of men. | | A change to this policy approach has not been made. We did not consider this change to be necessary as clause 5 of Policy GWS1 sets out that it is expected that 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. The Council is satisfied that the plan is sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-014 | CPRE | | Reg19-E-014/006 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | <p>[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:]</p> <p>2. Policy GWS1(1) and (2) should be revised to accommodate GAIN of green space (not simply no net loss) and to deliver adequate green space <u>per person</u>. 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 <u>per person</u>.”</p> | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--|
| Reg19-E-014 | CPRE | | Reg19-E-014/010 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | <p>The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed: 3. Significant new green spaces should be created and existing parks designated as follows.]</p> <ul style="list-style-type: none">• West Ham Park should be designated as a Local Green Space in its entirety as it is currently under threat from development and is one of the few open spaces in this highly built-up part of the borough. The LGS status should include the site of the derelict greenhouses which should be retained as part of the park. More generally, the Plan should designate all key public parks and open spaces as Local Green Space to ensure they are protected into the future. | | <p>The Council’s objective for this policy approach is to ensure the Local Plan positively prepared, protecting, enhancing and delivering a network of accessible green space, to meet the needs of the population both now and over the plan period (to 2038). The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in London Plan Policy G3. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This is justified by up to date evidence, in an update to Newham’s Metropolitan Open Land Review (2025).</p> <p>The Council recognises the importance of ensuring the plan is positively prepared and for the approach to Metropolitan Open Land to be in conformity with the London Plan and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to the Policies Map:</p> <p>• Correct green space allocation at West Ham Nursey Site, to form part of the wider West Ham Parks MOL parcel (A33) and not a community growing space.</p> <p>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.</p> <p>Regarding designating all key parks as Local Green Space, 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 green space through Policy GWS1. The policy 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 meet the additional demand from new development. The Council is satisfied that the plan remains sound without the proposed changes.</p> |

| | | | | | | | | | | | | | | | | | | | |
|-------------|------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|--|--|--|--|--|--|---|---|
| Reg19-E-014 | CPRE | | Reg19-E-014/020 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | <p>9. Designating space for woodland creation</p> <p>Attached to this submission is a separate image file outlining our proposed M25 of trees route. [see image named 'Proposed tree ring route' in folder] The line in yellow shows route for creating connectivity in tree cover around the capital, across borough boundaries. We very much hope that as part of its land-use planning, Newham Council could support and encourage a range of treescape along this line ranging from planting and allowing natural regeneration of native woodland, to orchard areas, to areas of intensified street tree planting and the creation of garden streets in response to the urgent need for action on climate change and biodiversity strengthening. We are happy to talk to the Council about the map and how it has been created. It is important to stress the route is provisional and we are in the process of further landowner and community engagement to provide a further layer of verification of the suitability of these sites. A higher resolution zoomable version of the map, and underlying information, is available direct from Greenspace Information for Greater London (GiGL). Members of the Tree Ring Steering group include The Conservation Volunteers, Woodland Trust, Trees for City and Forestry England. The plan also has the unanimous support of the More Natural Capital Coalition - a coalition of 19 environmental charities working across the capital.</p> <p>local people have come forward to us to recommend the following sites in Newham which could be considered for tree planting and woodland creation to contribute to a London Tree Ring Community Forest:</p> <p>East Ham Nature Reserve</p> <ul style="list-style-type: none">• Ownership: Managed by Newham Council, Parks Department <p>Leigh Road Sports Grounds</p> <ul style="list-style-type: none">• Area – approx. 9 ha• Ownership: London Borough of Newham, a charity (possibly) <p>Miers Close Wildlife Area</p> <ul style="list-style-type: none">• Area: 0.19 hectares• Ownership: London Borough of Newham <p>Barking Road Recreation Ground</p> <ul style="list-style-type: none">• Area – approx. 0.174 ha• Ownership: LBN (London Borough of Newham) <p>Jenkins Lane Civic Amenity Site</p> <ul style="list-style-type: none">• Area – approximately 0.03 ha• Ownership: London Borough of Newham <p>Beckton Sewage Treatment Works</p> <ul style="list-style-type: none">• Ownership: Thames Water <p>Bromley-by-Bow Gas Works</p> <ul style="list-style-type: none">• Area – approx. 1 ha• Ownership: Birch sites limited (private) <p>Three Mills Park</p> <ul style="list-style-type: none">•Area: approx. 0.3 ha•Ownership: Lee Valley regional park authority <p>Land north west of West Ham Station</p> <ul style="list-style-type: none">•Ownership: Unknown. <p>Little Ilford Park</p> <ul style="list-style-type: none">•Ownership: London Borough of Newham | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of tree planting and woodland creation through Policies GWS1, GWS3 and GWS4. However, the Local Plan cannot deliver the change you have requested. The Council’s Parks Team is best placed to engage with the CPRE on the emerging plans outlined for the proposed ‘Tree Ring Route’. Your comment has been passed onto Newham’s Parks team. The Council is satisfied that the plan remains sound without the proposed change.</p> |
|-------------|------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|--|--|--|--|--|--|---|---|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-033 | Thames Water | | Reg19-E-033/012 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | No | | | | | | Blank | <p>[In relation to the current Local Plan, we supported the deletion of the MOL designation on the site and security centre at Beckton STW.] However, as previously promoted, we consider it is important that MOL is removed from the whole of the Northern Lagoon area at Beckton STW.</p> <p>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).</p> <p>The S106 Agreement states in Schedule 2, Section 4.2.6 that: “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.” And at Section 4.4 that: “ 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.....” .</p> <p>By its very status, this area is therefore land which TW retains expressly for the purpose of carrying out its statutory undertakings and so should not be restricted by way of land use planning designations that do not reflect that agreed status. Furthermore, as part of its statutory role under the Water Industry Act 1991 and in response to the challenges identified in its adopted WRMP24 TW is investigating the means by which this area of operational land might contribute to the management and recycling of treated wastewater.</p> | | A change to this policy approach has not been made. We did not consider this change to be necessary as the 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. The Council is satisfied that the plan remains sound without the proposed change. |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|--------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|-------|----|--|--|--|--|--|-------|--|--|--|
| Reg19-E-033 | Thames Water | | Reg19-E-033/013 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | No | | | | | | Blank | <p>Water Resources Management Plan 2024</p> <p>Our draft Water Resources Management Plan 2024 (WRMP24) builds on our current plan (WRMP19) and reflects the draft South East regional plan. It sets out how we'll keep taps flowing for customers like you over the next 50 years, looking ahead to 2075.</p> <p>Our draft plan highlights the significant future shortfall in water resources in our supply area and the actions we plan to take to maintain the balance between water supply and demand. It sets out how we're going to tackle leaks, make every drop count and invest in new water infrastructure. We must make bold decisions and act now to ensure we have the water we need in generations to come.</p> <p>We published our draft Water Resources Management Plan (WRMP24) for consultation between 13 December 2022 and 21 March 2023.</p> <p>In August 2023, we published a report, called the Statement of Response, which set out our consideration of the feedback we received and changes made to our draft plan in response. These changes have been included within our revised draft WRMP24. This has also been published. We are awaiting a response from Ofwat on the draft WRMP. Further information can be found at: https://www.thameswater.co.uk/about-us/regulation/water-resources</p> <p>Thames Water have been working with Water Resources South East (WRSE) to develop integrated plans to address the region's future water resources challenges and help protect London from the risk of drought. This work has identified the need for new projects to improve drought resilience in response to population and climate change. In the shorter term, Thames Water are currently proposing a new river abstraction on the River Thames at Teddington which will be supported by water recycling, and provision of a new reservoir near Abingdon (South East Strategic Reservoir Option) which would store water from the River Thames during the winter then release water back into the river (when levels fall or demand increases) for re-abstraction downstream. Both projects will ensure a reliable water supply during drought periods for residents, businesses, schools, hospitals and other essential services across London.</p> <p>Our WRMP24 also includes a proposal for a wastewater re-use plant on the northern lagoon site at Beckton STW for longer term water supply.</p> | | Comment noted. |
| Reg19-E-033 | Thames Water | | Reg19-E-033/014 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | No | | | | | | Blank | <p>Case for Removal of Operational Site from MOL</p> <p>It is considered that there are exceptional circumstances to remove the northern lagoon site from MOL in association with the current Local Plan review.</p> <p>As previously indicated, the remainder of Beckton Sewage Treatment Works (STW)</p> | <p>It is therefore considered that exceptional circumstances do exist to remove the northern lagoon area at Beckton STW from MOL in accordance with Policy G3, as was the case in relation to the main Beckton STW site and Crossness STW.</p> | <p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment.</p> |

| | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| | | | | | | | | | | | | | | | | | | | <p>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 have recently been removed from MOL in the recently adopted Bexley Local Plan Review.</p> <p>Policy G3 of the London Plan sets out that “...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.”</p> <p>It is therefore important that this opportunity to de designate the northern lagoon site through the current Local Plan review is not missed as a future Local Plan review may be too late.</p> <p>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 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 has been submitted to Ofwat who made a draft determination in July 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.</p> <p>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:</p> <p>1) The site is not distinguishable from the built-up area. The site forms part of operational Beckton STW site.</p> <p>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).</p> <p>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.</p> <p>3) The site is previously developed with sewerage infrastructure and does not contain any features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.</p> <p>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.</p> <p>The removal of the MOL designation would facilitate any new operational</p> | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|

| | LB Newham Response | Proposed modifications and explanation | Representor Comment | Complies with Duty to Cooperate? | Consistent with the London Plan? | Consistent with the NPPF? | Effective? | Justified? | Positively prepared? | Sound? | Legally Compliant? | Implementation text | Justification | Clause | Introduction | Site allocation | Policy | Chapter | Comment Reference | Agent | Representor | Representation Reference |
|--|--------------------|--|---|----------------------------------|----------------------------------|---------------------------|------------|------------|----------------------|--------|--------------------|---------------------|---------------|--------|--------------|-----------------|--------|---------|-------------------|-------|-------------|--------------------------|
| | | | <p>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.</p> <p>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.</p> | | | | | | | | | | | | | | | | | | | |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | |
|-------------|-------------------------|------------------------|-----------------|------------------------|-------------------|--|--|--|--|--|-------|----|--|--|--|--|-------|--|--|--|
| Reg19-E-033 | Thames Water | | Reg19-E-033/016 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | No | | | | | Blank | <p>Part of Thames Water’s Abbey Mills Pumping Station (PS) site (Mill Meads Allotments) is designated as Green Space. Thames Water object to this designation as the land is retained operational land [see extract from policies map below with red arrow pointing to open space].</p> <p>The Abbey Mills PS site is either currently in operational use or retained for future operational use (including the site referred to as Mill Meads Allotments) and is of strategic importance to London’s existing and future infrastructure requirements. Thames Water temporarily lease the site to be used as allotments, but the land has been retained for future operational use. It is important that the site is not constrained by unnecessary restrictions which could prevent future upgrades to this essential sewerage infrastructure.</p> <p>The Lee Tunnel has recently been constructed from Beckton Sewage Works to the open area to the south of the Abbey Mills PS buildings. The Lee Tunnel is now operational and captures around 16million tonnes of storm water sewage each year from the largest sewer overflow point in north London and transfers the flows to Beckton Sewage Works for treatment.</p> <p>The Thames Tideway Tunnel (TTT) also connects at Abbey Mills and will transfer its flows to Beckton Sewage Works for treatment. The TTT is a major new sewer that will help tackle the problem of overflows from the capital’s Victorian sewers and will protect the River Thames from increasing pollution for at least the next 100 years. The TTT Development Consent Order was approved in September 2014 and the TTT is being constructed.</p> <p>Both the Lee Tunnel and TTT DCO consents have secured various landscaping and public access via the Long Wall Path around the site. The Abbey Mills site also has land retained for future operational use. This may be required for future wastewater or water infrastructure to cater for growth, mitigate the impacts of climate change or catering for tighter environmental regulations.</p> <p>Given the strategic importance of the site, the scale of infrastructure development at Abbey Mills PS and the potential for future infrastructure investment at the site it is important that the site is not is not constrained by unnecessary planning policy restrictions, such as Local Open Space designation and Policy BN.7, which could prevent future upgrades to essential infrastructure.</p> | <p>Delete the Green Space designation from the Abbey Mills PS site.</p> <p>If for any reason this is not accepted, the Policy should be amended so as to recognize the need for future operational development at the Abbey Mills PS site.</p> | <p>A change to this policy approach has not been made. A change to this policy approach has not been made. We did not consider this change to be necessary as the green space is a designated Local Open Space in the adopted LLDC Local Plan (2020). All green spaces were appraised in Newham’s Green and Water Infrastructure Strategy. The Mill Mead allotments remain to be a green space and functioning allotment.</p> <p>The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 15 allotments and community growing spaces with a total area of 17.1 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.05 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.</p> <p>The 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. The Council is satisfied that the plan remains sound without the proposed change.</p> |
| Reg19-E-035 | Newham 6th Form College | Quadrant Town Planning | Reg19-E-035/026 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | <p>5.1 Policy GWS1 Green Space notates all incidental space at NewVlc as such – see extract below. This is onerous and restricts the College’s ability to address its current and future educational requirements [Figure 3: Extract from draft Proposal Map showing proposed designations at NewVlc]</p> | | <p>This mapping error is noted. This has been rectified by making the following mapping change:</p> <p>Correct green space at Newham 6th Form College on Polices Map - remove green space designation</p> <p>Correct green space at Newham 6th Form College on Key Diagram - remove green space designation</p> <p>However, please note that as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------------------|------------------------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| | | | | | | | | | | | | | | | | | | | | | these spaces which are not designated on the Policies Map. |
| Reg19-E-035 | Newham 6th Form College | Quadrant Town Planning | Reg19-E-035/027 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | No | | | 5.2 The definition of 'Green Space' in paragraph 106 of the NPPF is as follows: [Image of Paragraph 106 of NPPF] 5.3 In respect of NewVlc (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 Green Space. This is contrary to the definition contained within the NPPF, and will seriously hinder NewVlc's ability to respond to its education needs. | | This mapping error is noted. This has been rectified by making the following mapping change: Correct green space at Newham 6th Form College on Polices Map - remove green space designation Correct green space at Newham 6th Form College on Key Diagram - remove green space designation However, please note that as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map. |
| Reg19-E-035 | Newham 6th Form College | Quadrant Town Planning | Reg19-E-035/028 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | 5.4 The Green Space at NewVlc - which should more appropriately be described as incidental areas of land - is not 'demonstrably special to a local community', as it is not prominent in visual terms on Prince Regent Lane, nor is there any public access to the campus, for safeguarding reasons. The designated areas do not provide any public visual amenity as they are largely obscured from public viewpoints and could at best be described as gaps between buildings. | | This mapping error is noted. This has been rectified by making the following mapping change: Correct green space at Newham 6th Form College on Polices Map - remove green space designation Correct green space at Newham 6th Form College on Key Diagram - remove green space designation However, please note that as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map. |
| Reg19-E-035 | Newham 6th Form College | Quadrant Town Planning | Reg19-E-035/029 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | 5.5 For the most part, the areas designated on the proposal map as 'Green Space' at NewVlc comprise concrete footpaths, access roads, hardstanding between buildings, courtyards, external fire escape routes and do not fall within the definition of Green Space. 5.6 They areas are not of significance due to 'beauty, historic significance, recreational value, tranquillity or richness of wildlife'. | | This mapping error is noted. This has been rectified by making the following mapping change: Correct green space at Newham 6th Form College on Polices Map - remove green space designation Correct green space at Newham 6th Form College on Key Diagram - remove green space designation However, please note that as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map. |
| Reg19-E-035 | Newham 6th Form College | Quadrant Town Planning | Reg19-E-035/030 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | 5.7 Furthermore, Policy GSW1 uses an 'exceptional circumstance' test for any development on Green Space which should only be used in respect of green belt/MOL. Such a test would undermine the provision of new education floorspace at NewVlc. | | A change to this policy approach has not been made. We did not consider this change to be necessary as 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. Clause 1.b of Policy GWS1 sets out the approach to Metropolitan Open Land and Green Belt, which should meet London Plan (2021) and national Green Belt policy - which use the term 'very special circumstances' in relation to Green Belt. The Council is satisfied that the plan remains sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|------------------|---------|-------------------|------------------------|-------------------|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/051 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | Development upon Lady Trower Trust Playing fields will enable the aims of policy GWS1 to be achieved through the inclusion of an element of publicly accessible open space. | | Comment noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/052 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1 | | | | | | | | | | | Support the broad principle of delivering easy access to a network of high-quality green space. | | Support noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/053 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1a | | | | | | | | | | | Object: Policy places blanket protection upon defined open space with no consideration of its useability or ecological value. The Metropolitan Open Land Site Assessment, on which this policy is based, has contradictory and misleading assertions, and needs to be revisited, particularly in relation to the Site’s recreational value and ‘openness’ | | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. Please note Newham’s MOL Review (2025) includes an update to amend an error not related to your comment. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/054 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1b | | | | | | | | | | | Object: Policy should reflect the Newham Metropolitan Open Land Review 2024 which recommends some changes to MOL boundaries. | Suggested change to wording: maintaining the open character of retained Metropolitan Open Land in accordance with the London Plan (2021) and national Green Belt policy | A change to this policy approach has not been made. We did not consider this change to be necessary as the Metropolitan Open Land designations in the Local Plan are justified by up to date evidence. Newham’s MOL Review and any proposed deletions or amendments to MOL are reflected in this evidence base and the Policies Map. Please note Newham’s MOL Review (2025) includes an update to amend an error not related to your comment. The Council is satisfied that the plan is/remains sound without the proposed changes. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/055 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1c | | | | | | | | | | | Support: Opportunity to improve functionality, connectivity, quality, and accessibility of open space. | | Support noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/056 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1d | | | | | | | | | | | Support: Recognition that development should respond positively to open space. | | Support noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/057 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1e | | | | | | | | | | | Support: The opportunity to deliver improved open space. | | Support noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/058 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1f | | | | | | | | | | | Support: The recognition to consider green infrastructure and improvements to green links from the outset. | | Support noted. |
| Reg19-E-083 | Aston Mansfiel d | Savills | Reg19-E-083/059 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.2 | | | | | | | | | | | Support: Ensures the protection of the highest quality playing fields, and most effective use of land. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|------------------------------------|---------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/060 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.2 | | | | | | | | | | | Object: Exclusion of MOL ignores varying qualities of this land within the borough as set out within the Newham Metropolitan Open Land Review 2024 | | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/05 | Green and Water Spaces | GWS1 Green spaces | | | GWS1b | | | Yes | Yes | | | | | | | Metropolitan Open Land The Authority notes and supports the removal of the Lee Valley Velodrome from the wider Olympic Park MOL designation. It is understood this approach is consistent with the treatment of the London Stadium, which currently does not form part of the adopted MOL parcel, (reference to the Newham MOL and Green Belt Review (2024) Appendix A MOL Site Assessments MOL Area 32) | | Support noted. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/06 | Green and Water Spaces | GWS1 Green spaces | | | GWS1b | | | Yes | Yes | | | | | | | The remainder of the Lee Valley VeloPark will retain its MOL designation, however the Authority supports the additional designation 'Sports Facilities in Green Space' shown on the Policies Map for the outdoor cycling tracks associated with the venue. Policy GWS1 will apply and this seeks to ensure development provides or helps to deliver easy access to a network of high-quality green spaces which for the areas of MOL such as the wider Lee Valley VeloPark area would require the open character of the area to be maintained. | | Comment noted. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/07 | Green and Water Spaces | GWS1 Green spaces | | | GWS1b | | | Yes | Yes | | | | | | | The Implementation text associated with GWS1b is helpful. "Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings." | | Support noted. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/11a | Green and Water Spaces | GWS1 Green spaces | | | | | | Yes | Yes | | | | | | | The Authority maintains its support for Policies on Green Space GWS1, | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---|---------------------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/11b | Green and Water Spaces | GWS1 Green spaces | | | | | | Yes | Yes | | | | | | | The Authority maintains its support for Policies on [Green Space GWS1, and] Water Space GWS2 and welcomes the strengthening of policy GWS2 so as to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility as set out below. This should help to protect the quality and enjoyment of the water spaces within the Regional Park in Newham and their associated character, heritage and biodiversity. | | Support noted. |
| Reg19-E-180 | PEACH: The People's Empowerment Alliance for Custom House | | Reg19-E-180/016 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | Blank | | | | | | Blank | Greenspaces In relation to policy GWS1, we believe housing infill onto green spaces in Newham should not be allowed. | | A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements are justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. Newham's Green and Water Infrastructure Strategy is the evidence used to inform 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 0.72 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. |
| Reg19-E-181 | LAMIT c/ CCLA Investment Management Ltd | Rolfe Judd Planning | Reg19-E-181/006 | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | Blank | | | | | | Blank | [Key Emerging Policies The following draft policies are relevant to the Alpine Way site:] GWS1 (Green Spaces) includes the Alpine Walk, Windsor Terrace Landscape Buffer and Beckton Alps to the south and west of the Alpine Way site. The policy focuses on protecting, enhancing, and improving access to high-quality green spaces across Newham. It ensures no net loss of green spaces, maintaining their character while improving functionality, connectivity and accessibility. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------------|----------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--|
| Reg19-E-185 | Hadley Property Group | Deloitte | Reg19-E-185/026 | Green and Water Spaces | GWS1 Green spaces | | | | | | No | No | | | | | | No | Green and Water Spaces Policy GWS1: Green spaces Hadley continues to support LBN's ambition to deliver a network of high-quality green spaces and will provide 10,000sqm of new public realm as part of the IQLN development. However, Hadley is disappointed that LBN has not amended the policy requiring new open space functioning as a local park to be transferred to the Council's ownership. Although it is noted that the policy provides for a management plan to be secured where it is agreed that the transfer of ownership is not to happen, Hadley continues to be concerned by the onus put on transferring ownership to the Council. The ability to transfer land ownership should be an option rather than automatic and should be agreed on a site-by-site basis. It is beneficial for developers to carry out estate management of larger schemes to support placemaking and ensuring open spaces are kept secure and safe for residents. The policy should make clearer that transfer of land ownership is an option. The current wording does not provide clarity on when it would be agreed that transfer of land ownership would not be required and prioritises the transfer of land ownership. Hadley requests that the wording is amended to make clear that this is an option rather than automatic. | | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/059 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | Policy GWS1 Green spaces 9.2 As noted in the Regulation 18 representations, St William is committed to supporting LBN in delivering easy access to a network of high-quality green spaces. Their sites at Bromley by Bow, TwelveTrees Park, Beckton Riverside, East Ham and Rick Roberts Way represent a significant opportunity to deliver and provide access to new high quality green space with these sites having been inaccessible to the public for many years. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/060 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.3 | | | | No | | | | | | | 9.3 In relation to GWS1 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. 9.4 In the same vein, Part 3 of this policy sets out where exceptional circumstances can be demonstrated for development on green space, however as currently draft it excludes MOL and Green Belt. In line with our previous comments, MOL and Green Belt should not be excluded and 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. | [Appendix 12: General Policies – Suggested amendments] 3. Developments on green space (excluding Metropolitan Open Land and Green Belt) will only be supported in exceptional circumstances. | A change to this policy approach has not been made. We did not consider this change to be necessary as 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. Clause 1.b of Policy GWS1 sets out the approach to Metropolitan Open Land and Green Belt, which should meet London Plan (2021) and national Green Belt policy - which use the term 'very special circumstances' in relation to Green Belt. The Council is satisfied that the plan remains sound without the proposed changes. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/061 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.4 | | | | No | | | | | | | 9.5 Part 4 (d) of the draft policy requires biodiversity to be maximised, delivering a minimum of 10% biodiversity net gain in a way that is particular to the local need and environmental character. St William considers that the biodiversity net gain requirements should be fully in line with relevant legislation which doesn't specify local need. It is therefore not considered necessary to refer to meeting local need and environmental character. | [Appendix 12: General Policies – Suggested amendments] 4. Where a development is providing publicly accessible green space, it should: d) maximise biodiversity, delivering a minimum 10 percent Biodiversity Net Gain in a way that is particular to the local need and environmental character (see Local Plan Policy GSW3); | A change to this policy approach has not been made. We did not consider this change to be necessary as clause 4 aligns with national legislation and government guidance. Natural England and the Environment Agency are supportive of this element of the policy. Indeed, the Planning Advisory Service (PAS), in its Biodiversity Net Gain (BNG) guidance for Local Planning Authorities, sets out that a locally-specific BNG policy can help to ensure that BNG contributes to wider nature recovery plans in addition to local objectives. It can help ensure that the right habitats are provided in the right places. As set out on Defra's website: 'Through biodiversity net gain, LPAs can secure local areas in which nature can thrive. In turn, this provides green space for their communities, with all the mental and physical benefits that brings. Plus, these new habitats can also help to improve things like flood resilience and air quality'. The Council is satisfied that the plan remains sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|---|
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/062 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.5 | | | | No | | | | | | | 9.6 St William maintain their previous comments in relation to Part 5 of this policy and the requirement for new open space to either be transferred into the Council’s ownership and a commuted sum to be paid, to cover the cost of maintenance over a period of 15-years (secured through a legal agreement) or the provision of a Management Plan for new open space that isn’t adopted. This policy should make clear that there are two options available for the management and maintenance of new open space rather than the presumption being that new open space will automatically transfer to Council ownership. 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. | [Appendix 12: General Policies – Suggested amendments] 5. It is expected that new green space on site allocations or space which will function as a local park will either: a. 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. or b. 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. | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. |
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/057a | Green and Water Spaces | GWS1 Green spaces | | | | | | Blank | Blank | | | | | | Blank | The policy is generally supported and in alignment with the proposals for Silvertown. | | Support noted. |
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/057b | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | The reference in Part 5 to the transfer of open spaces to the Council is not supported as it is not considered that this will be necessary with the right controls in place. At Silvertown, open spaces will benefit strongly from being managed as part of the wider Estate. This aspect of the policy should be deleted. | | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. |
| Reg19-E-206 | GLP (Land at Central Thameside West and Former Alnex site) | DP9 | Reg19-E-206/20 | Green and Water Spaces | GWS1 Green spaces | | | 1.f | | | | | | | | | | | The requirements of draft policies relating to public realm in the context of industrial developments As raised at Regulation 18 stage, draft Policy GWS1 (Green spaces) includes a proposed requirement (at Part 3 in the Regulation 18 draft, now at Part 1f)for development referable to the Mayor of London to provide on-site publicly accessible open space. Whilst this ambition is broadly welcomed and GLP will be delivering 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 Policy GWS1 Part 1f to add “where appropriate, proportionate and compatible with the development” Suggested track changes to policy: GWS1f: requiring development referable to the Mayor of London, or where a specific green space need has been identified by the Council, including in the site allocations, to provide on-site publicly accessible green space where appropriate, proportionate and compatible with the development | A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement. In addition, Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach. The quantity and type of green space stipulated in the Local Plan’s site allocations has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. The specific detail regarding how that green space is designed and delivered, across the site allocations and development sites in the borough, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|------------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-222 | Ballymore | Rolfe Judd | Reg19-E-222/39 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | Green and Water Spaces Policy GWS1: Green spaces Ballymore supports the Council's ambition to deliver easy access to a network of high-quality green spaces for all residents. 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). | Support noted. A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. |

| | | | | | | | | | | | | | | | | | | | | |
|-------------|-----------------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|-------|-------|--|--|--|-------|--|---|--|
| Reg19-E-226 | NHS North East London | | Reg19-E-226/013 | Green and Water Spaces | GWS1 Green spaces | | | | | | | Blank | Blank | | | | Blank | <p>Newham Hospital Green Space designation in relation to Policy GWS1: Green Spaces – Policies Map</p> <p>As can be seen from the screen shot of the Newham Local Plan Policies Map, most of the site of Newham Hospital is designated within Policy GWS1. NHS NEL recognises the importance of green space conservation and reprovision, and supports Policy GWS1, but the designations within the hospital grounds and on small, landscaped areas south of Glen Road, as shown in the image below (See page 4), are restrictive in the context of potential hospital development and growth. As currently drawn this designation could impact upon the delivery of the Local Plan, particularly in respect of Policy S12: New and re-provided community facilities and health facilities and N10 Plaistow.</p> <p>Policy GWS1 sets out that that green space within this designation ‘will be protected to ensure that there is no net loss’. Whilst there are exceptions listed within part 3, NHS NEL are of the view that the site is not captured within any of these exceptions. Given the financially constrained environment within which NHS NEL and other partners are currently operating within, it is critical that the redevelopment of a site is not further burdened by the costs associated with justifying the loss of green space. LBN can be reassured that the NHS has a swathe of green initiatives as well as the Greener NHS programme and so corporately will be endeavouring to achieve as environmentally sustainable a development as possible. NHS NEL want to ensure that the potential development or redevelopment of the Newham Hospital site can occur with the least amount of resistance and best value for money for the public purse.</p> <p>A masterplan exercise has been commissioned by One Public Estate (run by the Local Government Association) for a large area of land including Newham Hospital and Newham Leisure Centre. The concept behind One Public Estate is to ensure that synergies between publicly owned land and assets within close proximity to each other are maximised. It is anticipated that this work will be undertaken during Q4 2024 and Q1 2025. Ultimately, there is the potential for this work to form a Supplementary Planning Document to support delivery.</p> | <p>To ensure the masterplan work is effective and deliverable over the plan period, the sporadic green space designations within the hospital, along Glen Road, and in the space off Cherry Treeway should be removed to allow a deliverable masterplan to come forward and sit alongside the Local Plan.</p> | <p>Comment noted. This comment has been subject to further discussion with NHS North East London. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as this policy approach is justified by up to date evidence base, through the Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space.</p> <p>As set out in paragrah 3.200 of the Local Plan, green infrastructure provides 'a significant range of benefits (often described as ‘ecosystem services’), enhancing the health and wellbeing of people living in the borough, 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. Newham’s Just Transition Plan (2023) and the borough’s health and wellbeing strategy, Well Newham, 50 Steps to a Healthier Borough (2024) recognise the important role open spaces play in helping address the climate emergency and improving our health and wellbeing.</p> <p>We consider that the Local Plan is sufficiently flexible to enable development at Newham Hospital, while also delivering access to green and water space.</p> <p>Policy GWS1 Green Space, seeks to deliver easy access to a network of high-quality green spaces. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement. In addition, Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach. The specific detail regarding how that green space is designed and delivered, across a development site, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage.</p> <p>Clause 3 of Policy GWS1 sets out the exceptional circumstances where development on green spaces will be supported. Development will only be considered acceptable if:</p> <p>a. it will not create or increase publicly accessible green space deficiency (at any scale); and</p> <p>b. replacement green space is provided in Newham, which provides equivalent or better</p> |
|-------------|-----------------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|-------|-------|--|--|--|-------|--|---|--|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| | | | | | | | | | | | | | | | | | | | | | functionality, quality and quantity in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit; or c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents; or d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and i. delivers a high standard of design which complements the character and appearance of the green space; and ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and iii. is designed for people of all ages and physical abilities. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-238 | Environment Agency | | Reg19-E-238/022 | Green and Water Spaces | GWS1 Green spaces | | | GWS1.1g | | | | | | | | | | | GWS1: Green spaces We note that the wording for Point 1.g has been changed from 'requiring all development to consider from the outset the form, function, and extent of green infrastructure opportunities' to 'requiring all development to consider at the earliest opportunity the form, function, and extent of green infrastructure'. We are concerned that if green infrastructure needs are not considered from the outset, they risk being overlooked by developers. This could lead to planning applications being submitted with minimal green infrastructure, especially in areas around main rivers. Once a planning application is submitted, developers are often less willing to incorporate additional green infrastructure, or what is proposed tends to be of lower quality, as their plans are already detailed and costly to modify. By integrating these considerations from the outset, the occurrence of such issues could be reduced | Therefore, we strongly recommend changing the wording from 'at the earliest opportunity' back to ' from the outset '. The provision of green infrastructure is important as it can provide benefits for wildlife as well as people. We believe that this is especially important for Newham as section 3.205 of the Local Plan states that 'the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |
| Reg19-E-238 | Environment Agency | | Reg19-E-238/023 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | We are pleased to see that Point 4.d has been strengthened to read 'Where a development is providing publicly accessible green space, it should: maximise biodiversity, delivering a minimum 10 percent Biodiversity Net Gain | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-238 | Environment Agency | | Reg19-E-238/024 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | We would like to point out that the implementation table is missing a title for this policy section. | | A change to this policy approach has not been made. We did not consider this change to be necessary as this is a presentation error with the designed pdf version of the Local Plan and not the Local Plan word document approved at Cabinet on 4 June 2024 for consultation. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-238 | Environment Agency | | Reg19-E-238/025 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | We are pleased to see that a reference to Natural England’s Green Infrastructure Framework (GIF) has been included in the implementation section for GWS1.1. | | Support noted. |
| Reg19-E-238 | Environment Agency | | Reg19-E-238/026 | Green and Water Spaces | GWS1 Green spaces | | | | | GWS 1.4 | | | | | | | | | | Under the GWS1.4 implementation section titled ‘Connectivity’, it would be useful to mention that protecting wildlife access routes can improve the habitat availability and foraging capabilities of species. Green spaces can also provide connectivity between watercourses/blue spaces which will improve both habitat types.’ | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |
| Reg19-E-244 | One Newham | | Reg19-E-244/049 | Green and Water Spaces | GWS1 Green spaces | | | | | | | | | | | | | | West Ham Park Nursery Site GWS1: Green spaces Great that it will remain for this use and not housing | | <p>Support noted. The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, thereby removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--------------------|
| Reg19-C-023 | Bob Sharples | | Reg19-C-023/008 | Green and Water Spaces | GWS2 Water spaces | | | | | | Yes | Yes | | | | | | Yes | Sport England fully supports this policy as it has got a sound evidence base for the sports facilities: Built Leisure Needs Assessment (2024) which is referenced on pages 10 and 268 of this document. | | Support noted. |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | |
|-------------|----------------------------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|-------|-------|--|--|--|--|-------|--|--|---|
| Reg19-E-061 | Royal Docks Management Authority | | Reg19-E-061/002 | Green and Water Spaces | GWS2 Water spaces | | | | | | Blank | Blank | | | | | Blank | <p>5. RoDMA are tasked with maintaining, refurbishing and replacing the assets in the Docks. They do this by raising a service charge and also commercial income from operating the Docks. Every penny of profit gets re-invested. RoDMA has plans to increase the level of water activation and recreational use for the benefit of locals and visitors. Water activation in itself is a tenuous commercial model and is rarely successful without food & beverage outlets or other parallel commercial uses attached. RoDMA require other better commercial offerings, such as residential moorings and possibly floating hotels to cross subsidise and offset the limited income received from water activities. It is a careful balance. We need to make it economically possible to activate the water, and we need the Local Plan to provide a policy framework that allows for this.</p> <p>In this respect we note that the London Plan Policy SI17 requires Development Plans to identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.</p> <p>If one reads the SI16 and SI17 text integrally, it is very clear that the London Plan seeks to find a careful balance between:</p> <ul style="list-style-type: none">• Activating the water, and increasing public access and enjoyment of the water;• While balancing that with other functions, such as navigation;• While identifying some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity credentials etc); yet at the same time;• Also underlining the separate and very different characters that different bodies of water have - i.e. a large river (such as the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock. <p>The latter consideration seems to be overlooked in the Reg 19 Local Plan. This goes to the heart of the need for a bespoke policy approach to the Royal Docks.</p> | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |
| Reg19-E-061 | Royal Docks Management Authority | | Reg19-E-061/004 | Green and Water Spaces | GWS2 Water spaces | | | | | | Blank | Blank | | | | | Blank | <p>7. The Local Plan should support the consideration of water activation and appropriate development in the Royal Docks where it is sensible to do so and adds to the character and amenity value of the water for the benefit of all.</p> | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It</p> |

should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.

In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and therefore proposes the following has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy GWS2:

2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:

- a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and
- b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy (2024); including the requirements in the neighbourhood policies and site allocations; and
- c. **maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and**
- ed. requiring no **encroachment less** or covering of any water space unless it is a water-related or water dependent use. **Development proposals to impound or narrow water spaces will not be supported;** and
- ed. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and
- fe. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and
- gf. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and
- hg. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and
- ih. contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and
- ji. improving the safety and public use of the borough's water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.

The following wording change, to implementation point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---------------------|--|---|
| | | | | | | | | | | | | | | | | | | | | | <div><ul style="list-style-type: none">• Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in the encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft.</div> <div>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. and demonstrate that it will not compromise the suitability of the water space for water-related uses.</div> <div>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</div> <div>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</div> |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | |
|-------------|----------------------------------|---------|-----------------|------------------------|-------------------|--|--|--|--|--|-------|-------|--|--|--|--|-------|--|--|---|
| Reg19-E-061 | Royal Docks Management Authority | | Reg19-E-061/005 | Green and Water Spaces | GWS2 Water spaces | | | | | | Blank | Blank | | | | | Blank | 8. We have seen the comments on the Local Plan submitted by the GLA and are in full agreement with them, in particular the recognition of the different and unique characteristics of the docks compared to other water bodies and the suggestion for policy wording promoting the unique role of Royal Victoria Dock and the opportunity for water-related activation and uses. | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/107 | Green and Water Spaces | GWS2 Water spaces | | | | | | | | | | | | | No comment. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|------------------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--------------------|
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/12a | Green and Water Spaces | GWS2 Water spaces | | | | | | Yes | Yes | | | | | | | <p>The Authority maintains its support for Policies on [Green Space GWS1, and] Water Space GWS2 and welcomes the strengthening of policy GWS2 so as to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility as set out below. This should help to protect the quality and enjoyment of the water spaces within the Regional Park in Newham and their associated character, heritage and biodiversity.</p> <p>Policy GWS2.2 a. [and e]. as follows:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement</p> | | Support noted. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/12b | Green and Water Spaces | GWS2 Water spaces | | | | | | Yes | Yes | | | | | | | <p>The Authority maintains its support for Policies on [Green Space GWS1, and] Water Space GWS2 and welcomes the strengthening of policy GWS2 so as to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility as set out below. This should help to protect the quality and enjoyment of the water spaces within the Regional Park in Newham and their associated character, heritage and biodiversity.</p> <p>Policy GWS2.2 [a]. and e. as follows:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>[a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement]</p> <p>e. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain</p> | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|------------------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--------------------|
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/12c | Green and Water Spaces | GWS2 Water spaces | | | | | | Yes | Yes | | | | | | | <p>The Authority maintains its support for Policies on [Green Space GWS1, and] Water Space GWS2 and welcomes the strengthening of policy GWS2 so as to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility as set out below. This should help to protect the quality and enjoyment of the water spaces within the Regional Park in Newham and their associated character, heritage and biodiversity.</p> <p>...and under Policy GWS2 3b</p> <p>3. Applications for water-related or water-dependent facilities on or adjacent to water spaces will be supported where:</p> <p>b. it can be demonstrated that the activation of the water space is appropriately scaled and located and does not negatively impact on navigation, ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents.</p> | | Support noted. |

[illegible]

| | LB Newham Response | Proposed modifications and explanation | Representer Comment | Complies with Duty to Cooperate? | Consistent with the London Plan? | Consistent with the NPPF? | Effective? | Justified? | Positively prepared? | Sound? | Legally Compliant? | Implementation text | Justification | Clause | Introduction | Site allocation | Policy | Chapter | Comment Reference | Agent | Representer | Representation Reference |
|--|--------------------|--|--|----------------------------------|----------------------------------|---------------------------|------------|------------|----------------------|--------|--------------------|---------------------|---------------|--------|--------------|-----------------|--------|---------|-------------------|-------|-------------|--------------------------|
| | | | Policy SI 17 E) is particularly relevant, which states “Development proposals along London’s canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets”. Accordingly, we think it is important for the new Local Plan to better recognise the unique character of the Royal Docks and the different nature and functions of each dock. In particular, we suggest that the role of Royal Victoria Dock deserves a bespoke policy to provide a much clearer policy framework within which proposals can come forwards and be assessed. | | | | | | | | | | | | | | | | | | | |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | |
|-------------|-------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|-------|-------|--|--|--|--|-------|--|--|---|
| Reg19-E-178 | Royal Docks | | Reg19-E-178/038 | Green and Water Spaces | GWS2 Water spaces | | | | | | Blank | Blank | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule:</p> <p>This policy should place greater emphasis on the unique character of the Royal Docks compared to all the other water bodies in the Borough. The size and scale of the Royal Docks means that it is appropriate to take a different approach to achieve the outcomes of the policy. This includes more nuanced approaches to the use of the water, increasing access and amenity value, and the link between land and water. This is markedly different to the other water bodies in the Borough.</p> | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |
| Reg19-E-178 | Royal Docks | | Reg19-E-178/039 | Green and Water Spaces | GWS2 Water spaces | | | | | | Blank | Blank | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies</p> | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the design guidance you reference is not yet in the public domain. We have however sought to reflect the relevant elements of the draft Royal Docks design guidance in the Local Plan. This work informed the Regulation 19 Policy GWS2</p> |

| LB Newham Response | | | Proposed modifications and explanation | | Representor Comment | Complies with Duty to Cooperate? | Consistent with the London Plan? | Consistent with the NPPF? | Effective? | Justified? | Positively prepared? | Sound? | Legally Compliant? | Implementation text | Justification | Clause | Introduction | Site allocation | Policy | Chapter | Comment Reference | Agent | Representor | Representation Reference |
|--|--|--|--|--|--|----------------------------------|----------------------------------|---------------------------|------------|------------|----------------------|--------|--------------------|---------------------|---------------|--------|--------------|-----------------|--------|---------|-------------------|-------|-------------|--------------------------|
| implementation text. The Council is satisfied that the plan is sound without the proposed changes. | | | | | of the draft.] Detailed Comments Schedule: (Design) For the Royal Docks we would advocate the inclusion of the Design Guidance document from the work we've undertaken with DKCM to help provide a framework to ensure quality of development on the water in the Royal Docks. We are happy to work with you to explore how this can be implemented. | | | | | | | | | | | | | | | | | | | |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|-------------|--|-----------------|------------------------|-------------------|--|--|--|--|---------|-------|-------|--|--|--|--|--|-------|---|--|---|
| Reg19-E-178 | Royal Docks | | Reg19-E-178/042 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2.2 | Blank | Blank | | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: (King George V) The Plan should recognise the reality of the airports security requirements and the impact this has on the ambitions of the Plan. For example, GWS2.2 (Accessibility) should exclude KGV because public access is not achievable. The Plan should also reflect that the northern edge of Royal Albert Dock is already open to the public and the southern side is the airport.</p> | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |
| Reg19-E-178 | Royal Docks | | Reg19-E-178/043 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2.2 | Blank | Blank | | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies</p> | | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any</p> |

| | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---|
| | | | | | | | | | | | | | | | | | | | <p>of the draft.]</p> <p>Detailed Comments Schedule: Loss – the wording should be adjusted to allow the covering of water by floating structures (boats, pontoons, jetties, piers, etc) as these are essential to enabling use of the water.</p> | | <p>conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy GWS2:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and</p> <p>b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy (2024); including the requirements in the neighbourhood policies and site allocations; and</p> <p>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</p> <p>ed. requiring no encroachment loss or covering of any water space unless it is a water-related or water dependent use. Development proposals to impound or narrow water spaces will not be supported; and</p> <p>ed. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and</p> <p>fe. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and</p> <p>gf. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and</p> <p>hg. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and</p> <p>ih. contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and</p> <p>ji. improving the safety and public use of the borough’s water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.</p> <p>The following wording change, to implementation point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>Loss-Encroachment</p> <ul style="list-style-type: none">• Overshadowing reduces the recreational and biodiversity value of water space. Development in |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan ? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|-----------------------------------|----------------------------------|---------------------|--|--------------------|
| | | | | | | | | | | | | | | | | | | | | <p>proximity to water space should not result in the encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft.</p> <p>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. and demonstrate that it will not compromise the suitability of the water space for water related uses.</p> <p>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</p> | |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-178 | Royal Docks | | Reg19-E-178/044 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2.4 | Blank | Blank | | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: We would expect to see here reference to GLAP and the Royal Docks Team given the work to date that we have undertaken and that in relation to the Royal Docks (where the scope for moorings is most extensive) neither the PLA or the CRT have any jurisdiction.</p> | | <p>The Council's objective for this policy approach is to deliver a network of improved, high-quality water spaces. However, the Council recognises the importance of ensuring the Plan is clear and therefore has made the following wording change:</p> <p>GWS2.4 implementation text:</p> <p>We will work in partnership with the Port of London Authority and the Canal and River Trust, RoDMA, the Environment Agency, the GLA and other appropriate authorities and stakeholders, to determine the suitability of residential and visitor moorings. In coming to a decision, we will with consider:</p> <ul style="list-style-type: none">• Navigation,• Water quality,• Biodiversity,• Openness and character of the water space and surrounding area,• Surrounding residential amenity,• The adequate provision of supporting uses and facilities, including:<ul style="list-style-type: none">- Waste management (for example rubbish and sewage disposal)- Supply of adequate electricity including for heating (see Local Plan Policy CE6)- Supply of fresh water <p>AND</p> <p>GWS2.1 implementation text:</p> <p>Early engagement, with appropriate key stakeholders is encouraged. Timely engagement is important, it helps to ensure proposed developments align with wider priorities and these strategies. Development proposals in proximity to water space should incorporate work with the Council and our partners (including the Port of London Authority, the Canal and River Trust, Royal Docks Management Authority (RoDMA), the London Lea Catchment Partnership, Beam and Ingrebourne Catchment Partnership, the GLA and the Environment Agency), landowners and the community.</p> |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|--------------------------------|-----|-----------------|------------------------|-------------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---|
| Reg19-E-183 | ExCel and Mount Anvil | DP9 | Reg19-E-183/019 | Green and Water Spaces | GWS2 Water spaces | | | | | | | | | | | | | | <p>Policy GSW2 - Water Spaces</p> <p>As a key stakeholder in Royal Victoria Dock ExCeL fully recognise the special characteristics of the dock and the important contribution of the water to the strength of the wider Royal Docks visitor destination offer. Accordingly, ExCeL fully support the GLA's representations proposing a bespoke policy to promote the unique role of Royal Victoria Dock and the opportunity for water-related activation and uses, to provide a much clearer policy framework within which proposals can come forwards and be assessed.</p> | | <p>The Council's objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> |
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/058 | Green and Water Spaces | GWS2 Water spaces | | | | | | | | | | | | | | <p>As a key stakeholder in the Royal Docks TSP fully recognise the special characteristics of Royal Victoria Dock and Pontoon Dock and the important contribution of the water to the strength of the wider Royal Docks place making and visitor destination offer. Accordingly, TSP fully support the GLA's representations proposing a bespoke</p> | | <p>The Council's objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| | | | | | | | | | | | | | | | | | | | policy to promote the unique role of Royal Victoria Dock and Pontoon Dock and the opportunity for water-related activation and uses, to provide a much clearer policy framework within which proposals can come forwards and be assessed. | | <p>approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> |

| | | | | | | | | | | | | | | | | | | | |
|-------------|------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|--|--|--|--|--|--|---|---|
| Reg19-E-214 | Good Hotel | | Reg19-E-214/002 | Green and Water Spaces | GWS2 Water spaces | | | | | | | | | | | | | <p>Economic Reality and Activating the Water</p> <p>Water activation in an urban setting rarely happens without some form of impetus, usually commercial. It needs to be enabled and supported through forging strong partnerships combined with entrepreneurial spirit, and economic potential. Once a place of huge economic importance, the docks had sat practically empty for decades. Back in 2016 when Newham welcomed the floating Good Hotel to moor in the Western part of Royal Victoria Dock, there was limited infrastructure nor safe access onto the water. The hotel vessel has since been functioning as a community hub, providing fully accessible spaces supported by much needed infrastructure and facilities that can now be enjoyed from the water, as well as employing hundreds of local residents over the last 8 years. The siting of the hotel vessel has further helped provide protection from the wind on to the quayside. As such, Good Hotel is proud to have contributed to the ongoing regeneration of Royal Victoria Dock and help create a congenial visitor destination. If one looks at what else has happened around the Royal Victoria Dock since the Good Hotel arrived, the conclusion is unfortunately very little. We therefore strongly concur with RoDMA in their following analysis: <i>Water activation in itself is a tenuous commercial model and is rarely successful without food & beverage outlets or other commercial uses attached to encourage footfall. RoDMA require other better commercial offerings, such as residential moorings as well as floating hotels, with food and drink and meeting spaces which would help to cross subsidise and offset the limited income received from just water activities. It is a careful balance. We need to make it economically possible to activate the water, and we need the Local Plan to provide a policy framework that allows for this. In this respect we note that the London Plan Policy SI17 requires Development Plans to identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.</i></p> <p>If one reads the SI16 and SI17 text integrally, it is very clear that the intention of the London Plan has been to seek a careful balance between:</p> <ul style="list-style-type: none">• Activating the water, and increasing public access and enjoyment of the water;• While balancing that with other functions, such as navigation;• While identifying some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity credentials etc); yet at the same time;• Also underlining the separate and very different characters that different bodies of water have - i.e. a large river (such as the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock. | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities.</p> |
|-------------|------------|--|-----------------|------------------------|-------------------|--|--|--|--|--|--|--|--|--|--|--|--|---|---|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| | | | | | | | | | | | | | | | | | | | The latter consideration seems to be overlooked in the Reg 19 Local Plan. This goes to the heart of the need for a bespoke policy approach to the Royal Docks. | | |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/027 | Green and Water Spaces | GWS2 Water spaces | | | GWS2.2 | | | | | | | | | | | GWS2: Water spaces We note that the wording for this policy could be strengthened, and some points may seem to be advocating for increased development and engineering by edges of waterbodies, rather than reducing development in the riparian zone to protect and enhance the aquatic environments. The effects of development and urbanisation have resulted in a huge percentage of the UK's biodiversity to decline or disappear, especially related to river habitats. The policy on water spaces should influence developers to consider this from the outset, as well as environmental obligations for betterment, thereby supporting the UK to meet national and international targets on wildlife protection and recovery | We recommend making the following change to Point 2: Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including undeveloped areas of riparian buffer zone , riparian trees and wet woodland)(...). | Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore made the your wording change to GWS2.2: 2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including undeveloped areas of riparian buffer zone , riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through: which is included in the modification table |

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|--------------------|--|-----------------|------------------------|-------------------|--|--|--|---------|--|--|--|--|--|--|--|--|--|--|---|--|
| Reg19-E-238 | Environment Agency | | Reg19-E-238/028 | Green and Water Spaces | GWS2 Water spaces | | | | GWS2.2c | | | | | | | | | | <p>We note that what was Point 2.a has become Point 2.c and the policy wording has changed from ‘not result in the loss or covering of any water space unless it is a water-related or water-dependent use’ to ‘requiring no loss or covering of any water space unless it is a water-related or water-dependent use’. This policy implies that developers proposing water dependant uses can freely encroach into rivers and cover them, through culverting for example. Loss of water space is considered encroachment and should not be allowed even if it is for a water-dependent use. This can lead to increase in flood risk and loss of biodiversity</p> | <p>This point should be amended to read as follows ‘not result in the loss or covering of any water space unless it is a water-related or water-dependent use through culverting or encroachment. Developments involving culverting of the rivers will not be accepted, and opportunities to de-culvert should be explored and implemented where feasible’.</p> | <p>Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy GWS2:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and</p> <p>b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy (2024); including the requirements in the neighbourhood policies and site allocations; and</p> <p>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</p> <p>d. requiring no encroachment loss or covering of any water space unless it is a water-related or water dependent use. Development proposals to impound or narrow water spaces will not be supported; and</p> <p>ed. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and</p> <p>fe. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and</p> <p>gf. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and</p> <p>hg. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and</p> <p>ih. contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and</p> <p>ji. improving the safety and public use of the borough’s water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.</p> <p>The following wording change, to implementation point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>Loss-Encroachment</p> <ul style="list-style-type: none">• Overshadowing reduces the recreational and |
|-------------|--------------------|--|-----------------|------------------------|-------------------|--|--|--|---------|--|--|--|--|--|--|--|--|--|--|---|--|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan ? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|-----------------------------------|----------------------------------|---------------------|--|--------------------|
| | | | | | | | | | | | | | | | | | | | | <p>biodiversity value of water space. Development in proximity to water space should not result in the encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft. There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. and demonstrate that it will not compromise the suitability of the water space for water related uses.</p> <p>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</p> | |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|---|
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/029 | Green and Water Spaces | GWS2 Water spaces | | | GWS2.2e | | | | | | | | | | | We are pleased to see the council included the Point 2.e which states ‘maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3). It should be noted that BNG requires both a 10% gain in riparian AND watercourse units if the development is within 10m of a watercourse. We encourage the local authority to change policy/ guidance in order to reflect the requirement to provide 10% gain in riparian habitat. | We would also like to point out that often developers do not factor in the watercourse units when required, this should be highlighted in the policy as well as implementation section for point 2.e. | Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding the delivery of Biodiversity Net Gain and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to the implementation text for Policy GWS2. Implementation text: Biodiversity <ul style="list-style-type: none">• Schemes should maximise opportunities to incorporate existing habitats and vegetation.• Ensure watercourse Biodiversity Net Gain units are considered if a proposed development is within 10m of a watercourse, see Local Plan Policy GWS3 for further detail on delivering Biodiversity Net Gain.• Planting should include only species suited to the on-site conditions (types and maturities) and be managed appropriately to achieve maximum benefit for biodiversity and river health. Invasive non-native species must be avoided, and where possible, reduced.• External lighting should be designed to minimise light pollution and disruption to habitats and species. Low-level 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. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/030 | Green and Water Spaces | GWS2 Water spaces | | | GWS2.2g | | | | | | | | | | | We note that Point 2.e has become Point 2.g. In our Reg 18 response we stated that this policy requirement should be amended to include that ‘the setback should be 16 metres for intertidal/tidal waters measured from the landward side of the flood defence or an 8 metre setback is required and measured from the landward side of any flood defence.’. This change has not been made. | We suggest that the council makes the following modification to this policy: ‘providing suitable setbacks from water space edges 8 metres setback for fluvial watercourses and 16 metres setback for intertidal/tidal watercourses. Where defences are present setback should be measured from the landward side of any flood defence including any buried elements. This is necessary to mitigate flood risk, to protect the riparian buffer zone and habitat availability, supporting water quality, and to allow waterside walkways and cycle paths where appropriate | A change to this policy approach has not been made. We did not consider this change to be necessary as Policy CE7: Managing flood risk, addresses this point and the Plan should be read as a whole. The Council is satisfied that the plan is sound without the proposed change. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/031 | Green and Water Spaces | GWS2 Water spaces | | | GWS2.3b | | | | | | | | | | | | We recommend that Point 3.b is amended as follows: 'it can be demonstrated that the activation of the water space is appropriately scaled and located and does not negatively impact on flood risk , navigation, ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents. | Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to clause 3.b of Policy GWS2: b. it can be demonstrated that the activation of the water space is appropriately scaled and located and does not negatively impact on navigation, flood risk , ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/032 | Green and Water Spaces | GWS2 Water spaces | | | GWS2.4b | | | | | | | | | | | | We recommend that Point 4.b is amended as follows: 'it can be demonstrated that residential and visitor moorings are appropriately located and do not negatively impact on flood risk , navigation, water quality, the openness and character of the water space and the amenity of surrounding residents. | Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to clause 4.b of Policy GWS2: b. it can be demonstrated that residential and visitor moorings are appropriately located and do not negatively impact on navigation, flood risk , ecological value , water quality, the openness and character of the water space and the amenity of surrounding residents.. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/033 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2 | | | | | | | | | Implementation section comments: This section on re-naturalisation could also include setting back existing flood defences in order to create more space for water and biodiversity wherever feasible.This implementation section suggests including flood tolerant trees, bushes/shrubs and other plants. Where trees are proposed within close proximity to a tidal defence we would typically require an assessment on proximity to any structural elements of the defence. We may also ask for root protection to be included in order to protect the flood defence structure. We advise that this is mentioned in the implementation section. | The implementation section for GWS2.2 sates that 'River re-naturalisation will be encouraged (see Local Plan Policy CE7), wherever feasible'. We recommend that this is changed to the following 'River renaturalisation will be required encouraged (see Local Plan Policy CE7), wherever feasible'. | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/034 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2 | | | | | | | | | | The Environment Agency should be mentioned as a key stakeholder in the implementation section for GWS2.2 on accessibility. | A change to this policy approach has not been made. We did not consider this change to be necessary as the Council refers to the need to engage with key stakeholders in the implementation text to support clause 1 of Policy GWS2. This includes reference to the need to engage with the Environment Agency. The Council is satisfied that the plan is sound without the proposed change. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|-------------------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|--|
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/035 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2 | | | | | | | | | We are pleased to see that the section on biodiversity includes the following ‘Planting should include only species suited to the on-site conditions (types and maturities) and be managed appropriately to achieve maximum benefit for biodiversity and river health. Invasive non-native species must be avoided, and where possible, reduced | | Support noted. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/036 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2 | | | | | | | | | The section on flood risk provides information on buffer zone requirements. | The section should be updated to include the following: ‘Where defences are present setback should be measured from the landward side of any flood defence, including any buried elements’ | A change to this policy approach has not been made. We did not consider this change to be necessary as clause 3 of Policy CE7: Managing flood risk, addresses this point and the Plan should be read as a whole. The Council is satisfied that the plan is sound without the proposed change. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/037 | Green and Water Spaces | GWS2 Water spaces | | | | | GWS 2 | | | | | | | | | Finally we advise that the council incorporates further guidance regarding new Clippers/Ferry services. We expect that any proposals for new Clippers/Ferry services to be accompanied by a foreshore monitoring and mitigation strategy. | | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---|-------|-------------------|------------------------|---|-------------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|---|
| Reg19-C-007 | Joana Simoes | | Reg19-C-007/002 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | N10.SA3 Newham Leisure Centre | | | | | No | No | | | | | | No | [...] This is a low quality air management zone, with significant Green space and tree deficit, so the entire area should be turned into a Green lung, so that we can breathe, enhancing the Green space around the sports centre. [...]. | More green spaces not attached to 7 story new builds | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |
| Reg19-C-082 | Swifts Local Network: Swifts & Planning Group | | Reg19-C-082/001 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | Yes | No | | | | | | Yes | Supportive of GWS3.2 in principle but there is a typo in the Policy list on page 274. London Plan: Biodiversity & access to nature is policy G6 not a repeat of G5. | Correct G5 Biodiversity and access to nature, to state G6 . | <p>This error is noted. This has been rectified by making your wording change:</p> <ul style="list-style-type: none">• G5 G6 Biodiversity and access to nature <p>This is included in the modification table.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---|---------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-C-082 | Swifts Local Network: Swifts & Planning Group | | Reg19-C-082/002 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | Yes | No | | | | | | Yes | We support GWS3.1 to implement NPPG and London Plan G6 B4, but to make it sound and effective it should be clear that this policy should apply to all new developments including extensions. | Please add to GWS3.1: All new developments including extensions should include living building elements. | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan Glossary sets out in its definition of development that this refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to redevelopment, including refurbishment, as well as new development. The Council is satisfied that the plan remains sound without the proposed changes. |
| Reg19-E-033 | Thames Water | | Reg19-E-033/015 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | Blank | No | | | | | | Blank | <p>Thames Water object to the proposed amendment to Beckton Meadows South SINC (renamed as Beckton STW West SINC).</p> <p>Compared to the previous Local Plan proposals map, it appears that the areas of SINC's within Beckton STW have been extended to include additional areas;</p> <ul style="list-style-type: none">• Land to the South of Eric Clark Lane and to the north of ASP4.• It also appears that an additional area around the inlet works has been added. [see extracted map] <p>We consider that there is no technical evidence to support the change of boundary to the SINC. We object to the extended designation as it will have implications for any future development at the Beckton STW site within and adjacent to this SINC.</p> <p>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 the two SINC areas]. 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.</p> | Remove SINC designation at Beckton STW | A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. Please note Newham's SINC Review (2025) includes an update to amend an error not related to your comment. |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/061 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | Aims of the policy Supported. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------|------------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|---|
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/062 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.6 | | | | | | | | | | | Comment: First sentence of GWS3.6 implies blanket protection of Sites of Importance for Nature Conservation contradicting the remaining paragraph which implies development could result in harm. Flexibility upon such land where the harm is minimised and mitigated represents the most appropriate solution to ensure housing needs are met. | Suggested change to wording 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: a. Avoid damaging the significant ecological features of the site. b. Minimise the overall spatial impact andmitigate 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. | A change to this policy approach has not been made. We did not consider this change to be necessary as clause e6 of policy GWS3 clearly sets out the hierarchy which should be applied to development which would harm a Site of Importance for Nature Conservation. The hierarchy includes the delivery of off-site compensation, in Newham, of better biodiversity value. This policy is supported by Natural England. The Council is satisfied that the plan remains sound without the proposed changes. |
| Reg19-E-112 | SEGRO | Gerald Eve | Reg19-E-112/023 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | Blank | No | | | | | | Blank | SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 6(a)) and welcomes the removal of reference to a ‘bespoke Newham Urban Greening Factor’ under point 5 of the draft policy [see Appended – Regulation 18 Draft Local Plan SEGRO response]. | | Support noted. |
| Reg19-E-166 | Natural England | | Reg19-E-166/002 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | <u>Policy GWS3: Biodiversity, urban greening and access to nature</u> Natural England are supportive of this policy which outlines that new development in Newham should contribute towards nature recovery in Newham. Natural England support Newham’s commitment to new development proposals providing a minimum of 10% biodiversity net gain across the borough and that this should be secured for a minimum of 30 years. We welcome the commitment to the delivery of on-site net gain provision before delivery off-site, in line with the Biodiversity Gain Hierarchy. On-site provision can help to provide biodiversity gains close to where a loss may have taken place or is proposed and can increase access to nature for local communities. | | Support noted. |
| Reg19-E-166 | Natural England | | Reg19-E-166/003 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | Part 7 of this policy refers to Epping Forest Special Area of Conservation (SAC). We would advise that this policy could be strengthened, as all new development that leads to a net increase in residential units within 6.2km of Epping Forest SAC is considered to give rise to the possibility of likely significant effect. Therefore, measures to avoid and mitigate the effects must be delivered to ensure no adverse effect on the integrity of Epping Forest SAC. | To further strengthen this policy, it could state that the council will only permit development where it is satisfied that it will not give rise to adverse effects on integrity of Epping Forest SAC either alone or in-combination. | Comment noted. This comment has been subject to further discussion with Natural England and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---|---------------------|-------------------|------------------------|---|-----------------|--------------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/13 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | Evidence Base list | | | | Yes | Yes | | | | | | | The Authority maintains its support for policy GWS3 Biodiversity Urban Greening and Access to Nature. This should, together with the strengthening of policy GWS2 which requires applications and development affecting and/or adjacent to water space to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility, help to protect the biodiversity of the water spaces within the Regional Park in Newham. | | Support noted. |
| Reg19-E-171 | Lee Valley Regional Park Authority | | Reg19-E-171/14 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | Evidence Base list | | | | Yes | Yes | | | | | | | Reference to the Authority’s Biodiversity Action Plan 2019 – 2029 should be included as part of the Evidence Base list provided for this section of the Plan. It is noted that the Council intended to include this reference but it is not evident in the list on page 274. Reference has however been made to the Authority’s Landscape Strategy which is welcome. | One addition is required under Policy GWS3. Reference to the Authority’s Biodiversity Action Plan 2019 – 2029 should be included as part of the Evidence Base list provided for this section of the Plan. It is noted that the Council intended to include this reference but it is not evident in the list on page 274. | Comment noted. This comment has been subject to further discussion with Lee Valley Regional Park Authority and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments the Council recognises the importance of ensuring the Plan is clear. The typo is noted, an update will be made to the evidence base for Policy GWS3 to include reference to the Lee Valley Regional Park, Biodiversity Action Plan, 2019 - 2029 (2019), which is included in the modification table. |
| Reg19-E-181 | LAMIT c/ CCLA Investment Management Ltd | Rolfe Judd Planning | Reg19-E-181/007 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | Blank | Blank | | | | | | Blank | [Key Emerging Policies The following draft policies are relevant to the Alpine Way site:] GWS3 (Biodiversity, urban greening, and access to nature) emphasizes the importance of enhancing biodiversity, urban greening, and public access to nature in Newham. For the Beckton Alps SINC, the policy prioritizes the protection of existing habitats, improvement of green corridors, and biodiversity net gains in development. The site is located in an area deficient in access to nature, underscoring the need for ecological enhancements and new public green spaces. | | Comment noted. |
| Reg19-E-185 | Hadley Property Group | Deloitte | Reg19-E-185/027 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | No | No | | | | | | No | Policy GWS3: Biodiversity, urban greening, and access to nature Hadley is supportive of updates to the policy following earlier comments for the Urban Greening Factor to now be in-line with the London Plan requirements. | | Support noted. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/063 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | No | | | | | | | Policy GWS3 Biodiversity, urban greening and access to nature 9.7 St William continues to support the principle of the requirement for development to contribute to nature recovery in the Borough by protecting and enhancing biodiversity (green and water). | [Appendix 12: General Policies – Suggested amendments] | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------------|-------|-------------------|------------------------|---|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/064 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.1a | | | | No | | | | | | | 9.8 However, in line with previous comments and in relation to GWS3 Part 1(a) it should be noted that replacing lost features within the development site may not always be possible particularly in the case of former gasworks sites which must be fully remediated to enable their redevelopment and make them safe for public access. The proposals at Beckton Riverside, and the Bromley by Bow former gasworks, which secured resolution to grant in June 2024 is an example of this where the existing SINC and ecology must be removed to facilitate remediation of the Site. St William remain committed to enhancing and improving biodiversity value on-site however where there is such a loss through the remediation process this can be challenging and alternative off-site options must be considered. Whilst the delivery of on-site biodiversity enhancements should be prioritised, policy wording must also recognise that in some instances, off-site mitigation and compensation is necessary on many brownfield sites, in line with the hierarchy. | [Appendix 12: General Policies – Suggested amendments] 1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity (green and water). This will be achieved through: a. protecting existing habitats and features of biodiversity value. If this is not possible, replacing lost features within the development site, where feasible and delivering improved biodiversity value; | A change to this policy approach has not been made. We did not consider this change to be necessary as this policy is supported by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. Green and water infrastructure provision across Newham is poor relative to other London Boroughs. Newham's green and water infrastructure delivers essential ecosystem services to the Borough. These benefit flows need to be sustained if Newham's ecology and the people living and working there are to thrive. Clause 1 of Policy GWS3 acknowledges that natural features may be lost though development but that these need to be replaced within the development site. This policy approach is supported by Natural England. The Council is satisfied that the plan remains sound without the proposed changes. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/065 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.3 | | | | No | | | | | | | 9.9 Part 3 requires new or improved green or water spaces in areas deficient in access to nature to have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation. St William consider this requirement to be too onerous and not aligned with any relevant regional or national policy. | [Appendix 12: General Policies – Suggested amendments] 3. Development in areas deficient in access to nature should 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. | A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy and Newham's SINC Review. This approach is supported by Natural England and the Environment Agency. The Council is satisfied that the plan is/remains sound without the proposed changes. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/066 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.4 | | | | No | | | | | | | 9.10 Part 4 of the policy sets out the requirements for Biodiversity Net Gain (10%) and the requirement for this to be on-site and where that is not possible off-site within the Borough before considering out of borough. It states that out of borough sites will only be considered where it can be demonstrated that there are insufficient sites and credit schemes in the Borough to deliver the required net gain. Whilst St William are supportive of the principles outlined in this policy, the approach relies upon a thorough stock stake of available and potential off-site habitats (for off-setting) within the borough to ensure they are of suitable characteristics to accommodate the BNG provision. St William has suggested that the wording of this policy is revised to remove reference to 'insufficient sites' so that the focus can be on credit schemes. | [Appendix 12: General Policies – Suggested amendments] 4. Development must deliver a Biodiversity Net Gain of at least 10 per cent. All opportunities should be explored to deliver Biodiversity Net Gain on-site Where it can be demonstrated that on-site net gain is not possible, applicants must seek to deliver their off-site Biodiversity Net Gain in Newham. Out of borough registered of site Biodiversity Net Gain will only be accepted where it can be demonstrated there are insufficient sites and credit schemes in Newham to deliver the required net gain. | A change to this policy approach has not been made. We did not consider this change to be necessary as clause 4 of Policy GWS3 clearly sets out the hierarchy which should be applied to the delivery of Biodiversity Net Gain (BNG). The hierarchy includes the delivery of BNG off-site. This policy is supported by Natural England. The Council is satisfied that the plan remains sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------------|-------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/067 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.7 | | | | No | | | | | | | 9.11 Part 7 of this policy relates to the Epping Forest Special Area of Conservation and its protection and enhancement. Part 7b refers to contributions for the provision of Suitable Alternative Natural Greenspace and does not mention on-site measures that have the potential to reduce requirements. As currently drafted this suggests that both contributions and on-site reduction measures are required however it should be reasonable to assume this one or the other should be sufficient. | [Appendix 12: General Policies – Suggested amendments] 7. The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through: a. developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and or b. developments of new net additional residential homes contributing to the provision of Suitable Alternative Natural Greenspace. | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to Policy GWS3 is justified by up to date evidence base, through Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025) and The Epping Forest Strategic Access Management and Monitoring Strategy (2022). The Council has a legal duty to ensure that planning application decisions comply with the Habitats and Conservation of Species Regulations 2017 (as amended) to protect the integrity of Epping Forest SAC.</p> <p>Local authorities, such as Newham, falling within a 6.2km recreational zone of influence, are required to collect financial planning obligations to mitigate the harmful impacts by visitors to Epping Forest SAC.</p> <p>Newham has been working with the City of London and neighbouring authorities in London and Essex to develop a joint governance and delivery approach to develop a package of mitigation measures which fall into two categories:</p> <p>1. Strategic Access Monitoring and Management (SAMM) Strategy, which was adopted by Cabinet in July 2022. This is the tariff payment identified in Policy GWS3.7a.</p> <p>2. Suitable Alternative Natural Greenspace (SANG) Strategy, which is currently being developed and will be published as additional guidance. This is the tariff payment identified in Policy GWS3.7b.</p> <p>Natural England's position remains that all development leading to a net increase in residential units within 6.2km of Epping Forest SAC should provide contributions to both SAMM and SANG. The Council is satisfied that the plan is sound without the proposed changes.</p> |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/068 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | No | | | | | | | 9.12 Overall, St William considers this policy to not be effectively prepared and therefore failing to meet the tests of soundness set out in the NPPF. | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy and Newham's SINC Review. Green and water infrastructure provision across Newham is poor relative to other London Boroughs. Newham's green and water infrastructure delivers essential ecosystem services to the Borough. These benefit flows need to be sustained if Newham's ecology and the people living and working there are to thrive. The approach to GWS3 is supported by Natural England and the Environment Agency. The Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------------------|-------|-------------------|------------------------|---|-----------------|--------------|---------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|---|
| Reg19-E-200 | London City Airport | | Reg19-E-200/046 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.1e | | | | | | | | | | | LCY previously stated that aviation safety should take precedent over biodiversity measures. This should be reflected in the sentence structure. This comment remains, although it is also supported that the Safeguarded Area is referenced rather than the previously referenced Public Safety Zone. | Replace paragraph e. with the following: “Where an aviation safety case allows, allowing biodiversity enhancement measures within the London City Airport Safeguarded Area.” | <p>We did not consider this change to be necessary as Policy GWS3 1.e adequately addresses the need to deliver appropriate biodiversity measures within the London City Airport Safeguarded Area. The Council is satisfied that the plan remains sound without the proposed change.</p> <p>However, the Council recognises the importance of ensuring the Plan is cleat and therefore proposes the following wording change:</p> <p>e. maximising biodiversity measures within the London City Airport Safeguarded Safe Guarded Area, whilst also ensuring that the airport is appropriately safeguarded from bird strikes; and</p> <p>which is included in the modification table.</p> |
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/059 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | This policy aligns with the legislative framework requiring biodiversity net gain and therefore it is generally supported by TSP. TSP also agrees with submitting ecological assessments to support major development. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|------------|-------------------|------------------------|---|-----------------|--------------|----------------------------------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-222 | Ballymore | Rolfe Judd | Reg19-E-222/074 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | Proposals Map - SINC designation | | | | | | | | | | | <p>Proposals Map</p> <p>We also are concerned to continually note that the SINC designation on the southwestern portion of the site despite our previous comments in the Regulation 18 consultation. The changes to the SINC designation appear to have been applied on the basis of the area contains existing planting but no justification to why these areas are of such an importance to be designated.</p> <p>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. No evidence has been provided to support the provision of the SINC allocation and it appears to be predicated on the assumption it has value purely by being an open space. Given the SINC designation places a significant burden on the wider site allocation and could impact delivery we strongly consider that it should be removed.</p> | | <p>A change to this policy approach has not been made . We did not consider this change to be necessary as the policy approach has been justified by up to date evidence base, through Newham’s Sites of Importance for Nature Conservation Review.</p> <p>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.</p> <p>Newham’s SINC review made amendments to the extent of the SINC NEB16 The Greenway, which runs along the southern boundary of the N8 SA8 Bridgewater Road site allocation. 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).</p> <p>However, the Council recognises the importance of ensuring the SINC Review is clear to use. Therefore, Newham's SINC Review (2025) includes an update to amend the scale of the Greenway SINC mapping (SINC NEB16) to make it more legible to the reader.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------|-------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-E-238 | Environment Agency | | Reg19-E-238/038 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | GWS3: Biodiversity, urban greening, and access to nature In our Reg 18 response we said that we are pleased to see the Urban Greening Factor (UGF) requirements of London Plan Policy G5 are recognised in GSW3.5. We also added that the Natural England’s Green Infrastructure Framework should be referenced here and used to inform implementation guidance. We note that the framework has been referenced in the evidence base but there is no mention of it in the policy or implementation section. | | <p>Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change:</p> <p>GWS3.5 GWS3.4 Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Development proposals must secure a net gain in biodiversity value, with a clear priority for on-site measures. Development should use the latest Department for Environment, Food & Rural Affairs metric to quantify the baseline and post-development biodiversity value of the development site and of-site areas proposed for habitat creation. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should be submitted together with baseline and proposed habitat mapping in a digital format with the application.</p> <p>Any of-site habitats created should be provided in the borough and be located to maximise opportunities for local nature recovery and to improve access to nature.</p> <p>Biodiversity Net Gain should not applied to irreplaceable habitats. Any mitigation and/or compensation requirements for designated sites should be dealt with separately to Biodiversity Net Gain provision.</p> <p>Applicants should refer to the latest government legislation and guidance and the Mayor of London’s Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to ensure proposed green infrastructure achieves a Biodiversity Net Gain.</p> <p>Please also see Natural England’s Green Infrastructure Framework (GIF): https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx. The GI Framework provides a number of tool and guides to complement the mandatory mechanisms of Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), which form part of the Environment Act.</p> <p>which is included in the modification table</p> |
| Reg19-E-238 | Environment Agency | | Reg19-E-238/039 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.4 | | | | | | | | | | | We are pleased to see that the council has changed the wording of Point 4 from ‘Development should deliver a Biodiversity Net Gain’ to ‘Development must deliver a Biodiversity Net Gain’. | However the council had omitted a part of the policy which states ‘secured in perpetuity (at least 30 years)’. ‘Secured in perpetuity (for at least 30 years)’ is a key element of BNG and should be incorporated back into the plan. | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/040 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | GWS3.4 | | | | | | | | | | | This section should seek to encourage developers to consider BNG and the 30-year management obligation from the initial inception of the development idea, particularly when considering location and the possibility of achieving on-site improvements in biodiversity. Furthermore, In order to secure the maximum benefit for both people and the environment, schemes should consider the ecological value of a given site at the conceptual stage of a development proposal, considering the potential to achieve on-site net gains in biodiversity (BNG), protect and enhance the existing ecology, and incorporate environmental benefits throughout all stages of the development process. This addition should be incorporated into the policy. | | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/041 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | In our reg 18 response we said that it is important to also mention other benefits that biodiversity net gain can bring such as improving the water environment and preventing deterioration of water bodies in line with WFD requirements, managing flood risk and addressing climate risks. It does not appear that there is mention of these wider benefits in the Reg 19 submission. | | Comment noted. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes. |
| Reg19-E-238 | Environm ent Agency | | Reg19-E-238/042 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | Finally, it looks like there has been a typing error in this section ‘Where it can been demonstrated’. | | <p>Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and has therefore made the your wording change, to address the missing full stop:</p> <p>4. Development must deliver a Biodiversity Net Gain of at least 10 per cent. All opportunities should be explored to deliver Biodiversity Net Gain on-site. Where it can been demonstrated that on-site net gain is not possible, applicants must seek to deliver their of-site Biodiversity Net Gain in Newham. Out of borough registered of site Biodiversity Net Gain will only be accepted where it can be demonstrated there are insufficient sites and credit schemes in Newham to deliver the required net gain.</p> <p>which is included in the modification table</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------------------|---------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-E-238 | Environment Agency | | Reg19-E-238/043 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | The Policy section covers BNG in Point 4 and Urban Greening Factor (UGF) in point 5, however the implementation section for GWS3.4 seems to discuss UGF while the implementation section for GWS3.5 seems to discuss BNG. | | Comment noted. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change: The order of GWS3.5 and GWS3.4 implementation text needs to be switched. which is included in the modification table |
| Reg19-E-244 | One Newham | | Reg19-E-244/050 | Green and Water Spaces | GWS3 Biodiversity , urban greening and access to nature | | | | | | | | | | | | | | Biodiversity Net Gain GWS3: Biodiversity, urban greening, and access to nature This policy approach has now changed to better reflect the Environment Act 2021 and the requirement for a minimum 10 per cent Biodiversity Net Gain (BNG). This is something that the community garden network is focusing on and are disappointed that this is low. A target of 15 or 20% is not negligible & could make an impact - as well as being achievable | | Support noted. |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/063 | Green and Water Spaces | GWS4 Trees and hedgerows | | | GWS4.1 | | | | | | | | | | | 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 where possible, including street trees; | A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS4 sets out the requirements where there are exceptional circumstances to justify the loss of trees. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/064 | Green and Water Spaces | GWS4 Trees and hedgerows | | | GWS4.3 | | | | | | | | | | | | Suggested change to wording: c. safeguard existing Category A and B trees where possible, hedgerows and vegetation which are to be retained, both onsite and adjacent, including provision of appropriate protection during demolition and during the construction phase; and | A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS4 sets out the requirements where there are exceptional circumstances to justify the loss of trees. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/060 | Green and Water Spaces | GWS4 Trees and hedgerows | | | | | | | | | | | | | | This policy confirms that development should protect and deliver a network of improved tree stock and canopy cover to increase a healthy and balanced tree population. TSP supports the principles of this policy and as part of the HPA, soft landscaping has been proposed to green the Site appropriately. In particular, the acceptance that tree removal can occur where adequately replaced (part 2) is strongly supported and reflected in the HPA proposals. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------|-------|-------------------|------------------------|---|-------------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-C-007 | Joana Simoes | | Reg19-C-007/001a | Green and Water Spaces | GWS5 Play and information recreation for all ages | N10.SA3 Newham Leisure Centre | | | | | No | No | | | | | | No | <p>What is duty to cooperate? That language is not accessible. In my eyes the plan fails the rights of the children as per the United Nations convention that was signed by the UK 34 years ago.</p> <p>It fails to comply with article 31, not include enough play spaces and opportunities for development and recreational activity as per newham’s duty to provide, there is only mention of one skatepark being created in beckon, which is not enough, not near enough for a majority of the teenagers, from a 15 minute city angle, as it is on a corner south of the borough. and it does not have any state of the art new play parks, as it is recommended on the Green and water strategy that Newham creates 105 hectares of play space, which your plan does not comply with, namely Newham leisure centre area is a “site of interest” and is Newham land which will be sold to developers for the creation of a 7 story high rise which is not aligned with the prince regents’s victorian low rise. This is a low quality air management zone, with significant Green space and tree deficit, so the entire area should be turned into a Green lung, so that we can breathe, enhancing the Green space around the sports centre.</p> | <p>[...] 4 skateparks for teenagers on 4 areas, as Hackney have Don’t sell Newham land to developers, namely the Newham leisure centre Create a wonderful park in this area, with more play pitches, a skatepark, great accesses by the back and front.</p> | <p>The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such, we have made wide-ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to play space and green space is justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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. Policy GWS1 and GWS5 address the need to protect and deliver more green and play space. The findings of the study have also been used to inform the site allocation and specific needs for green space, growing space and play space have been set out in their infrastructure requirements. Policy GWS4 addresses the need to protect and provide more trees in Newham. The Council is satisfied that the plan is sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------|---------|-------------------|------------------------|---|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-C-007 | Joana Simoes | | Reg19-C-007/001b | Green and Water Spaces | GWS5 Play and information recreation for all ages | | | | | | No | No | | | | | | No | <p>The current plan does not have significant improvements in play space, specially for over 8 year olds, there is not a play park that is adequate for that age group. As Newham has a very young population of young people and teenagers, I believe 36% of the population is under 25, there is no recreational and sports activities for them. According to the Strategic needs assessment, 46% of Newham children are obese at the end of year 6, and the type 2 diabetes prescriptions are the highest in the country.</p> <p>[...]</p> <p>Newham had 27 stabbing which involved young people, in the last 2 years. Some were fatal. Each fatal stabbing, according to victims UK cost the task payer 3 million pounds. A state of the art skate park cost just over 100 k, so there would be a bargain, if it can provide teenagers with positive constructive healthy outlets, having spaces to hang out.</p> <p>I would further argue that there are many Newham residents and children with severe asthma and hospital admissions in London have doubled. We absolutely should invest in the creation of leafy Green parks, rather than cement in every already overpopulated corner.</p> | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to play space and green space is justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. The Green and Water Infrastructure 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. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Policy GWS1 and GWS5 address the need to protect and deliver more green and play space. The findings of the study have also been used to inform the site allocation and specific needs for green space, growing space and play space have been set out in their infrastructure requirements. In the Green and Water Spaces chapter Policy GWS4 addresses the need to protect and provide more trees in Newham.</p> <p>The need to improve air quality is recognised through clause 4.g of Policy GWS1 which sets out that schemes should demonstrate how they improve local air quality, through species selection and the layout of landscape features. Air quality is also a feature of GWS4, which, in its implementation text, requires applicants to consider how trees and hedges can be used to improve local air quality. Clause 2.c of Policy GWS5: Play and informal recreation for all ages, sets out that new play and informal recreation facilities should be designed to meet the needs of Newham's population by reducing the harm caused by poor air quality through the favourable location of play and informal recreation facilities away from busy roads or other high pollution areas. Where this is not possible, it must be demonstrated, to the Council's satisfaction, that the provision of appropriate mitigation (such as careful layout and choice of soft landscaping) will minimise exposure to pollutants. Local Plan Policy CE6: Air quality specifically addresses the need for all developments to mitigate and improve Newham's poor air quality. The Council is satisfied that the plan is sound without the proposed changes.</p> |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/065 | Green and Water Spaces | GWS5 Play and information recreation for all ages | | | | | | | | | | | | | | <p>Aims of the Policy Supported. Development of the Site will enable the delivery of informal play and recreation facilities not currently present on the Site.</p> | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------------------|---------|-------------------|------------------------|---|----------------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|---|
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/061 | Green and Water Spaces | GWS5 Play and information recreation for all ages | | | | | | | | | | | | | | In principle, TSP agrees with the core objectives of the policy. However, clarity is sought in respect of Part 2a as to what the plan means when it says ‘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. Major applications run consultation with the local population and various stakeholders, pre submission and during the application on the design of the scheme. TSP questions the need for the potential additional workshops for this to take place. | | A change to this policy approach has not been made. A change to this policy approach has not been made. We did not consider this change to be necessary as co-design is key to delivering the Council's objective of a People powered Newham and widening participation in the life of the borough and the work that the Council does. Policy BFN2 sets out further detail regarding the Local Plan’s approach to co-design and masterplanning. The implementation text to clause 2 sets out a commitment to review Newham’s Statement of Community Involvement, following the Local Plan adoption, to provide further detail on co-design in planning and development. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/005 | Neighbourhoods | N13 East Ham | New Site | | | | | | | | | | | | | It is relevant to note, when considering the draft Local Plan, that on 30th July 2024, the incoming Labour Government published a consultation draft of the revised NPPF, this was also accompanied by an updated Standard Method formula and Written Ministerial Statement (WMS). The updated NPPF removes the use of the Standard Method as “an advisory starting point for establishing a housing requirement of an area.” 1.7 The updated NPPF also introduces the ‘Grey Belt’ defined as “land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes.” 1.8 Whilst MOL is a local designation to London, it is of equal status to the Green Belt and thus we would expect the Grey Belt to apply equally to MOL. | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan will be examined under the 2023 NPPF. Therefore, concerns regarding an interpretation of grey belt and its potential relevance to this site or its application to London Plan Metropolitan Open Land are not relevant to the examination of this Local Plan, Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-083 | Aston Mansfield | Savills | Reg19-E-083/082 | Neighbourhoods | N13 East Ham | New Site | | | | | | | | | | | | | The updated NPPF also introduces the ‘Grey Belt’ defined as “land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes.” 5.4. Whilst MOL is a local designation to London, it is of equal status to the Green Belt and thus we would expect the Grey Belt to apply equally to MOL. | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan will be examined under the 2023 NPPF. Therefore, concerns regarding an interpretation of grey belt and its potential relevance to this site or its application to London Plan Metropolitan Open Land are not relevant to the examination of this Local Plan, Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment. The Council is satisfied that the plan is sound without the proposed changes. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/127 | Neighbourhoods | N13 East Ham | N13.SA3 Former East Ham Gasworks | | | | | | | | | | | | | Map § The map, illustrated in Figure 15.5 [see pg 50] below does not identify the previously developed land, and incorrectly applies a green wash across the whole site. | [Appendix 15: N13.SA3 Former East Ham Sports Ground Leigh Road East Ham – Suggested amendments] [map] The map does not identify the previously developed land, and incorrectly applies a green wash across the whole site. | Error is noted. This has been rectified by proposing the following mapping change: Correct green space at N13.SA3 Former East Ham Gasworks on Key Diagram Correct green space at N13.SA3 Former East Ham Gasworks on Polices Map |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|---------------|-------------------|----------------|--------------------|---------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|--|
| Reg19-E-192 | Abrdn | Montagu Evans | Reg19-E-192/029 | Neighbourhoods | N17 Gallions Reach | N17.SA1 Beckton Riverside | | | | | No | No | | | | | | Yes | <p>Green Space [and Industrial Buffering]</p> <p>abrdn supports the principle of providing opportunities for green space [and industrial buffering], as shown at Figure 4 below. However, abrdn consider that the extent of the proposed opportunity for green space [and industrial] is too large, most notably at GRSP.</p> <p>abrdn notes this area encompasses a significant portion of the Tall Building Zone (maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys)) and that the extent of green space [and industrial buffering] currently proposed would severely impact the quantum of development at the strategic development. This development is key to funding the DLR extension.</p> <p>[Image inserted - Figure 4: N17.SA1 Beckton Riverside indicative proposals map]</p> | <p>In light of this, abrdn proposes that the extent of the opportunity for [industrial buffering] and green space is reduced – especially given that any plots that come forward will each be required to meet their own environmental and biodiversity net gain requirements. An area of land for the purposes of [industrial buffering] and green space to the extent currently proposed within the Draft Submission Local Plan would have a major impact on housing numbers, result in a severely limited development footprint and a potentially unviable masterplanned scheme at GRSP – thus potentially compromising the DLR business case. The extent and scale of opportunity for green space and [industrial buffering] should be more consistent with that proposed within the adopted Royal Docks and Beckton Riverside OAPF (Figure 2.29 of the OAPF), this is shown below at Figure 5.</p> <p>[Image inserted - Figure 5: Strategic Vision - Royal Docks and Beckton Riverside Beckton Riverside OAPF]</p> | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for the site to address green space deficiencies and improve the quality and functionality of green space is justified by up to date evidence, through Newham’s Green and Water Infrastructure Strategy. Increasing public access and the functionality of existing green space across the neighbourhood a key part of the N17 Gallions Reach neighbourhood vision.</p> <p>Development in the neighbourhood will be assessed against any site allocation requirements, the neighbourhood policy and against Local Plan policies GWS1, GWS2 and GWS3 which provide further detail on access to green space. Development on this site will be expected to provide onsite green space and play space provision in accordance with both the requirements of London Plan Policy 2021 Policy S4 and Local Plan Policies GWS5.</p> <p>It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement. In addition, Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach.</p> <p>The quantity and type of green space stipulated in the Local Plan’s site allocations has been informed by the Green and Water Infrastructure Strategy. The specific detail regarding how that green space is designed and delivered, across the site allocation, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage. The Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------------|-------|-------------------|----------------|-------------------|-------------------------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|--|
| Reg19-E-183 | ExCel and Mount Anvil | DP9 | Reg19-E-183/011 | Neighbourhoods | N2 Royal Victoria | N2.SA5 Excel Western Entrance | | | | | | | | | | | | | The terminology ‘Opportunity for Green Space’ is also inconsistent with the primary objectives for the reconfiguration, consolidation and enhancement of the space proposed in the Site Allocation,. | | <p>The Council’s objective for this policy approach is to increase public access to and enhancing the functionality and flexibility, while retaining the quantity of existing green and open space. This is a key part of the N2 Royal Albert North neighbourhood vision and is justified by up to date evidence, having been informed by Newham’s Green and Water Infrastructure Strategy. The development principles for each allocation set out the requirements that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered.</p> <p>However, the Council recognises the importance of ensuring the Plan is clear and therefore made the following wording changes:</p> <p>N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge., and reconfigure Royal Victoria Square to be reconfigured at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1.</p> <p>N2.SA5 Infrastructure Requirements: Development should protect existing open space and address open space deficiency by re-providing and enhancing Royal Victoria Square Civic Space as a consolidated and flexible open space. The consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value. The open space provision should prioritise community growing opportunities.</p> <p>which are included in the modification table.</p> |
| Reg19-E-183 | ExCel and Mount Anvil | DP9 | Reg19-E-183/13 | Neighbourhoods | N2 Royal Victoria | N2.SA5 Excel Western Entrance | Policies Map | | | | | | | | | | | | Reg 19 Policies Map – Green Space The Reg 19 Policies Map also seeks to designate the majority of the Site Allocation as Green Space. As with the Site Allocation map, the extent of Green Space on the Policies Map is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren’t then identified for any protection/allocation on the Reg 18 Local Plan Policies Map. Given the Site Allocation proposes the reconfiguration and consolidation of the open space, we do not think it is then appropriate for the Policies Map to then designate and protect the entirety of the existing open space as ‘Green Space’. This creates a direct conflict with the intent of the Site Allocation, prejudicing the ability to bring the site forwards for development at all. | As such, we recommend that the Policies Map is updated to remove the Green Space allocation from the Site in its entirety, consistent with the approach at Reg 18 stage, as the Site Allocation map better serves the purpose of identifying the potential location for the reconfigured and consolidated open space (subject to the amendments we have recommended above). | A change to this policy approach has not been made. We did not consider a change to be necessary as the designation of green space on this site is justified by up to date evidence base, having been informed by Newham’s Green and Water Infrastructure Strategy. The Council is satisfied that the plan remains sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|--------------------------------|-------|-------------------|------------------------|-------------------|-------------------------|-----------------------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|---|--|
| Reg19-E-202 | The Silvertown Partnership LLP | DP9 | Reg19-E-202/014 | Neighbourhoods | N2 Royal Victoria | N2.SA1 Silvertown Quays | Infrastructure Requirements | | | | | | | | | | | | TSP supports the requirement to address open space deficiency within the local area. The HPA proposes the delivery of a minimum of 4.151 hectares of open space across the masterplan, distributed across a range of different types of spaces including public squares, parks and smaller green spaces. | However, the requirement for a ‘consolidated local park with a minimum area of 2 hectares’ should be removed as this is inconsistent with the HPA masterplan. A single local park is not considered to be the most effective means of addressing open space deficiency in the area because it would not provide the diversity of green / open spaces required across the development site which will provide variety and convenient accessibility to future residents and the wider Royal Docks community. It is also considered that the policy should not specifically require prioritisation of community growing facilities over other forms of open space, as space for play and recreation are vital to providing for the future community on site. | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as scale and type of play space needed on this site has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy.</p> <p>Site allocation N2.SA1 is required to address open space deficiency by providing a consolidated local park with a minimum area of 2 hectares to service nearby residential neighbourhoods. The open space provision should prioritise community growing opportunities.</p> <p>Development will be assessed against the site allocation requirements and Local Plan Policy GWS1. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement. In addition, Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach.</p> <p>The quantity and type of green space stipulated in the Local Plan’s site allocations has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. The specific detail regarding how that green space is designed and delivered, across the site allocation, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> |
| Reg19-C-005 | Alex | | Reg19-C-005/001a | Green and Water Spaces | | | | | | | No | No | | | | | | Yes | Good to see large areas of green space that are closed to the public next to the North Circular are encouraged to reopen to the public - one with a large gas holder, and one owned by Lady Trower Trust. | | Support noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|--|
| Reg19-C-005 | Alex | | Reg19-C-005/001b | Green and Water Spaces | | | | | | | No | No | | | | | | Yes | <p>However, I don't think all parks and green space in the borough are on the map? Many schools don't have their playfields protected? Cumberland school, Kingsford School, Winsor Primary School, Eastlea Community School etc</p> <p>Why is this the case?</p> <p>Other places where green space is missing from the map?</p> <ul style="list-style-type: none">- along Eisenhower Drive- Public courtyard at Forrester Way- Villers Gardens – green space and playspace- Next to the new UCL building next to the canal- Claypole Road, Leggatt Road, Bisson Road- Playground in Great Eastern Quays (Shackleton Way, Gallions Road)- Grenadier Street, Silverland Street, Manwood Street- Wards Wharf Approach- Royal Wharf Gardens and Corinthian Square- East Ham Town Hall- Abbey Mills Pumping Station- Leather Gardens- Kylemore Close | <p>Add missing green space and parks? They are worthy of protection</p> | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of green space is justified by up to date evidence. Newham's Green and Water Spaces Infrastructure Strategy has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation.</p> <p>Schools and education sites are not included in the strategies publicly accessible green space mapping. The additional spaces listed in your response are considered amenity green space. However, as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p> |
| Reg19-C-052 | GASWOKS DOCK PARTNER SHIP | | Reg19-C-052/001a | Green and Water Spaces | | | | | | | Yes | No | | | | | | Yes | <p>(1) Where the LP in unsound in relation to Green and Water Spaces is that although there are excellent proposals regarding the retention, protection and enhancement of these spaces there is no clear indication of how these will be delivered relating specifically to: habitat and biodiversity monitoring (establishing baselines and ongoing); accountability of developers through continuous assessment and enforcement.</p> | <p>(1) Newham BC needs to appoint a team responsible for the Green and Water Spaces across the borough. This team would need to have the resources, knowledge/skills and powers to monitor and enforce.</p> | <p>Support noted for the policy approach. The Council is seeking to improve our in-house ecology expertise.</p> |
| Reg19-C-052 | GASWOKS DOCK PARTNER SHIP | | Reg19-C-052/001b | Green and Water Spaces | | | | | | | Yes | No | | | | | | Yes | <p>(2) Our experience to date which the LP does not address is a failure to work cooperatively across departments in the council particularly concerning works relating to the public realm, leading to habitat and biodiversity loss by council-led works or contractors working on behalf of the council.</p> | <p>(2) A clear commitment from Newham BC for all departments (and contractors) to sign up to and refer back to the agreed LP relating to Green and Water Spaces. For an obligation for any works that damage habitats to be avoided, but when impossible to avoid for them to be put right.</p> | <p>Comment noted.</p> |
| Reg19-C-052 | GASWOKS DOCK PARTNER SHIP | | Reg19-C-052/001c | Green and Water Spaces | | | | | | | Yes | No | | | | | | Yes | <p>(3) A further deficiency in the LP is not recognising that Newham's major rivers are boundaries with other borough councils and therefore require a different design and management approach to be able to deliver the green/blue corridors described in the LP.</p> | <p>(3) A cross-borough strategy to be created and agreed regarding boundary rivers and green spaces.</p> | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements are justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. Section 7 of the GWIS in particular sets out the improvements needed to deliver green and water space corridors. These spatial green and water space aspirations have been reflected in the Neighbourhood chapter of the Local Plan and its site allocations. The Council is satisfied that the plan is sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-014 | CPRE | | Reg19-E-014/002 | Green and Water Spaces | | | | | | | | | | | | | | | Newham continues to have the least publicly accessible green space of any London borough and the Local Plan needs to be much more ambitious about dealing with this. | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------------------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--|
| Reg19-E-017 | Bonny Downs Community Association | | Reg19-E-017/014 | Green and Water Spaces | | | | | | | | | | | | | | | Flanders Field. Another example of good and vital partnership working is Flanders Field, East Ham. This nine-acre playing field had been left to overgrow until a group of local residents took matters into our own hands and started to cut down the 4ft high grass with petrol trimmers. For the last 25 years this place has been managed by BDCA and more than £2 million has been raised to replace the pavilion, burned down by arsonists, provide a multi-use games area (MUGA) and relay part of the grass playing surface. We have installed the only two grass cricket squares on LB Newham land and developed Newham Cricket Club that after 15 years has just been accepted as a full member of the elite Essex Hamro league. | | Comment noted. |
| Reg19-E-017 | Bonny Downs Community Association | | Reg19-E-017/015 | Green and Water Spaces | | | | | | | | | | | | | | | The maintenance and running costs of Flanders Field are subsidised by income we generate through the Well Community Centre in Vicarage Lane E6 and helped with a contribution of around £25kpa from LBN towards filling the gap between income and expenditure. This small contribution from LBN helps make running Flanders Field viable and provides incredible social value. | | Comment noted. |
| Reg19-E-017 | Bonny Downs Community Association | | Reg19-E-017/016 | Green and Water Spaces | | | | | | | | | | | | | | | We would like to agree a long-term lease in order to secure significant capital funding however this is currently impossible. Although running Flanders Field as a multi-use facility for our whole community is a financial LIABILITY (not a financial asset), we were still asked to pay £11kpa rent, without any commitment from LBN of on-going funding. LBN is liable to replace the current worn-out MUGA surface, and to replace the containerised pavilion in 10-year's time at the end of its life expectancy. | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of playing pitch protection and provision through Policy GWS1.2. This policy approach is justified by up to date evidence, through the Playing Pitch Strategy and through designations on relevant site allocations. This approach is supported by Sport England. The Local Plan cannot deliver the change you have requested. The Council's Leisure Team is best placed to engage with you regarding Flanders Field. Your comment has been passed onto Newham's Leisure team. The Council is satisfied that the plan remains sound without the proposed change. |
| Reg19-E-017 | Bonny Downs Community Association | | Reg19-E-017/017 | Green and Water Spaces | | | | | | | | | | | | | | | Does the council want to continue to work in partnership with the voluntary sector to keep Flanders Field in use as a broad community asset, share on-going revenue costs and work together to secure necessary capital investment? The alternatives would be to scrap the restrictive covenants and sell the land off or choose to let the facility overgrow again. Either way the borough would be deprived of a vital sporting and leisure provision. | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of playing pitch protection and provision through Policy GWS1.2. This policy approach is justified by up to date evidence, through the Playing Pitch Strategy and through designations on relevant site allocations. This approach is supported by Sport England. The Local Plan cannot deliver the change you have requested. The Council's Leisure Team is best placed to engage with you regarding Flanders Field. Your comment has been passed onto Newham's Leisure team. The Council is satisfied that the plan remains sound without the proposed change. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------------------------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| Reg19-E-017 | Bonny Downs Communi ty Associati on | | Reg19-E-017/018 | Green and Water Spaces | | | | | | | | | | | | | | | Cricket Demand for the two grass cricket squares at Flanders Field is massively over-capacity and we desperately need more grass squares in the borough. However they are expensive to maintain and income from local people doesn't cover the maintenance costs. A massive number of volunteer hours (including my own) make maintenance possible and Flanders Field is now renowned as one of the best wickets in the Essex league. | | Comment noted. |
| Reg19-E-017 | Bonny Downs Communi ty Associati on | | Reg19-E-017/019 | Green and Water Spaces | | | | | | | | | | | | | | | It would be wonderful to re-provide cricket squares on development like East Ham Gasworks, alongside income generating facilities like indoor cricket nets. Newham Cricket Club players currently travel to Chingford to use indoor practice facilities. Again a partnership between LBN, the developer and the voluntary sector would spread the costs and multiply the benefits. | | Comment noted. |
| Reg19-E-017 | Bonny Downs Communi ty Associati on | | Reg19-E-017/020 | Green and Water Spaces | | | | | | | | | | | | | | | Newham City FarmNewham City Farm is another example where a LBN/Voluntary sector partnership could reap immediate rewards. The farm previously cost the council huge amounts of money but its closure has created a toxic environment in the community. If this energy was harnessed into positive action, in a way I would be committed to championing, I believe that we could re-open and run the farm without any cost to LBN. In partnership with Oasis Trust, which runs two profitable city farms, we have produced a two-year meanwhile plan that would explore whether this long-term dream is achievable. LBN's contribution would be a peppercorn rent. At Eko Pathways SEMH School, E6 we currently send pupils to Oasis' Waterloo City Farm for therapeutic education sessions. Local businesses including UEL and Buhler are also interested in supporting this project. This sort of partnership could be lauded by LBN as a great positive partnership initiative. | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of activating and improving the functionality of green spaces through Policy GWS1. This policy approach is justified by up to date evidence, through the Green and Water Infrastructure Strategy and through green space designations on relevant site allocations. The Local Plan cannot deliver the change you have requested. The Council's Parks Team is best placed to engage with you regarding Newham City Farm. Your comment has been passed onto Newham's Parks team. The Council is satisfied that the plan remains sound without the proposed change. |
| Reg19-E-025 | Daniel Zimarev | | Reg19-E-025/001 | Green and Water Spaces | | | | | | | Blan k | Blan k | | | | | | Blan k | Excellent outreach to the inhabitants. Here are my thoughts on what will make the plan better. <u>Positives:</u> > Green space has been made more purposeful; around path to bridge only. | | Comment noted. |

| | | | | | | | | | | | | | | | | | | | |
|-------------|----------------------------------|--|-----------------|---------|--|--|--|--|--|--|-------|-------|--|--|--|--|-------|--|----------------|
| Reg19-E-061 | Royal Docks Management Authority | | Reg19-E-061/001 | General | | | | | | | Blank | Blank | | | | | Blank | <div><div>RoDMA Comments on the Newham Reg 19 Local Plan</div><div><div>1. London’s Royal Docks are an extremely special body of water. They are central to Newham and wholly contained within the Borough. Other water bodies are passing visitors, the Royals are a permanent resident. When completed they were the biggest artificially enclosed docks in the World. Due to their 5km East-West orientation they are one of the few places in London you can see both a sunrise and a sunset.</div><div>2. They comprise three main Docks and two attached body of waters which have very different characteristics:<ul style="list-style-type: none">• Royal Victoria Dock – is already a visitor destination in it’s own right, a focus for in-water activities, water sports, wellness including the beach in summer and floating vessels comprising food and beverage and hotel uses.• Royal Albert Dock – a focus for water sports. One of the two non-tidal 2km rowing courses in the south of England. The other one is privately owned and increasingly difficult to access.• King George V Dock – surrounded by LCY Runway and airport land it is the current operational industrial legacy of the former Port. It stores vessels, barges and ships.• Pontoon Dock – part of the Silvertown Development, its potential use yet to be determined.• Royal Albert Basin – the site of the former Gallion’s Marina with a craft lock out onto the River Thames. Constrained by the Sir Steve Redgrave Bridge with limited access into Royal Albert Dock. A new marina is part of the planning application for the Albert Island Development.• Pontoon Dock – part of the Silvertown Development, there are evolving plans for its use following the development.</div><div>3. There are areas in the Royal Docks which are a blank canvas for water activation and yet these canvasses will remain blank under the current Local Plan. It fails to understand the inherent flexibility of positioning things on water. This is very different from developing on land, in three distinct ways:<div><div>(a) physically, uses on water need to float and be anchored;</div><div>(b) nautical circumstances and exposure make for additional requirements on maintenance and durability; and therefore are usually more expensive than building on land;</div><div>(c) the inherent nature of a floating object, is that it can always be moved.</div></div><div>This movable nature of uses of water means the ‘canvas’ can therefore be turned blank once again if it is decided that is what is required. This is not so easy on the land. It is important that the Local Plan recognises this inherently flexible and evolving nature of a dock, by providing a policy framework within which proposals can come forwards and be assessed.</div></div></div></div> | Comment noted. |
|-------------|----------------------------------|--|-----------------|---------|--|--|--|--|--|--|-------|-------|--|--|--|--|-------|--|----------------|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| | | | | | | | | | | | | | | | | | | | 4. Royal Victoria Dock (RVD) could be a focus for wellness, physical, emotional and mental health through water activation activities. Wake up Docklands and NOWCA currently located in RVD have start up programmes in this area and could do with more support. As human beings we comprise at least 60% water and are drawn to water in a way that provides an unconscious emotional comfort. Getting close to the water is the key and providing ways for pedestrians to be in closer proximity to the water via floating walkways/pontoons/gardens rather than the dock edge is the key (the dock edge this is usually 1.4m above the water). | | |
| Reg19-E-156 | John Saunders | | Reg19-E-156/001 | Green and Water Spaces | | | | | | | Blank | Blank | | | | | | Blank | <u>Green and water spaces, and the visual environment.</u> Include reference to the positive mental effects of an attractive visual environment. Add the importance of avoiding a negative visual aspects [for example:- graffiti, especially on housing properties, intrusive signs and advertisements, and unnecessary glare from street and industrial lighting]. Wherever possible the developer and owner should be responsible for the long term maintenance and servicing of green spaces, water designs etc., or if they cannot they should make a fully costed financial capital payment. | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Green and Water Spaces chapter already underlines the importance of green and water infrastructure to people’s health and wellbeing. Paragraph 3.200 sets out that ‘this infrastructure provides a significant range of benefits (often described as ‘ecosystem services’), enhancing the health and wellbeing of people living in the borough, 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. Newham’s Just Transition Plan (2023) and the borough’s health and wellbeing strategy, Well Newham, 50 Steps to a Healthier Borough (2024) recognise the important role open spaces play in helping address the climate emergency and improving our health and wellbeing’. Clause 5 of Policy GWS1 sets out that it is expected that 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.</p> <p>Policy GWS1 addresses the need to protect and deliver more green space. The findings of the Green and Water Infrastructure Strategy have been used to inform the site allocation and specific needs for green space, growing space and play space have been set out in their infrastructure requirements. The Council is satisfied that the plan is sound without the proposed changes.</p> |
| Reg19-E-166 | Natural England | | Reg19-E-166/004 | Green and Water Spaces | | | | | | | | | | | | | | | We also note that all development that has the potential to lead to adverse impacts on the SAC is required under the Habitats Regulations to provide a Habitats Regulations Assessment, including to Appropriate Assessment stage where mitigation is being provided. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|---|
| Reg19-E-166 | Natural England | | Reg19-E-166/005 | Green and Water Spaces | | | | | | | | | | | | | | | <u>Habitats Regulations Assessment</u> Natural England note that a draft Habitats Regulations Assessment (HRA) has been prepared by WSP for Regulation 19 of the Newham Local Plan. Natural England do not currently agree with the conclusions presented in paragraph 6.2.2 of the HRA for the reasons outlined below. However, we note that the HRA will continue to be reviewed and updated and Natural England will continue to work proactively with the council to address these concerns. | | Comment noted. This comment has been subject to further discussion with Natural England and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. |
| Reg19-E-166 | Natural England | | Reg19-E-166/006 | Green and Water Spaces | | | | | | | | | | | | | | | <u>Recreational Disturbance – Epping Forest SAC</u> Natural England welcome the positive approach to Epping Forest SAC mitigation that the council have had since the issues were identified in visitor surveys in 2017 and 2019. The Strategic Access Management and Monitoring (SAMM) Governance Agreement that has been adopted by Cabinet is a welcome first step in managing the impact of visitor numbers on Epping Forest SAC. | | Support noted. |
| Reg19-E-166 | Natural England | | Reg19-E-166/007 | Green and Water Spaces | | | | | | | | | | | | | | | We note that point 5.2.8 in the HRA refers to the provision of Suitable Alternative Natural Greenspace (SANG) but appears unfinished. | | Typo is noted. An update will be made to the IIA. |
| Reg19-E-166 | Natural England | | Reg19-E-166/008 | Green and Water Spaces | | | | | | | | | | | | | | | Our position remains that all development leading to a net increase in residential units within 6.2km of Epping Forest SAC should provide contributions to both SAMM and SANG and therefore at this stage we do not agree with the conclusion in paragraph 5.2.10. However, we note that policy GSW3 refers to the provision of both SAMM and SANG for new development which is in line with our position. | SoCG: This topic is still subject to discussion as per other items on this email. | Comment noted. This comment has been subject to further discussion with Natural England and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. |
| Reg19-E-166 | Natural England | | Reg19-E-166/009 | Green and Water Spaces | | | | | | | | | | | | | | | We have had initial conversations with the council about approaches to SANG and possible locations for greenspace improvements in the borough (outside of those which are proposed elsewhere in the plan) and look forward to continuing these over the coming months. We will continue to support the council to develop a suitable SANG strategy that identifies proportionate mitigation options for new residential development coming forward within the 6.2km Zone of Influence in Newham. | | Support noted. This comment has been subject to further discussion with Natural England and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| Reg19-E-166 | Natural England | | Reg19-E-166/010 | Green and Water Spaces | | | | | | | | | | | | | | | <u>Air Quality – Epping Forest SAC</u> Natural England appreciate the work by Newham Council in modelling the potential air quality impacts of the plan on Epping Forest SAC, and we note the ongoing challenges of this work. Currently we are not able to agree with the conclusion that there will be no adverse effect on integrity of Epping Forest SAC as a result of air quality (paragraph 5.5.1). We look forward to continuing conversations with the council over these issues and would welcome the opportunity to discuss the modelling and results further as updates are made. | | Comment noted. This comment has been subject to further discussion with Natural England and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. |
| Reg19-E-166 | Natural England | | Reg19-E-166/011 | Green and Water Spaces | | | | | | | | | | | | | | | <u>Other Matters</u> Further general advice is provided in Annex 1. [Annex 1 attached - Natural England's Local Plan Advice] | | Comment noted. |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/007 | Green and Water Spaces | | | | | | | | | | | | | | | In consideration of the relevant tests set out at Paragraph 35 of the NPPF, we raise concerns, as set out below, relating to the Draft Policy GWS1 (Green Spaces) and The Green and Water Infrastructure Strategy 2024 (“G&W Strategy 2024”), which was used to inform Draft Policy GWS1. | | Comment noted. |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/008 | Green and Water Spaces | | | | | | | | | | | | | | | ‘GREEN SPACE’ DESIGNATION Under the Reg 19 Draft Newham Local Plan, the Site is designated as ‘green space’. This is a change from the previous Reg 18 Draft Newham Local Plan version in which the site was undesignated. Under Draft Policy GWS1 (Green Spaces) of the Draft Newham Local Plan, green space “is defined as space in either public or private ownership, which can have unrestricted access, partially-restricted access or restricted access. This includes all vegetated open space of public value (whether publicly or privately owned), including...growing space (including allotments and community gardens)”. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/009 | Green and Water Spaces | | | | | | | | | | | | | | | We understand that the Council’s rationale for designating the Site as ‘green space’ is on the basis that the Site’s last lawful use was a plant nursery and so the Council consider the Site to be appropriate as a ‘community growing space’ (including allotments and community gardens), which falls within the definition of ‘green space’ under Draft Policy GWS1. This is demonstrated by the Council’s response to the City of London’s Reg 18 written representations, which states that <u>[our emphasis]: “The West Ham Park 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”</u> ... “We consider that this change was necessary to reflect the findings of the Green and Water Infrastructure Strategy (2024) which has identified a shortfall of community growing space in Newham.” | | Comment noted. |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/010 | Green and Water Spaces | | | | | | | | | | | | | | | In response to this designation, it should be made clear that whilst the Site is in private ownership and is restricted in its access, it does not provide ‘vegetated open space of public value’. The majority of the Site comprises derelict glasshouses and is considered to be brownfield, previously developed land. It is vacant and derelict and detracts from the wider RPG designation of West Ham Park. We do not consider that the Site accords with the definition of green space as set out in Draft Policy GWS1. | | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/011 | Green and Water Spaces | | | | | | | | | | | | | | | Moreover, the suggestion that the Site should be designated as a ‘community growing space’ (including allotments and community gardens) as a result of its last lawful use is misleading and inaccurate. 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. | | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/012 | Green and Water Spaces | | | | | | | | | | | | | | | We note that as part of the G&W Strategy 2024 which has informed Draft Policy GWS1, the Site is identified as an existing ‘allotment’ (see Figure 5.2 of the G&W Strategy 2024 entitled ‘Allotments’). In planning terms, the concept of an allotment or community garden is raised in the London Plan (March 2021) under Policy G8 (Food Growing) and the All London Green Grid SPG (March 2012) in the context of promoting sustainable food production. Whilst no universally accepted definitions exist, the Section 22(1) Allotments Act 1922 defines ‘allotment garden’ to mean “an allotment not exceeding forty poles in extent which is wholly or mainly cultivated by the occupier for the production of vegetable or fruit crops for consumption by himself or his family”. Section 1, Allotments Act 1925 states “an allotment garden as defined in the 1922 Act, or any parcel of land, whether attached to a cottage or not, of not more than two acres in extent, held by a tenant under a landlord and cultivated as a garden or farm, or partly as a garden and partly as a farm”. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|---|--|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/013 | Green and Water Spaces | | | | | | | | | | | | | | | Thus, taking these definitions and a layperson’s understanding of what an allotment or community garden constitutes, we consider that these are typically spaces used in relation to food production and not as space operated for a business or civic function (such as market gardens, or plant nurseries). In light of this, we consider that the Council’s labelling of this Site as a “community growing space’ (including allotments and community gardens), falling within a wider ‘green space’ designation, is inaccurate and unjustified. This is on the basis that its last lawful use was as a plant nursery (to grow plants for the sole use of the City of London). | To remedy this, we recommend reference to ‘community growing space’ space’ (including allotments and community gardens) should be defined and clearly align with relevant legislation and the London Plan (March 2021) with emphasis on promoting food production. This is turn would require the Site’s proposed designation as such to be removed, given that it bears no relation to its last known use, as described above. | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/014 | Green and Water Spaces | | | | | | | | | | | | | | | METHODOLOGY FOR DESIGNATION In a similar vein, we also raise concern with the lack of a robust methodology to inform the designation of the Site as a ‘green space’ and specifically its sub-designation as ‘community growing space’. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/015 | Green and Water Spaces | | | | | | | | | | | | | | | The G&W Strategy 2024, acknowledges that in producing a methodology for ‘community growing spaces’ “there is no best practice standard for allotments and growing spaces and the survey of quality for these spaces was not carried out.” We argue that the designation of the Site as ‘community growing space’ is unjustified as there appears to be no set parameters (i.e methodology) which the authors of the G&W Strategy 2024 have been working to, in producing this document and sub-designating spaces | | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, thereby removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/016 | Green and Water Spaces | | | | | | | | | | | | | | | Moreover, it is noted that the authors of the G&W Strategy 2024 did not carry out a ‘survey of quality for these spaces’. We have concerns therefore that the sub-designation of the Site (and subsequent designation of the Site as ‘green space’) has been based purely on desktop review, without consideration or understanding of the Site’s context or history. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/017 | Green and Water Spaces | | | | | | | | | | | | | | | Indeed, and as noted above, the fact that the Site was identified as an existing ‘allotment’ within the G&W Strategy 2024, despite sharing no characteristics with an allotment use, is concerning and factually inaccurate. In addition to Figure 5.2 of the G&W Strategy 2024, this inaccuracy is demonstrated by Figure 5.6 ‘Allotment and growing space deficiency – all Wards’ of G&W Strategy 2024 which the shows the Site as an ‘allotment’ together with a 0.5km buffer surrounding it, to demonstrate accessibility to the Site. Accompanying paragraph 5.26 states “Newham has 15 permanent allotment and growing area spaces with a total area of 17.88 Ha”. However, since CoL acquired the Site, it has not been open to the public, ceased operation as a plant nursery in 2016 and is now disused. In this respect, the Site should not be regarded as ‘accessible’ nor a ‘permanent allotment’ within the G&W Strategy 2024. We consider that the evidence as presented is misleading | | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, thereby removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/018 | Green and Water Spaces | | | | | | | | | | | | | | | OPEN SPACE DATA – ALLOTMENTS REVIEW We note that Appendix II (Open Space Data) of both strategy documents (G&W Strategy 2022 and G&W Strategy 2024) categorises the number of green and water spaces based on location (Growth Ward Boundary), size (hectares) and accessibility (freely / not freely). This includes the number of allotments in the borough, however, does not define the sites in question. We understand that the Open Space Data informed the basis of both strategy documents. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--------------------|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/019 | Green and Water Spaces | | | | | | | | | | | | | | | <p>From reviewing this Open Space Data, we cannot find any reference to the Site.Under the Reg 18 Draft Newham Local Plan, the Site was located within the Forest Gate Ward. There were no allotments in the Forest Gate Ward identified in the G&W Strategy 2022 and G&W Strategy 2024. Under the Reg 19 Draft Newham Local Plan, the Site now forms part of the West Ham Ward. The West Ham Ward in the G&W Strategy 2022 and G&W Strategy 2024 shows one allotment spanning 0.20 hectares. This allotment, spanning 0.20 hectares, is understood to be Abbey Gardens. Figure 5.2 ‘Allotments’ of the G&WS 2024 then identifies the Site as an existing ‘allotment’, despite the Site not being identified within the Open Space Data. On that basis, we consider that there is a discrepancy between the Open Space Data collected and published at Appendix II and the information which then forms the baseline of the G&WS 2024, in which the Site is identified as an existing ‘allotment’.Ensuring a robust baseline is fundamental to ensuring that the evidence supporting Policy GWS1 and relevant ‘green space’ designations within the Draft Newham Local Plan is correct. This appears to not be the case in relation to the Site.</p> | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|----------------|---------------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/032 | Green and Water Spaces | | | | | | | | | | | | | | | Fundamentally, we do not consider that the Site accords with the definition of green space as set out in Draft Policy GWS1. Moreover, the suggestion that the Site should be designated as a ‘community growing space’ (including allotments and community gardens) as a result of its last lawful use is misleading and inaccurate. | | <p>The Council’s objective for this policy approach is to help to deliver easy access to a network of high-quality green spaces.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration, thereby removing the community growing space designation:</p> <p>Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Polices Map Correct MOL designation at proposed West Ham Park MOL parcel (A33) on Key Diagram</p> <p>We are amending the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we consider that this wider parcel meets the definition of MOL in the London Plan. Therefore, the whole of the West Ham Nursery site will be included into the proposed West Ham Park MOL parcel (A33). This will be published in an updated Metropolitan Land Review (2025). In accordance with London Plan Policy G3 Metropolitan Open Land, we have consulted the Mayor and adjoining boroughs on this update to Newham’s Metropolitan Review.</p> <p>We have amended the Green and Water Infrastructure Strategy to reflect this update, this is included in the revised 2025 version of the Strategy.</p> |
| Reg19-E-177 | City of London | Montagu Evans | Reg19-E-177/033 | Green and Water Spaces | | | | | | | | | | | | | | | In addition, we consider that the evidence base (G&W Strategy 2024) which has informed the designation of the Site as ‘green space’ within the Draft Newham Local Plan is not sufficiently robust. No clear definition or methodology has been used when designating the Site as a ‘green space’ or in identifying the Site as an existing ‘allotment’. All ‘growing’ that took place at the Site was more akin to a commercial function (albeit undertaken as part for Col’s civic function and duties) and was not growing of the sort that could be referred to as allotments and / or community gardens. | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|--|
| Reg19-E-178 | Royal Docks | | Reg19-E-178/040 | Green and Water Spaces | | | | | | | Blank | Blank | | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: (Royal Victoria Dock) The detail in the evidence base document (Green and Water Infrastructure Strategy 2024) should be elevated to the main Plan document itself. Specifically, the information in section 7.38 which explains the potential for residential and economically productive initiatives.</p> | | A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is justified by up to date evidence base. The Green and Water Infrastructure Strategy has informed the policy approach to green, water, play and community growing spaces in the Local Plan. This evidence base is particularly reflected in the Green and Water Spaces chapter and the policies in the Neighbourhood chapter and the infrastructure requirements in the site allocations. The Council is satisfied that the plan is sound without the proposed changes. |

| | | | | | | | | | | | | | | | | | | | | |
|-------------|-------------|--|-----------------|------------------------|--|--|--|--|--|--|-------|-------|--|--|--|--|--|-------|--|---|
| Reg19-E-178 | Royal Docks | | Reg19-E-178/041 | Green and Water Spaces | | | | | | | Blank | Blank | | | | | | Blank | <p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work.</p> <p>In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: (Royal Albert Dock) Specific reference should be made to the Royal Albert Dock Trust facility on Royal Albert Dock and the options to increase the scale of provision by improving the building on the dock edge.</p> | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>The Neighbourhoods chapter of the Local Plan does not set out the names of community organisations, such as the Royal Albert Dock Trust, operating in the area. This is considered to be too fine a level of detail and one which could be subject to future change. The N3 Royal Albert North neighbourhood profile already highlights the London Regatta Centre, from which the Royal Albert Dock Trust operate.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and</p> |
|-------------|-------------|--|-----------------|------------------------|--|--|--|--|--|--|-------|-------|--|--|--|--|--|-------|--|---|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|---------------------------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--|
| | | | | | | | | | | | | | | | | | | | | | scaled waterfront amenities and activation for water-related or water-dependant facilities; |
| Reg19-E-190 | Manor Park Business Association | | Reg19-E-190/003 | Green and Water Spaces | | | | | | | | | | | | | | | We note that there is a lack of flowers and trees along the Romford Road, East and West and it looks very dry and non-appealing. Its used very widely and is very busy, so some trees and flowers would be welcome. | | Comment noted. |
| Reg19-E-195 | St William Homes LLP | Quod | Reg19-E-195/058 | Green and Water Spaces | | | | | | | | | | | | | | | 9 Green and water spaces 9.1 St William continues to support the principle of the Local Plan’s approach to green and water spaces in the borough, recognising the importance of these spaces in providing a significant range of benefits including enhancing the health and wellbeing of people living in the borough, supporting LBNs 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. | [Appendix 12: General Policies – Suggested amendments] | Support noted. |
| Reg19-E-200 | London City Airport | | Reg19-E-200/048 | Green and Water Spaces | | | | | | | | | | | | | | | Annex 2 LB Newham Draft Local Plan – Regulation 19 Review LCY KEY PLAN COMMENTS As per comments in main submission body, LCY areas designated as “Green Space” outlined in red, and area requiring revised shoreline validation outlined in blue. [Image] Extract from the “LBN Reg 19 Policies Map”, demonstrating a similar overlay issue [Image] | | Comment noted. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and the error on the Key Diagram and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, which will be presented to the Inspector for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025 and Newham's Sites of Importance for Nature Conservation Review (2025). |

| | | | | | | | | | | | | | | | | | | | |
|-------------|------------|--|-----------------|------------------------|--|--|--|--|--|--|-------|----|--|--|--|--|-------|---|--|
| Reg19-E-214 | Good Hotel | | Reg19-E-214/003 | Green and Water Spaces | | | | | | | Blank | No | | | | | Blank | <p>The specific and historic nature of a large body of water such as the Royal Docks It is generally recognised that a large body of water within the urban area of Greater London has untapped potential for placemaking and water activation. It is somehow less recognised, it seems, that such a unique and large body of water needs a unique approach to be activated.</p> <p>Quite simply put: the Royal Docks are not of a size and scale that is especially easy to enjoy on a humanly pleasant level. They are too large, and all too often devoid of activity. Big bodies of water, which were historically dug like that for good reasons, now have lost their original use, and tend to have become inaccessible (except for open water swimmers and wake boarders) and are prone to be very windy and generally difficult to enjoy for leisure uses, unless that scale can be brought down to a smaller, more human scale.</p> <p>Clearly, the Eastern parts of the Royal Docks, close to LCY, are less suited for smaller scale visitor enjoyment, as these are right next to City Airport. In areas like these, one could readily visualise innovative uses such as a floating solar farm, and otherwise it is sensible to keep them relatively free and open.</p> <p>That is not to say the whole 5km stretch of the Royal Docks should be treated in that exact same way. The Royal Victoria Dock, and especially the part from ExCeL / Silvertown to the west, is currently already the most accessible and best used part of the Royal Docks. Key stakeholders such as RoDMA, GLA, ExCeL, Sunborn and ourselves have made efforts to introduce uses which help to break down to vast expanse of the water in some places so as to make them more accessible and enjoyable at a human scale. This is what works well with waterways in places like Amsterdam and Venice where the water ways are much narrower and therefore pleasant to enjoy.</p> <p>The docks were not built to be empty unused wide bodies of open water. They were dug to facilitate the huge trade that was generated by Imperial Commerce. Historically the water and its edges would have been exceptionally busy with ships and commercial activity thronging the water and the land. Such constantly evolving activity would have brought a human scale to the Docks which is absent now that activity has dissipated. In our view it is the role of the Local Plan to encourage innovative uses of the water and the water's edge so as to reinvigorate the Docks and once more integrate it into the urban environment.</p> <p>The adopted plan rightly highlights that this does not mean merely extending the land, but rather we suggest that the plan ought to be far more positive so as to encourage innovative and active uses which bridge activities on the water and the land. This might be a range of innovative activities from floating flower markets in Amsterdam to floating saunas</p> | <p>The Council's objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy GWS2:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and</p> <p>b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy (2024); including the requirements in the neighbourhood policies and site allocations; and</p> <p>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</p> <p>de. requiring no encroachment loss or covering of any water space unless it is a water-related or water dependent use. Development proposals to impound or narrow water spaces will not be supported; and</p> <p>ed. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and</p> <p>fe. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and</p> <p>gf. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and</p> <p>hg. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and</p> <p>ih. contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and</p> <p>ji. improving the safety and public use of the borough's water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.</p> <p>The following wording change, to implementation</p> |
|-------------|------------|--|-----------------|------------------------|--|--|--|--|--|--|-------|----|--|--|--|--|-------|---|--|

| | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---|--|---|
| | | | | | | | | | | | | | | | | | <p>in Stockholm. The plan needs to be positive to encourage such uses and innovation and not preclusive unless overly rigorous and restrictive criteria are surmounted.</p> <p>Planning to use century old docks for 21st century urban life requires imagination and positivity – not an old-fashioned restrictive policy, setting unrealistic hoops.</p> <p>That is to say: we need certain actions and decisions in the Royal Docks that might appear contrary or paradoxical, when compared to what for example the Regent Canal might call for. But they are very much needed, because water activation does not happen out of itself, and floating things cannot be moored on "sky anchors". We need to make it economically possible to activate the water, and we need the Local Plan to allow for this.</p> <p>Following the commercial end of the docks activity largely ceased on the water and on the adjoining land. This intermezzo between the 1980s and 2010s when not much happened in the Royal Docks and they become open, windswept and unused has in reality been the anomaly. Not the other way around. Since around 2010, when ExCeL started playing such an active role in the area, the western part of RVD has become a visitor destination, thanks to the factors such as the cable car, two floating hotels and the wakeboarding centre, and more recently, the Elizabeth Line and City Hall moving in.</p> <p>In order to further increase the attractiveness and accessibility of the Dock to the whole community, next steps are now needed to help develop the potential of the Royal Docks. These historic dock should not only be preserved (in their empty state since the hustle bustle ended) but rather deserve to be actively used, enhanced and celebrated, with their distinct nautical heritage playing a key role in helping the local community to thrive.</p> <p>In that light, the planning process for the mooring of the current hotel vessel has laid bare some significant challenges. Whilst planning applications should be judged through a comprehensive planning framework that aligns national policy with local needs, there seems to be a recent trend where policy is being interpreted to promote the ‘status quo’ in the Docks, to discourage further placemaking on and activation of the water, to keep the Docks empty and protect the artificial ‘openness’ that has arisen from the decades of the decline and stagnation of the docks. And the language that is currently being proposed for the new Reg 19 Local Plan directly causes a situation within which it is made extremely difficult and unpredictable for the business to invest resources into the docks.</p> <p>This is not what a positively prepared plan looks like.</p> | | <p>point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>Less-Encroachment</p> <ul style="list-style-type: none">• Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in the encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft. <p>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. and demonstrate that it will not compromise the suitability of the water space for water-related uses.</p> <p>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</p> <p>The Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities; AND</p> |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---|--|---|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| | | | | | | | | | | | | | | | | | | | We would love to see LBN envisioning a future focused Local Plan which can be a positive tool for the Royal Docks achieving some of the same recognition and status as other notable cities on waterways, who’s identity has been redefined and regenerated through activating the water. We refer to Copenhagen, which has brought life to its riverbanks through all sorts of floating boardwalks, lidos and other leisure uses. It is noted that significant investment from the city was made in this area. We also refer to the North side of Amsterdam as well as its IJburg district, where floating houses and leisure uses (including hotels) were introduced to enhance the accessibility and friendliness of otherwise large bodies of water. Further examples can be found in Hamburg and Rotterdam, and closer to home, at the Liverpool Waters. | | <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |

| | | | | | | | | | | | | | | | | | | | |
|-------------|------------|--|-----------------|---------|--|--|--|--|--|--|-------|----|--|--|--|--|-------|---|--|
| Reg19-E-214 | Good Hotel | | Reg19-E-214/004 | General | | | | | | | Blank | No | | | | | Blank | <p>London Plan SI16 & SI17</p> <p>Interestingly, the Reg 19 Local Plan seems to seek alignment with the London Plan, more specifically with Policy SI16 and SI17 of the London Plan. However, the way the Reg 19 Local Plan seems to construe the wording and the intention of those policies in the London Plan, is plainly in error.</p> <p>When one refers to the language in the Annex and one can only conclude that the text of SI16 and SI17 makes it clear that the London Plan seeks to find a careful balance between:</p> <ul style="list-style-type: none">• Activating the water, and increasing public access and enjoyment of the water;• While balancing that with other uses, such as navigation;• While underscoring some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity, etc.); yet at the same time;• Also underscoring the separate and very different characters that different bodies of water have -- i.e. a large river (e.g. the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock. <p>To read a "one-size-fits-all" approach to different types of waterbodies in different locations throughout London into the wording of SI16 and SI17 of the London Plan is not appropriate, and to persist in this approach renders the plan obviously unsound.</p> | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy GWS2:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement; and</p> <p>b. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of existing water space, with a particular focus on the locations set out in the Green and Water Infrastructure Strategy (2024); including the requirements in the neighbourhood policies and site allocations; and</p> <p>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</p> <p>ed. requiring no encroachment loss or covering of any water space unless it is a water-related or water dependent use. Development proposals to impound or narrow water spaces will not be supported; and</p> <p>ed. ensuring no harm to the openness of the water space and securing a design which is sensitive to the wider landscape setting; and</p> <p>fe. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain (see Local Plan Policy GSW3); and</p> <p>gf. protecting and where possible improving access points to and along water spaces, delivering waterside walkways and cycle paths where appropriate; and</p> <p>hg. providing suitable setbacks from water space edges to mitigate flood risk and to allow waterside walkways and cycle paths where appropriate; and</p> <p>ih. contributing to the improvement of flood defences and river walls where necessary, while providing associated landscape, amenity and habitat improvements (see Local Plan Policies CE7 and CE8); and</p> <p>ji. improving the safety and public use of the borough’s water spaces by providing active frontages to improve surveillance and riparian lifesaving equipment, where appropriate.</p> <p>The following wording change, to implementation</p> |
|-------------|------------|--|-----------------|---------|--|--|--|--|--|--|-------|----|--|--|--|--|-------|---|--|

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---------------------|--|--|
| | | | | | | | | | | | | | | | | | | | | | <p>point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>Loss-Encroachment</p> <ul style="list-style-type: none">• Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in the encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft. <p>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible. and demonstrate that it will not compromise the suitability of the water space for water related uses.</p> <p>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period.</p> <p>Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</p> |

Green and Water Spaces Comments to the [full Regulation 19 Representations](#)

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|-------------------------------|--------------|-----------------|------------------------|--|--|--|--|--|--|-------|-------|--|--|--|--|--|-------|---|--|---|
| Reg19-E-214 | Good Hotel | | Reg19-E-214/005 | General | | | | | | | Blank | No | | | | | | Blank | <p>Conclusion</p> <p>It should be the goal of the Reg 19 Local Plan to promote a bespoke positive policy for Royal Victoria Dock, which encourages innovation and activation to restore life and activity to the Docks whilst protecting and enhancing the very particular and historically special character of the waters in the Royal Victoria Dock. In that light, it is clear that the Reg 19 Local Plan wording as currently proposed is not in line with the (intention and) wording of the London Plan.</p> <p>We have seen the comments on the Local Plan submitted by the GLA and are in full agreement with them, in particular the recognition of the different and unique characteristics of the docks compared to other water bodies and the suggestion for policy wording promoting the unique role of Royal Victoria Dock and the opportunity for waterrelated activation and uses.</p> | <p>We request that LBN update the draft Local Plan to specifically include the draft policy wording recommended by the GLA.</p> | <p>The Council’s objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and has therefore drafted the following modifications, which will be presented to the Inspector for their consideration:</p> <p>N1: North Woolwich</p> <p>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N3: Royal Albert North</p> <p>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> |
| Reg19-E-240 | West Ham United Football Club | PMV Planning | Reg19-E-240/005 | Green and Water Spaces | | | | | | | Blank | Blank | | | | | | Blank | <p>Metropolitan Open Land</p> <p>The draft Policies Map has also been updated to show the area directly to the north and east of the stadium as Metropolitan Open Land (MOL), including the northern concourse area which is previously developed land. MOL is given the same status as Green Belt in London.</p> | <p>The draft policies map should be updated to remove the previously developed land around the London Stadium from the MOL Area 32 designation.</p> | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as this is a site designated as MOL in the LLDC's adopted Local Plan (2021). The designation is further justified by up to date evidence base, through Newham's Metropolitan Open Land</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|---------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|---|
| | | | | | | | | | | | | | | | | | | | <p>The MOL encompassing the land around the London Stadium is known as MOL Area 32 within the Newham MOL Review (2024). The images below show an aerial image of the London Stadium alongside an excerpt of the draft Policies Map MOL designation. The green hatching on the policies map shows the extent of the MOL around the stadium and when compared to the aerial imagery it is clear that the current MOL boundary includes some amount of previously developed land. (See site map on page 4)</p> <p>Considering the current consultation on an updated National Planning Policy Framework (NPPF) which proposes to introduce a grey belt category of Green Belt it is reasonable to think that grey belt will become relevant to MOL in London by the time the Newham Local Plan is adopted. Grey belt is proposed to be: “land in the green belt comprising previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes”.</p> <p>Grey belt land which makes a limited contribution to the five Green Belt purposes would be land that (NPPF Consultation, 2024):</p> <p>a) Does not strongly perform against any Green Belt purpose; and</p> <p>b) Have at least one of the following features:</p> <p>a. Land containing substantial built development, or which is fully enclosed by built form.</p> <p>b. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another.</p> <p>c. Land which is dominated by urban land uses, including physical developments</p> <p>d. Land which contributes little to preserving the setting and special character of historic towns.</p> <p>This means that after brownfield sites have been considered, grey belt will be turned to next to consider its development potential. With that in mind, there is an opportunity as part of the ongoing Local Plan process for the council to review it’s MOL boundaries and where land may be grey belt, remove it from the MOL designation.</p> <p>Under the forthcoming NPPF changes, the developed land around the London Stadium would meet the proposed criteria to be considered grey belt as it contains substantial built development already and in our view, it does not perform strongly against any five of the Green Belt purposes.</p> | | Review. The Council is satisfied that the plan is sound without the proposed changes. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|--|--|--------------------|
| Reg19-E-244 | One Newham | | Reg19-E-244/037 | Green and Water Spaces | | | | | | | | | | | | | | | <p>Green & Water spaces</p> <p>Flanders Field.</p> <p>Another example of good and vital partnership working is Flanders Field, East Ham.</p> <p>This nine-acre playing field had been left to overgrow until a group of local residents took matters into our own hands and started to cut down the 4ft high grass with petrol strimmers.</p> <p>For the last 25 years this place has been managed by BDCA and more than £2 million has been raised to replace the pavilion, burned down by arsonists, provide a multi-use games area (MUGA) and relay part of the grass playing surface.</p> <p>We have installed the only two grass cricket squares on LB Newham land and developed Newham Cricket Club that after 15 years has just been accepted as a full member of the elite Essex Hamro league.</p> <p>The maintenance and running costs of Flanders Field are subsidised by income we generate through the Well Community Centre in Vicarage Lane E6 and helped with a contribution of around £25kpa from LBN towards filling the gap between income and expenditure. This small contribution from LBN helps make running Flanders Field viable and provides incredible social value.</p> <p>We would like to agree a long-term lease in order to secure significant capital funding however this is currently impossible. Although running Flanders Field as a multi-use facility for our whole community is a financial LIABILITY (not a financial asset), we were still asked to pay £11kpa rent, without any commitment from LBN of on-going funding.</p> <p>LBN is liable to replace the current worn-out MUGA surface, and to replace the containerised pavilion in 10-year’s time at the end of its life expectancy. Does the council want to continue to work in partnership with the voluntary sector to keep Flanders Field in use as a broad community asset, share on-going revenue costs and work together to secure necessary capital investment? The alternatives would be to scrap the restrictive covenants and sell the land off or choose to let the facility overgrow again. Either way the borough would be deprived of a vital sporting and leisure provision.</p> | | Comment noted. |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-244 | One Newham | | Reg19-E-244/045 | Green and Water Spaces | | | | | | | | | | | | | | | <p>Green, water, play and community growing spaces Green and Water Spaces chapter The statistics in this chapter, relating to the amount of green, water, play and community growing spaces we have currently and the targets we set over the Local Plan period, have been refined.</p> <p>Community members feel the plan does not Really not address the inequities, only fancy luxury buildings and nothing for the existing sites and spaces,</p> | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-244 | One Newham | | Reg19-E-244/046 | Green and Water Spaces | | | | | | | | | | | | | | | [Community members feel the plan does not Really not address the inequities, only fancy luxury buildings and nothing for the existing sites and spaces,] no interest in pocket parks. | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |

| Representation Reference | Representor | Agent | Comment Reference | Chapter | Policy | Site allocation | Introduction | Clause | Justification | Implementation text | Legally Compliant? | Sound? | Positively prepared? | Justified? | Effective? | Consistent with the NPPF? | Consistent with the London Plan? | Complies with Duty to Cooperate? | Representor Comment | Proposed modifications and explanation | LB Newham Response |
|--------------------------|-------------|-------|-------------------|------------------------|--------|-----------------|--------------|--------|---------------|---------------------|--------------------|--------|----------------------|------------|------------|---------------------------|----------------------------------|----------------------------------|---|--|---|
| Reg19-E-244 | One Newham | | Reg19-E-244/047 | Green and Water Spaces | | | | | | | | | | | | | | | Still not enough green space planned - which is already much lower in lbn than other london Boroughs | | <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 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.</p> <p>Over the Plan period, Newham’s population is projected to increase by just over 25 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 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces 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 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>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 Council is satisfied that the plan remains sound without the proposed changes.</p> |
| Reg19-E-244 | One Newham | | Reg19-E-244/048 | Green and Water Spaces | | | | | | | | | | | | | | | Good thstvtethe is a planned growing strategy. This should also ideally ne linked to combating food poverty | | Support noted. |