

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-244/035	Building a Fairer Newham	BFN3 Social Value and HIA														<div>Buildings and places are key to delivering sustainable social value and impact.</div> <div>The Social Value and Health Impact Assessment is helpful in focussing community groups on desired outcomes but it needs to be reconfigured to encourage, rather than stifle growth.</div>		<div>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy BFN3 addresses the need to achieve sustainable development, as set out in the IIA. It is considered that the policy takes a proportionate approach to the need to undertake a Social Value-Health Impact Assessment (SV-HIA).</div> <div>The objective of the SV-HIA tool is to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing.</div> <div>The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</div> <div>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</div>

Reg19-E-244	One Newham		Reg19-E-244/036	Building a Fairer Newham	BFN3 Social Value and HIA													<p>Rental discounts for Community facilities are currently capped at 80% of a notional ‘market rent.’</p> <p>This is both morally and pragmatically wrong.</p> <p>Even a 20% contribution of a notional ‘market rent’ is in effect a Charity Tax.</p> <p>Charitably raised funds that could be spent on providing community services and developing charities’ infrastructure are being diverted to LBN for no direct benefit to the communities they serve.</p> <p>For instance, a community centre with a full management and maintenance lease, providing services the council would like to deliver but can’t afford, could pay more than half a million pounds over the course of a 30-year lease. As an aging Chair of a local charity, I could never agree to burden future generations of volunteers with such a commitment.</p> <p>In terms of the council’s budget these amounts are insignificant but they would be crippling for local charities. Payments would have to come out of unrestricted reserves that are the life-blood for sustainability and development of services.</p> <p>To pay a rent of even £10k per year would cost charities much more to raise. Fundraisers would need to be employed in an increasingly difficult climate where grants to maintain vital services are getting harder and harder to obtain.</p> <p>Should charities relinquish use of council community buildings a lost opportunity cost should be factored into the Social Value assessment.</p> <p>Capital investment in council buildings by charity tenants dramatically increases the social and financial value of these assets. There would be a significant increase in cost to the council if these relationships end - even if it’s just providing security for empty buildings. That’s not to mention the terrible loss of community delivered social value.</p> <p>100% Social Value rent relief would mean charities could use their assets to attain and maintain delivery Quality Marks. Financially penalising charities for not having such marks is self-defeating. When money is tight this is the first sort of investment to be cut.</p> <p>On the other hand, genuine, intentional partnerships between LBN and community groups, could maximise resources and multiply impact. Agreed Social Value targets would ensure groups using council facilities are delivering vital and excellent services and help these groups to develop positive impact and sustainability. I would love to work in closer collaboration with LBN on this Community Wealth-building agenda.</p> <p>Specific example:</p> <p>NEWway/BDCA - 35 Vicarage Lane E6</p> <p>This derelict ex-council call centre was used to accommodate homeless guests as part of the SWEP protocol last winter.</p> <p>Once the need for this provision ended in March, BDCA/NEWway were offered a two-year meanwhile lease on the building. We invested</p>	<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 protection and provision of community facilities through Policy SI1 and SI2. This policy approach is justified by up to date evidence and through designations on relevant site allocations. The Local Plan cannot deliver the specific change you have requested. The Council’s Libraries &amp; Community Assets Team is best placed to engage with you regarding the issues you raise. Your comment has been passed onto the Council’s Libraries &amp; Community Assets 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
																			<p>more than £10,000 cash and hundreds of volunteer hours in bringing the building back into use. It is currently housing services including our Family Hub, supporting families without recourse to public funds, food bank, food club and debt advice centre. We also offered to make spaces available for SWEF this winter, linked in with support from NEWway, based in the Bobby Moore Pavilion on Flanders Field.</p> <p>LBN is actually saving money, without the need for security costs. But we were asked to pay an annual rental to LBN initially of £21,750 pa. This was later reduced to c£10.5k.</p> <p>Had I have known that a rental charge was envisaged, I would never have agreed to negotiations starting with LBN. The building would still be derelict, costing LBN money and depriving our community of much needed services.</p>		
Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/002	Homes	H10 Gypsy and Traveller Accommodation						Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>2. Allocation of Land for Burial Spaces</p> <p>Given the increasing demand for burial spaces, particularly for Muslim and other faith-based burials, it is crucial that the Local Plan allocates sufficient land to meet these needs. The Council should work closely with religious communities to identify suitable sites and ensure that the burial practices of these communities are respected and accommodated. This could include considerations for environmentally sustainable burial practices that align with religious customs.</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-C-017	Tom Clarke MRTPI		Reg19-C-017/001	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	We suggest that part iii of this policy should be deleted. This is because parts i. and ii. sufficiently deal with re-provision. Part iii. undermines the effectiveness of the policy and therefore also its conformity with the NPPF because it could provide an opportunity to lose a facility without needing to demonstrate evidence of lack of need or marketing under part b. The existence of two similar types of facility does not mean that one could adequately accept the demand and offer of the other.	<del>Deletion of part iii. of SI1.1, so that all proposals for loss of a facility are robustly assessed against the criteria within part b.</del>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Only if the loss of a facility can be demonstrated as being acceptable then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location). This approach is therefore considered to be effective and in conformity with the NPPF and the London Plan.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-011	Southern Housing		Reg19-E-011/004	Social Infrastructure	SI1 Existing community facilities and Health facilities														[We also welcome the emphasis placed on social infrastructure (policies BFNI] and SI1)) [...]. [It is also encouraging that these amendments have been made in response to comments received in response to the Regulation 18 consultation and that they are based on up to date evidence.]		Support noted.

Reg19-E-030	Susan Masters		Reg19-E-030/009	Social Infrastructure	SI1 Existing community facilities and Health facilities					3.124									3.124 – Looking at the map in the Newham Community Facilities Needs Assessment, I feel this misses many of the smaller locations offering similar activities. To this end I feel this needs revisiting to capture the full picture of local facilities available		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</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>and local need for the proposed facility.</p> <p>Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/012	Social Infrastructure	SI1 Existing community facilities and Health facilities														<p>3.1 Policy SI1 seeks to protect existing community facilities including education facilities. It allows reconfiguration and relocation subject to appropriate reprovision.</p> <p>3.2 NewVlc and Newham College support the premise of the policy which aligns with the NPPF and London Plan.</p>		Support noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/015	Social Infrastructure	SI1 Existing community facilities and Health facilities														<p>3.6 There is a need for draft Policy SI1 to facilitate the improvement of new education facilities within Newham in order to meet the needs of the Borough. With population growth in the Borough anticipated to reach 400,000 by 2030, and with more than 45% of the growth being from the under 25 year age bracket, there is a critical need to ensure the Borough can provide the right amount and type of sixth form and further education provision. Being the largest provider in the Borough, NewVlc is key to meeting that need.</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 through Newham's Places for All Strategy. Policy SI4: Education and childcare facilities The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/016	Social Infrastructure	SI1 Existing community facilities and Health facilities														<p>3.7 In this respect, new development at NewVlc and Newham College will need to meet the terms of Policy SI1. We therefore seek the following changes to the policy:</p>		Comment noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/017	Social Infrastructure	SI1 Existing community facilities and Health facilities														<p>[3.7 In this respect, new development at NewVlc and Newham College will need to meet the terms of Policy SI1. We therefore seek the following changes to the policy:]</p>	<p>• Criterion 1: delete ‘reconfigured’. The reconfiguration of education floorspace should not trigger the requirements of the policy, particularly if floorspace and/or student numbers are not changing. It may be appropriate to allow a threshold of say 1,000 sq m, below which reconfiguration would not trigger the policy.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. 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-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/018	Social Infrastructure	SI1 Existing community facilities and Health facilities														[3.7 In this respect, new development at NewVlc and Newham College will need to meet the terms of Policy SI1. We therefore seek the following changes to the policy:]	• Criterion 1: delete or clarify ‘reduced in size’. It is assumed this relates to floorspace, but a more appropriate definition of size would be number of students. At NewVlc, for example, due to the nature of specialist spaces, some parts of the campus are under utilised. Such buildings could be rationalised or demolished without impacting on student numbers.	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/019	Social Infrastructure	SI1 Existing community facilities and Health facilities														[3.7 In this respect, new development at NewVlc and Newham College will need to meet the terms of Policy SI1. We therefore seek the following changes to the policy:]	• Criterion 1 b ii: the requirement for surplus land or buildings to be marketed for 12 months is onerous and should be either deleted – if the provider has an up to date estate strategy – or reduced to 6 months in order to ensure efficient delivery of new education facilities. A 12 month marketing campaign is unnecessary to test demand. Furthermore, removal of temporary buildings at NewVlc (BU Block and G Block) would trigger the need for marketing of these buildings, which given that they are temporary, is inappropriate.	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/020	Social Infrastructure	SI1 Existing community facilities and Health facilities														4.3 In order to assist in the delivery of new education facilities, we recommend that the policy is amended as follows:	Criterion 2: the requirement that any alternative use should be ‘the maximum viable amount of affordable housing’ will impact on the potential to realise a capital receipt for investment in education and may undermine the requirement to achieve mixed and balanced communities. The exclusion of other uses, employment for example, and other forms of housing, such as student housing or housing for older people example, is restrictive and does not allow a site to respond to market forces. The preference for affordable housing ignores the findings of Newham’s Strategic Housing Market Assessment, Housing for Older People Topic Paper and Employment Land Review.	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.



Reg19-E-043	David Anderson		Reg19-E-043/003a	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>Why I consider the Local Plan is Unsound</p> <p>The local plan is unsound because it relies on Newham’s Community Facilities Needs Assessment (Publica, 2022) as an evidence base which is not accurate. The data cannot be used to adequately justify planning policy. The evidence base was acknowledged by the authors, Publica to require further research: “To gain an overview of the types and location of services within them, the e-questionnaire asked facility managers to state which services were provided and for organisations and services to state which facilities they used. However due to the limited responses in the e-questionnaire, it did not provide enough data on the types of services being delivered within community facilities.” ( p 89, Newham’s Community Facilities Needs Assessment, Publica, 2022).</p>	<p>3.124 There is an uneven distribution of community facilities across the borough. <del>Newham’s Community Facilities Needs Assessment (2022) has established that a number of the largest site allocations in the south of the borough are within areas that currently have few community facilities. The neighbourhood areas of Manor Road, Gallions Reach, Royal Albert North and Three Mills have the fewest community facilities with less than 5 facilities in each area. In contrast, Stratford and Maryland has the highest number of facilities with 67 followed by Plaistow with 50. The highest density of facilities can be found in Green Street (25 facilities per Km2) followed by Plaistow and Stratford and Maryland (20 and 18.5 facilities Km2 respectively).</del></p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	---	--	--



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003b	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>Newham’s Community Facilities Needs Assessment (2022) is explicitly referred in the Local Plan. The lack of accurate data has a significant impact as faith buildings overall are a very significant community resource with nearly half of all available for community use “Facility typologies: The study has identified 416 community facilities in the borough. 49% are places of worship with 206 locations, which represents the largest proportion of facilities by type.” (p 19 Key findings and recommendations, section 2, 2.2.1, Newham Community Facilities Needs Assessment, Publica, 2022).</p> <p>Many Churches provided community hall and other services when not needed for faith events. During the Victorian era church halls were built to accommodate faith activity and community activity in separate buildings. This division is sometimes still maintained where the church building has historic value (listed) which also make adaptations difficult and costly. A large number of Newham churches have been repaired or rebuilt following bombing damage during 1939-45. This has led in recent decades to a different path to sustainable operation for the many Newham churches. Non listed buildings have no recourse to historic preservation funds. In order to remain sustainable or to further their charitable social wellbeing mission, Newham Churches have evolved their operation over many decades. Some have purely faith practice would be described under planning class F1 (f) and many have multiple congregations using a variety of spoken language, ( p 61, section 5.5.1, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). None however could now serve or seek to serve a 15 minute neighbourhood exclusively.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003c	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>Recognised in ( p 61, section 5.5.1, point 5, Newham Community Facilities Needs Assessment, Publica, 2022). Many churches still maintain F2 (b), Sui Generis and F1(a) class use, many need to maintain class E (f) day nursery use. Much of this was captured in the past under the old planning class of order D1. Following the significant changes to the Use Classes Order in England in The Town and Country Planning (Use Classes) Order 1987 the continued lawful use outside F1 (f) remains unclear. It would appear that actual building use is misunderstood from the baseline mapping in section 4.0 of the Newham Community Facilities Needs Assessment, p 38 – 48. It would also appear that social infrastructure is recorded as having, either a single planning classification, or that other use classes have been have been omitted. The 15 minute isochrones are therefore inaccurate and cannot provide appropriate evidence to justify planning policy. Obvious examples of this would be St Bartholomew’s Barking Road E6 3BA and St Paul’s East Ham E6 2EU which have a number of uses beyond F1 (f) use class and are both not properly recorded in the Isochrone mapping or the neighbourhood maps.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003d	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>This would mean that under the Assessment Methodology p 8, section 1.1.4, (Newham Community Facilities Needs Assessment, Publica, 2022) the following study objectives could not have been achieved and the assessment unsound:</p> <ul style="list-style-type: none"><li>• Objectives 1, 3, 4, 5 &amp; 9</li></ul> <p>The following data is also incorrect:</p> <ul style="list-style-type: none"><li>• Appendix B Tables and calculations on p 96, - 100</li><li>• Section 4 Baseline mapping p 38 – 48 (Newham Community Facilities Needs Assessment, Publica, 2022)</li></ul>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		



Reg19-E-043	David Anderson		Reg19-E-043/003e	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>In addition the Facilities Audit in Newham Community Facilities Needs Assessment, Publica, 2022, site assessment in section 7.0, p 78 The sample set was not representative:</p> <ul style="list-style-type: none"><li>• A majority new build or refurbished (which is highly atypical)</li><li>• 5 of 9 included from a single community organisation</li><li>• No faith sector buildings where included (49% of all community buildings)</li></ul> <p>The Local Plan is not therefore justified by the evidence in regard to social infrastructure. Newham would need to fully accept the recommendations on p 89 of The Newham Community Facilities Needs Assessment, Publica, 2022) and undertake the studies recommended for the assessment to produce accurate policy reference information.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003f	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>The recommendations that need to be undertaken are as follows:</p> <p>8.1.2. Additional use classes: Feedback on the study highlighted certain use-class groups and/or types of facilities which could be included in the baseline mapping including residential would provide more detailed quantitative and qualitative information about the types and location of service provision in the borough in relation to community demand.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003g	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.5. Further information on affordability: To gain a meaningful understanding of affordability across the borough, a separate detailed investigation could be undertaken. This may cover varying aspects of affordability including:</p> <ul style="list-style-type: none"><li>• Affordability for organisations who hire space</li><li>• Affordability for facilities managers to run and maintain the space</li></ul>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003h	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.6. Comparison study to other London boroughs: Through speaking to other boroughs undertaking similar studies including 15-minute neighbourhoods, the quantum, distribution and density of community facilities could be obtained. This would allow a comparison to take place to benchmark Newham and understand deficiency or proficiency of community infrastructure in relation to other London boroughs.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	---	--



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003i	Social Infrastructure	SI1 Existing community facilities and Health facilities				3.124		Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.3. Location and types of services within community facilities: The baseline mapping focussed on locating community facilities across the borough. To gain an overview of the types and location of services within them.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	-------	--	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003j	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>Why I consider the Local Plan is Unsound</p> <p>The local plan is unsound because it relies on Newham’s Community Facilities Needs Assessment (Publica, 2022) as an evidence base which is not accurate. The data cannot be used to adequately justify planning policy. The evidence base was acknowledged by the authors, Publica to require further research: “To gain an overview of the types and location of services within them, the e-questionnaire asked facility managers to state which services were provided and for organisations and services to state which facilities they used. However due to the limited responses in the e-questionnaire, it did not provide enough data on the types of services being delivered within community facilities.” ( p 89, Newham’s Community Facilities Needs Assessment, Publica, 2022).</p>	<p>SI1.1 An assessment is likely to require evidence of the following:</p> <ul style="list-style-type: none"><li>• an excess of facility provision</li><li>• - Applicants wishing to demonstrate that an existing community facility is not needed should consult Newham’s Community Facilities Needs Assessment (2022). Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. The maps take into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.</li></ul>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	---	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003k	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>Newham’s Community Facilities Needs Assessment (2022) is explicitly referred in the Local Plan. The lack of accurate data has a significant impact as faith buildings overall are a very significant community resource with nearly half of all available for community use “Facility typologies: The study has identified 416 community facilities in the borough. 49% are places of worship with 206 locations, which represents the largest proportion of facilities by type.” (p 19 Key findings and recommendations, section 2, 2.2.1, Newham Community Facilities Needs Assessment, Publica, 2022).</p> <p>Many Churches provided community hall and other services when not needed for faith events. During the Victorian era church halls were built to accommodate faith activity and community activity in separate buildings. This division is sometimes still maintained where the church building has historic value (listed) which also make adaptations difficult and costly. A large number of Newham churches have been repaired or rebuilt following bombing damage during 1939-45. This has led in recent decades to a different path to sustainable operation for the many Newham churches. Non listed buildings have no recourse to historic preservation funds. In order to remain sustainable or to further their charitable social wellbeing mission, Newham Churches have evolved their operation over many decades. Some have purely faith practice would be described under planning class F1 (f) and many have multiple congregations using a variety of spoken language, ( p 61, section 5.5.1, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). None however could now serve or seek to serve a 15 minute neighbourhood exclusively.</p>		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	---	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		



Reg19-E-043	David Anderson		Reg19-E-043/003I	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>Recognised in ( p 61, section 5.5.1, point 5, Newham Community Facilities Needs Assessment, Publica, 2022). Many churches still maintain F2 (b), Sui Generis and F1(a) class use, many need to maintain class E (f) day nursery use. Much of this was captured in the past under the old planning class of order D1. Following the significant changes to the Use Classes Order in England in The Town and Country Planning (Use Classes) Order 1987 the continued lawful use outside F1 (f) remains unclear. It would appear that actual building use is misunderstood from the baseline mapping in section 4.0 of the Newham Community Facilities Needs Assessment, p 38 – 48. It would also appear that social infrastructure is recorded as having, either a single planning classification, or that other use classes have been have been omitted. The 15 minute isochrones are therefore inaccurate and cannot provide appropriate evidence to justify planning policy. Obvious examples of this would be St Bartholomew’s Barking Road E6 3BA and St Paul’s East Ham E6 2EU which have a number of uses beyond F1 (f) use class and are both not properly recorded in the Isochrone mapping or the neighbourhood maps.</p>		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	--	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003m	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>This would mean that under the Assessment Methodology p 8, section 1.1.4, (Newham Community Facilities Needs Assessment, Publica, 2022) the following study objectives could not have been achieved and the assessment unsound:</p> <ul style="list-style-type: none"><li>• Objectives 1, 3, 4, 5 &amp; 9</li></ul> <p>The following data is also incorrect:</p> <ul style="list-style-type: none"><li>• Appendix B Tables and calculations on p 96, - 100</li><li>• Section 4 Baseline mapping p 38 – 48 (Newham Community Facilities Needs Assessment, Publica, 2022)</li></ul>		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	--	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003n	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>In addition the Facilities Audit in Newham Community Facilities Needs Assessment, Publica, 2022, site assessment in section 7.0, p 78 The sample set was not representative:</p> <ul style="list-style-type: none"><li>• A majority new build or refurbished (which is highly atypical)</li><li>• 5 of 9 included from a single community organisation</li><li>• No faith sector buildings where included (49% of all community buildings)</li></ul> <p>The Local Plan is not therefore justified by the evidence in regard to social infrastructure. Newham would need to fully accept the recommendations on p 89 of The Newham Community Facilities Needs Assessment, Publica, 2022) and undertake the studies recommended for the assessment to produce accurate policy reference information.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003o	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>The recommendations that need to be undertaken are as follows:</p> <p>8.1.2. Additional use classes: Feedback on the study highlighted certain use-class groups and/or types of facilities which could be included in the baseline mapping including residential would provide more detailed quantitative and qualitative information about the types and location of service provision in the borough in relation to community demand.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	--	--



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003p	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.5. Further information on affordability: To gain a meaningful understanding of affordability across the borough, a separate detailed investigation could be undertaken. This may cover varying aspects of affordability including:</p> <ul style="list-style-type: none"><li>• Affordability for organisations who hire space</li><li>• Affordability for facilities managers to run and maintain the space</li></ul>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003q	Social Infrastructure	SI1 Existing community facilities and Health facilities					SI1.1	Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.6. Comparison study to other London boroughs: Through speaking to other boroughs undertaking similar studies including 15-minute neighbourhoods, the quantum, distribution and density of community facilities could be obtained. This would allow a comparison to take place to benchmark Newham and understand deficiency or proficiency of community infrastructure in relation to other London boroughs.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003r	Social Infrastructure	SI1 Existing community facilities and Health facilities						SI1.1	Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.3. Location and types of services within community facilities: The baseline mapping focussed on locating community facilities across the borough. To gain an overview of the types and location of services within them.</p>		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	-------	-----	----	--	--	--	--	--	-----	---	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/004a	Social Infrastructure	SI1 Existing community facilities and Health facilities												Yes	No												Yes	<p>Why I consider the Local Plan is Unsound</p> <p>The local plan is unsound because restrictions are being placed on the planning support criteria that are counterproductive to maintaining community charitable benefit. This relies on sustainable social infrastructure. This is at odds with the stated aim of promoting and protecting social infrastructure, it is therefore not an effective policy in this regard. The operation of church buildings would appear to be not properly understood and consequently the Local Plan in regard to these buildings cannot be justified. Only with further informed discussion could the issues be clarified and resolved. This submission will refer to christian church buildings, with which I am knowledgeable, however my submission may well apply to other faith buildings that provide more charitable social benefit than incorporated in the planning order F1 (f).</p> <p>The Local Plan could have an unintended, significant, negative impact on Social infrastructure availability in Newham</p> <p>Faith buildings overall are a very significant community resource with nearly half of all available for community use. “The study has identified 416 community facilities in the borough. 49% are places of worship with 206 locations, which represents the largest proportion of facilities by type.” (p 19 Key findings and recommendations, section 2, 2.2.1, Newham Community Facilities Needs Assessment, Publica, 2022). Any negative impact of the Local Plan on the sustainability of church buildings will significantly and negatively affect the supply and access to community infrastructure in Newham.</p> <p>The financial sustainability of churches is a pressing issue for Newham church governance, ( p 61, section 5.3.4, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). Churches are facing financial challenges of aging buildings and increasing demands on the performance of public buildings and their operation. For example, almost all will be affected by The Energy Efficiency (Private Rented Property) (England and Wales) (“MEES”) Regulations 2015. Many require alteration to meet the new MEES regulations on thermal efficiency, particularly if they generate funds though leases or lettings for charitable activity. Undertaking building adaption and updating they would be caught up in the definition within policy SI 2 as a ‘re-provision’ of their social infrastructure in line with policy definition Policy SI 2. p 165. SI 2.5 “For the purposes of this policy, re-provision can range from a simple minor extension to extensive modernisation, expansion or total rebuild of a community facility”.</p>	SI1: Existing community facilities and health facilities p 154	<p>1. Existing facilities will be protected and should not be lost to other uses, <del>reconfigured, reduced in size or relocated</del> unless it can be demonstrated that the following criteria are met:</p> <p>a. The needs of the current users of the facility, potential or future users (where the facility is not in use) are met through:</p> <p>i. provision of a suitable on-site replacement facility; or</p> <p>ii. a suitable off-site replacement, within the local well-connected neighbourhood of the original facility; or</p> <p><del>iii. an existing local facility, within the local well connected neighbourhood which is suitable, available and affordable; or</del></p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	---	--	--	--	--	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	--	--	--	--	--	--	-----	--	--	---	--



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/004b	Social Infrastructure	SI1 Existing community facilities and Health facilities													Yes	No											Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The stated aim of the Local Plan toward churches is effectively undermined by the policy provisions in Policy Si 1 and SI 2</p> <p>The planning intention of the policies is stated as “to protect and promote social infrastructure, both those in public and private ownership, to meet the needs of Newham’s growing population”. (p 153 clause 3.122) The continued availability of Church buildings is therefore stated as a Local plan policy priority. Many Churches provided community hall and other services when not needed for faith events. During the Victorian era church halls were built to accommodate faith activity and community activity in separate buildings. This division is sometimes still maintained where the church building has historic value (listed) which also make adaptations difficult and costly. A large number of Newham churches have been repaired or rebuilt following bombing damage during 1939-45. This has led in recent decades to a different path to sustainable operation for the majority of Newham churches. Non listed buildings have no recourse to historic preservation funds. In order to remain sustainable or to further their charitable social wellbeing mission, Newham Churches have evolved their operation over many decades. Some have purely faith practice use planning class F1 (f) indeed many have multiple congregations using a variety of spoken language ( p 61, section 5.5.1, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). None however could now serve, or seek to serve a 15 minute neighbourhood exclusively. This is recognised in ( p 61, section 5.5.1, point 5, Newham Community Facilities Needs Assessment, Publica, 2022). Many churches still maintain F2 (b), Sui Generis and F1(a)class use, many need to maintain class E (f) day nursery use. Much of this was captured in the past under the old planning class of order D1. Following the significant changes to the Use Classes Order in England in The Town and Country Planning (Use Classes) Order 1987 the continued lawful use outside F1 (f) remains unclear. To clarify this anomaly ought be within the remit of Newhams Local plan, however the consequence to the operation of a majority of churches in Newham could be catastrophic with many forced to curtail or cease their charitable work and benefit to Newham residents. If one looks at any of the baseline mapping in section 4.0 of the Newham Community Facilities Needs Assessment, p 38 – 48. It would appear that Social infrastructure is recorded as having, either a single planning classification, or that existing use classes have been have been omitted. The 15 minute isochrones are therefore inaccurate and cannot provide appropriate evidence to justify planning policy. A separate submission relates to the short comings of the assessment data.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</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>and local need for the proposed facility.</p> <p>Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-043	David Anderson		Reg19-E-043/004c	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The policy aspiration for churches to re-provide their buildings in local centres is untenable</p> <p>The policies SI1 &amp; 2 are “ designed to enable community/charity/market-led community facilities to come forward in the most appropriate locations” (Local Plan p 152 para 4, 3.118). However the provisions in the policy would appear to indicate that churches have unfortunately been built in the wrong location for the policy objectives, because the single most important factors are:</p> <ul style="list-style-type: none"><li>• That social infrastructure with wider catchments are built on high streets or town centres (Policy SI2, p 159, clause 2 ) &amp; (p 162, clause SI2.2, para 1) without regard to differing requirements of different social infrastructure.</li></ul> <p>Or</p> <ul style="list-style-type: none"><li>• That they serve a majority of users within a 15 minute neighbourhood. ( SI2 p 159, clause 3).</li></ul> <p>Currently only 17% of existing community facilities are located within town or local centres (p 23 section 2.3.1 Newham Community Facilities Needs Assessment). It would follow that the policy appears to advocate that many facilities including churches would need to be rebuilt in town or local centres. The problem is recognised on (p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022).</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <ol style="list-style-type: none"><li>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</li><li>b. there are no unacceptable transport and highways impacts; and</li><li>c. it can be demonstrated that the scheme has been designed to be neighbourly;</li></ol> <p>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-043	David Anderson		Reg19-E-043/004d	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Leaving aside historic (listed) churches that cannot be rebuilt or re-provided in a new location. The relocation of churches is problematic for the following reasons:</p> <ul style="list-style-type: none"><li>• Throughout the development of Newham neighbourhoods Churches have provided community services such as funerals and weddings which are incompatible with commerce and traffic in local centres.</li><li>• The demand and cost of leases or land on high streets and local centres are beyond the majority of charities.</li><li>• The substantial cost benefit of relocation.</li></ul> <p>It would clearly be more cost effective to provide public transport to social infrastructure where it is currently located. Public transport does not as yet provide effective provision in the East section of the East Ham Neighbourhood, TPAL is at 1a or 1b, (p 14 of the Newham Sustainable Transport Strategy Figure 11 ‘Public Transport Accessibility Levels’) This is the subject of a separate submission on the Transport policy T2.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-043	David Anderson		Reg19-E-043/004e	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The Local Plan introduces additional requirements and burdens on church governance, capital works and charitable programmes that have no recourse to public funds, further eroding the viability of some social infrastructure buildings.</p> <p>Charitable social infrastructure building governance may also face provisions in Policy SI 1 that facilities should not be “reconfigured, reduced in size or relocated’ unless the needs of current or future users are met. This provides difficulties in the following ways:</p> <p>Governance is directed by charity trustees funded by charitable gifts of time and donations. Governance might be negatively affected by the policy. It would be easy under Policy SI 1 for a group of community users to argue their right to use social infrastructure for a community purpose is protected even though the use is judged unsustainable or uneconomic by the charity trustees of a building. Users are given rights both on Infrastructure provision for an ‘availability’ test for ‘times they wish to use the space’ and ‘affordability’ test in SI 1.1 p156. This bears no reference to the true cost of providing charitable facilities and service providers have no regular recourse to public funding. Of over 40,000 churches in the UK “ none gets guaranteed government funding. All rely on Charity” ( p 4, The House of Good, The economic and social value of church buildings in the UK, National Churches Trust, 2020).</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1 is intended to protect the users of existing community facilities, such as churches. However, as set out in SI1.1, community facilities can be lost to other uses, reconfigured, reduced in size or relocated if it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Provided it could be demonstrated that the criteria met, development of an existing church could offer a different type of community facility to that provided on-site currently.</p> <p>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-043	David Anderson		Reg19-E-043/004f	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Policy SI 1 p154 provides for existing churches facing unsustainable financial use would need to:</p> <ul style="list-style-type: none"><li>• be actively marketed for the use within the local 15 minute neighbourhood (clause 1b ii.) It is highly unlikely that a church required to serve mostly people living mostly in its neighbourhood would be marketable. ( 67% in the previous Newham Local plan ).</li></ul>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1 is intended to protect the users of existing community facilities, such as churches. However, as set out in SI1.1, it is possible for community facilities to be lost to other uses, reconfigured, reduced in size or relocated if it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Depending on the proposal this could mean that a community facility, such as a church, would need to be actively marketed for social infrastructure, not necessarily a church, use for at least 12 months. This is type of protection, towards existing community facility uses, is a recognised policy approach in Local Plans and is in accordance with the requirements of the NPPF (2023, para.97) and London Plan (Policy S1) (2021).</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-043	David Anderson		Reg19-E-043/004g	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The policy as drafted would also require an existing church building wanting to improve and modernise its building to be more sustainable to be further constrained in disposal of uneconomic parts of their site by purchasers:</p> <ul style="list-style-type: none"><li>• Only appealing to a local neighbourhood if located outside a town centre (section 3 p 159).</li><li>• The facility being easily accessible by public transport (section 3 p 159)</li><li>• Newham’s own plans to deliver new community infrastructure potentially without regard to the existing charity or its beneficiaries.</li></ul> <p>The Local Plan should have a requirement for effective existing charitable Social Infrastructure to be properly included in stakeholder consultation</p> <p>As a church facilities manager I am unaware of any church building in Newham that only appeals to a local neighbourhood. (p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022). If congregations where largely restricted to local neighbourhood populations and membership most would eventually close and be lost as community infrastructure in direct contravention of policy SI 1.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>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-043	David Anderson		Reg19-E-043/004h	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Policy Map reference N13.SA3 p 563 para 4 indicates a new community facility is needed. This policy could enforce a right to provide publicly funded community facilities in direct competition to an existing charitably funded facilities neighbouring the site. The church has provided both faith worship and community services in order to deliver sustainable community value and benefit. There has been no direct communication between Newham or the housing developer and St Paul's Church which is next to site N13.SA3. The plans have been progressed without discussion or consultation despite attempts to initiate communication, despite recommendations in ( p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022). This makes the proposals in the Local plan p 161 – 164 unjustified as the proposals cannot have taken into consideration the impact on St Pauls as a community infrastructure stakeholder and provider.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as any future application for a new facility in the neighbourhood would need to meet Policy SI2.1.c. The implementation text for this clause sets out that applicants should speak with the council early in the application process to understand what evidence is required to support a needs based assessment for a facility. A needs-based assessment is likely to require evidence of the following:</p> <ul style="list-style-type: none"><li>• an up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. Each facility location should have its 15 minute walking radius mapped (using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users).</li><li>• applicants for a community facility proposal should consult Newham's Community Facilities Needs Assessment (2022) to ascertain the current provision of community facilities in the borough and whether or not the site is in an area of deficit. A proposals neighbourhood will depend on the type of service it is offering. Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. The mapping in the Community Facilities Needs Assessment (2022) takes into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.</li><li>• recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</li></ul> <p>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-043	David Anderson		Reg19-E-043/005c	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The policy aspiration for churches to re-provide their buildings in local centres is untenable</p> <p>The policies SI1 &amp; 2 are “ designed to enable community/charity/market-led community facilities to come forward in the most appropriate locations” (Local Plan p 152 para 4, 3.118). However the provisions in the policy would appear to indicate that churches have unfortunately been built in the wrong location for the policy objectives, because the single most important factors are:</p> <ul style="list-style-type: none"><li>• That social infrastructure with wider catchments are built on high streets or town centres (Policy SI2, p 159, clause 2 ) &amp; (p 162, clause SI2.2, para 1) without regard to differing requirements of different social infrastructure.</li></ul> <p>Or</p> <ul style="list-style-type: none"><li>• That they serve a majority of users within a 15 minute neighbourhood. ( SI2 p 159, clause 3).</li></ul> <p>Currently only 17% of existing community facilities are located within town or local centres (p 23 section 2.3.1 Newham Community Facilities Needs Assessment). It would follow that the policy appears to advocate that many facilities including churches would need to be rebuilt in town or local centres. The problem is recognised on (p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022).</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/029	Social Infrastructure	SI1 Existing community facilities and Health facilities														We note that in relation to the re-provision of community spaces, paragraph 2 of draft Policy S11 states that if the loss of a facility can be demonstrated as being acceptable to the Council, then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location).		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/030	Social Infrastructure	SI1 Existing community facilities and Health facilities										No	No			Paragraph 20 of the NPPF states that strategic policies should make sufficient provision for community facilities including health, education and cultural infrastructure. We therefore consider the requirements of the above policy are not consistent with national policy. This could have an effect on unnecessary constraining development and would therefore not be effective in its delivery	<p>The draft policy should instead be amended to allow for the consideration of alternative community facilities as well as the provision of affordable housing, particularly if the scheme is already delivering policy compliant affordable housing. The draft policy allows for no diversification of community facilities unless in specified locations, this will ultimately lead to the loss of community facilities, which as per paragraph 97 of the NPPF, should be resisted.</p> <p>Making these changes to the wording of Policy S11 would ensure that the draft Local Plan is consistent with national policy and effective in delivery.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Only if the loss of a facility can be demonstrated as being acceptable then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location). This approach is therefore considered to be effective and in conformity with the NPPF and the London Plan.</p> <p>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-082	NHS Property Services		Reg19-E-082/005	Social Infrastructure	SI1 Existing community facilities and Health facilities						Yes	Yes						Yes	<p>Draft Policy SI1 seeks to protect existing community facilities. NHSPS supports the provision of sufficient, quality community facilities and welcomes the proposed policy approach which is considered to be positively prepared or effective in its current form, and will ensure the NHS has the ability to ensure the delivery of essential facilities and services for the community.</p> <p>The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area.</p> <p>All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.</p> <p>Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. NHSPS welcomes the wording of Policy SI1 Part 1 which requires compliance with criteria (a) or (b), and (c). Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS as part of a published estates strategy or service transformation plan, we consider this would satisfy Policy SI1 Part 1(b)(iii) and therefore no other sub-criteria listed under Part 1(a) or (b) would be required to be satisfied. This ensures the NHS has the ability to ensure the delivery of essential facilities and services for the community.</p> <p>NHSPS therefore considers Policy SI1 positively prepared and effective, and therefore sound.</p>	<p>N/A</p> <p>NHSPS considers Policy SI1 sound as currently drafted.</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-226	NHS North East London		Reg19-E-226/010	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	Blank						Blank	<p>NHS NEL supports the protection of existing health facilities and recognises that affordable housing is a nationwide priority which must be robustly supported through national, regional, and local planning policy. However, NHS NEL would like to see a little more flexibility within the wording of this policy to allow for the disposal of existing health facilities where required. In terms of the tests of soundness this will ensure that the policy is effective through improving the delivery of the Local Plan.</p> <p>By way of background, disposal of existing health facilities will occur when dictated by the NHS North East London Integrated Care Board Infrastructure Strategy, and money secured through disposal will be reinvested into other health infrastructure within the borough. A key source of funding for improvement and expansion of health infrastructure is through S106 planning obligations but the rate of population growth in North East London cannot be supported by developer contributions alone and there is a gap between demand for healthcare / population growth, and the rate of adaptation of health infrastructure to support that demand. Where sites can provide a revenue stream through redevelopment, that money can form a significant reinvestment into Newham’s existing and proposed health assets, freeing up developer viability to deliver more affordable housing and other planning obligations.</p> <p>Whilst as currently worded the policy allows for some exceptions, such as where the proposal forms part ‘of a strategy from a recognised public sector body’s estates programme’, the consolidation of healthcare services, in particular GP Surgeries may not fall within this category.</p>	<p>NHS NEL would therefore like clarity on this matter and suggest that it would be beneficial to include a definition of a recognised public sector body’s estates programme (or simply a definition for recognised public sector bodies) within Appendix 1: Glossary and Abbreviations. Through providing clarity on the definition the Local Plan’s conformity with the tests of soundness will be improved.</p>	<p>Comment noted. This comment has been subject to further discussion with NHS North East London Integrated Care Board and other NHS bodies 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.</p> <p>Both parties are satisfied that the plan remains sound without these 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-226	NHS North East London		Reg19-E-226/011	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	Blank						Blank	<p>Clause 2 of Policy SI1 suggests the preferred alternative use for the disposal sites will be for the maximum viable amount of affordable housing, but NHS Options and Needs Assessments contain opportunities for redevelopment as a mechanism of securing and reinvesting capital into its extensive health network. In order to meet the health needs in the borough without disrupting the ability of developers to bring forward viable schemes with policy compliant levels of affordable housing, the loss of a health facility on a site where the NHS owns the freehold should be able to provide standard market units for the purpose of acquiring funding to be reinvested in the London Borough of Newham.</p> <p>Notwithstanding the above, the opportunity for NHS sites to deliver key worker accommodation should not be prohibited by policy. The current Estates Strategy is exploring options for developing land for key worker accommodation which may not fall within the conventional models of affordable housing provision. Again, we would like the policy or justification text to reflect this, as key worker accommodation is essential to service delivery.</p>	<p>We therefore request that the wording of the policy is amended as follows (see additional text in bold):</p> <p>“the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location, <b>or where a recognised public sector body can demonstrate that the proposed use of land will generate revenue to be reinvested in existing or new social infrastructure in Newham as part of a recognised estates programme</b>)”.</p> <p>The amendment would ensure the plan is deliverable by granting more flexibility to the NHS to fund necessary infrastructure works, ensuring social infrastructure keeps pace with housing growth.</p>	<p>Comment noted. This comment has been subject to further discussion with NHS North East London Integrated Care Board and other NHS bodies 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.</p> <p>Both parties are satisfied that the plan remains sound without these changes.</p>
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/016	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	No						Blank	<p>The market’s community value</p> <p>4) Newham Community Facilities Needs Assessment omits Queen’s Market or any market from the list of facilities.</p> <p>COMMUNITY FACILITY TYPE</p> <p>Education with shared spaces</p> <p>Community centres</p> <p>Youth zones</p> <p>Social clubs</p> <p>Libraries</p> <p>Public houses</p> <p>Public toilets</p> <p>Places of worship</p> <p>Cultural facilities (music venues, dance halls, cinemas, theatres)</p> <p>Public halls or exhibition halls</p> <p>Cultural facilities (galleries)</p> <p>Cultural facilities (museums)</p>	<p>5) Policy SI1 repeats the list, but Paragraph 3.92 adds ‘This list is not intended to be exhaustive and other facilities may be considered community facilities’. Queen’s Market should be listed in the main list, or referred to here, just as it was listed in the 2018 Character Study above, under ‘key locations for the community’.</p>	<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 market in Policy HS4: Markets, pop-ups and meanwhile uses. 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-236	Friends of Queen's Market		Reg19-E-236/019	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	No						Blank	<p>[3. The Plan cannot protect the market: the Plan is not effective or deliverable] Policy SI1 and SI2. Because the Market is not named within the Community Facilities policy it does not benefit from the requirements of the policy when building or replacing those facilities, such as requiring a Social Value and Health Impact Assessment. This is why Queen’s Market needs to be named in this policy.</p>		<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 markets in Policy HS4: Markets, pop-ups and meanwhile uses.</p> <p>However, the Council recognises the importance of ensuring the Plan adequately protects markets and the value these spaces actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the high streets they are located in. Therefore, the Council proposes to address your concerns by proposing an amendment to Policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing.</p> <p>The objective of the SV-HIA tool is to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. The Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy BFN3:</p> <p>The following developments will be expected to submit a Health and Social Value Impact screening assessment:</p> <p>i. Major development</p> <p>ii. Loss, gain or reconfiguration of social infrastructure floorspace</p> <p>iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops</p> <p>iv. Loss, gain or reconfiguration of publicly accessible green space</p> <p><b>v. Development impacting an existing or creating a new internal or external permanent market</b></p> <p>For consistency an amend has also been drafted for the implementation text of HS4 to reference this addition.</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-236	Friends of Queen's Market		Reg19-E-236/023	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	No						Blank	<p>[5. Locations for remedies]</p> <p>SI1 Community Facilities</p> <p>[Supporting documents should include: Newham Markets Strategy and Policy Review (as above at 1A)</p> <p>Leeds University Markets4People Study (as above at 1E)</p> <p>GLA Understanding London’s Markets (2017)</p> <p>Remedies summarised below (these appear in the above text with more supporting detail)]</p>	<p>[5. Locations for remedies]</p> <p>Policy SI1 and SI2.</p> <p>Queen’s Market needs to be named as a community facility in this policy.</p>	<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 markets in Policy HS4: Markets, pop-ups and meanwhile uses.</p> <p>However, the Council recognises the importance of ensuring the Plan adequately protects markets and the value these spaces actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the high streets they are located in. Therefore, the Council proposes to address your concerns by proposing an amendment to Policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing.</p> <p>The objective of the SV-HIA tool is to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities.</p> <p>The Council proposes to include reference to the suggested documents in the Social Value-Health Impact Assessment Checklist Tool. In addition, the Council has drafted the following modification, which will be presented to the Inspector for their consideration, to Policy BFN3:</p> <p>The following developments will be expected to submit a Health and Social Value Impact screening assessment:</p> <p>i. Major development</p> <p>ii. Loss, gain or reconfiguration of social infrastructure floorspace</p> <p>iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops</p> <p>iv. Loss, gain or reconfiguration of publicly accessible green space</p> <p><b>v. Development impacting an existing or creating a new internal or external permanent market</b></p> <p>For consistency an amend has also been drafted for the implementation text of HS4 to reference this addition.</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-240	West Ham United Football Club	PMV Planning	Reg19-E-240/004a	Social Infrastructure	SI1 Existing community facilities and Health facilities						Blank	Yes						Blank	<p>Policy SI1</p> <p>Proposed policy SI1 has been introduced since the Regulation 18 stage and it relates to “existing community facilities and health facilities”. This policy seeks to protect existing facilities across the borough unless it can be demonstrated that they are not viable.</p> <p>Although we support the general aspiration of Policy SI1 which seeks to maintain good quality access to community and recreational facilities for the people of Newham, the policy should be worded differently to help encourage further investment to the area where appropriate.</p>	As set out in our previous representations, the stadium should be <b>recognised through a specific site allocation</b> under Policy N8 of the Plan.	Support noted. The West Ham United Football Club site and information provided did not meet the requirements set out in the Site Allocation and Housing Trajectory Methodology Note for inclusion as a site allocation. This does not prevent development or change occurring on the site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-007	Joana Simoes		Reg19-C-007/004b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>[...].</p> <p>Create youth centres, and spaces for the community. Namely the Plaistow library, a listed building, this should be recovered wit CIL money and be used for arts, workshops, special educations, mums and baby and other voluntary orgs. Instead, you omit in the plan that this will be redundant as the library will move further up, and you would look into selling this space for another betting shop, I wonder. [originally put against SI4, moved to SI2)</p>		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan already addresses the protection of existing and the provision of new community facilities, such as Plaistow Library through Policy SI1 and SI2. This policy approach is justified by up to date evidence, through the Community Facilities Needs Assessment and through designations on relevant site allocations. The Local Plan cannot deliver the specific change you have requested. The Council’s Libraries & Community Assets Team is best placed to engage with you regarding your aspirations for the future Plaistow Library. Your comment has been passed onto the Council’s Libraries & Community Assets Team. The Council is satisfied that the plan remains sound without the proposed change.

Social Infrastructure Comments to the [full Regulation 19 Representations](#)

Reg19-E-007	David Gilles		Reg19-E-007/015	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Blank	Blank					Blank	<p>12 Social Infrastructure P162 on: The text is not clear.</p> <p>There should be no sequential test for social and community facilities that meet a local/neighbourhood/area based need (rather than a more borough wide or even more geographically dispersed one) and which looked at in the round meet other reasonable requirements for social and community facilities, while being not overly intrusive.</p> <p>Genuinely community based and community supported applications from the proposed local users should be considered on their individual merits in respect of issues such as design, location, massing intensity of use, vehicle traffic, parking requirements, noise likely to be generated and so on.</p> <p>Conditions should be imposed where necessary to prevent the intention of a consent to be subverted at a later date through change of use or ownership.</p> <p>SI 1. 2. as a whole and S1 1. 3.<b>[should be SI2.2 and SI2.3]</b>, should be redrafted to make this much clearer.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 is intended to ensure convenient access to community and health facilities, as this allows a range of people to easily use the services they need. This means that it may be acceptable for some smaller facilities and those with a local user base to be located outside of a designated Town or Local Centre. In these cases, the users of the facility should be able to easily access the facility by foot or sustainable transport methods.</p> <p>Clause 3 of Policy SI2 allows a greater flexibility, than the adopted Local Plan (2018) with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA). This makes it easier for small scale social infrastructure to locate outside of a Town or Local Centre where prices are recognised as generally being higher than out-of-centre locations. This was a change from the Regulation 18 Local Plan, which had required applicants to undertake a sequential test within the list. We maintain that encouraging facilities to be located in either a Town or Local Centre is useful as it enables the creation of hubs which encourages use and prioritises areas which are under provided for with regard to community facilities.</p> <p>A new facility which is smaller than 1,000 sqm Gross Internal Area and have a local neighbourhood user appeal can be located outside of town or local centre where:</p> <p>a. the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly; and</p> <p>d. it is located in a:</p> <p>i. Neighbourhood Parade; or</p> <p>ii. next to a park or school; or</p> <p>iii. in an area of identified community facility deficit;</p> <p>Only if it is not located in one of the above three specified out-of-centre locations will it be required to undertake a sequential test, to demonstrate that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period.</p> <p>With regard to the use of conditions, clause 8 of Policy SI2 seeks to secure a social infrastructure facility for its specific intended use - although not a change of ownership.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/012	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Blank	Blank					Blank	<p>Other Matters</p> <p>3.12 In the interests of thoroughness, the following matters are also noted in respect of the emerging Local Plan and its supporting evidence base:</p> <p>i. Policy S12 notes at Point 4 that “speculative social infrastructure development will not be supported” and we consider that more clarity should be provided on this statement and how it will be applied in decision-making. It is assumed that this point has been included to</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Community Facilities Needs Assessment (2022) and the consultation undertaken with community groups as part of this work, has highlighted the downside of providing speculative community space. We do not wish to see vacant space or facilities which have been designed without considering who the end user is. A key recommendation from the CFNA (2022) was</p>

LB Newham Response		to avoid speculative community space. Community facilities often have specific design requirements, often distinct to each type. Safe guarding is a key consideration for many operators and some facilities need very specific layout and fit-outs to support their activities and management. The Council is satisfied that the plan is sound without the proposed changes.
Proposed modifications and explanation		
Representor Comment		ensure support for any proposal justified by reference to an identified need.
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		

Social Infrastructure Comments to the [full Regulation 19 Representations](#)

Reg19-E-030	Susan Masters		Reg19-E-030/005	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														While I agree with most of the content here, the approach feels very reactive – focussed on doing no harm in the removal of facilities or ensuring that new proposals align with the wishes of service providers.		<p>Support noted. 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. Newham’s Community Facilities Needs Assessment (2022) provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities.</p> <p>Additionally, we have worked with Sport England and relevant stakeholders on the development of Newham's Playing Pitch Strategy and Built Leisure Needs Assessment. The need for educational uses, childcare or healthcare facilities across the Plan period, have been informed by Newham’s Places for All Strategy, Newham's Childcare Sufficiency Assessment. Throughout the development of this evidence base we have undertaken partnership working with Newham’s Education, Parks and Leisure teams, NHS London Healthy Urban Development Unit (HUDU) and NHS partners.</p> <p>Local Policy SI2 sets out that new, expanded and improved community and health facilities, will be supported where it is demonstrated that there is unmet demand which will not be met by any planned delivery. The implementation text to support Policy SI2 sets out that the Local Plan neighbourhood policies and relevant site allocations set out where future community and health facilities are required. It encourages applicants to speak with the Council early in the application process to understand what evidence is required to support a needs based assessment for a facility.</p> <p>In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. With regard to health facilities, applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational.</p> <p>The Planning Obligations for Policy SI2 set out that contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-030	Susan Masters		Reg19-E-030/006	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														What this doesn’t do is ensure that the local health offer continues to meet the actual demands of any increases in population.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has</p>



LB Newham Response		<p>informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024).</p> <p>Additionally, Policy SI2 sets out that new, expanded and improved health facilities, will be supported where it is demonstrated that there is unmet demand which will not be met by any planned delivery. The implementation text to Policy SI2 states that the Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational. The Planning Obligations for Policy SI2 set out that contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site. The Council is satisfied that the plan remains sound without the proposed changes.</p>
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		

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-030	Susan Masters		Reg19-E-030/007	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities															<p>Given the potential shortfalls in local beds and GPs highlighted in the PA consulting report on Newham’s next ten years of population growth (commissioned by our local North East London NHS Integrated Care System), I would like to see specific ratios of health provision to proposed increase in local housing agreed. This would be along lines of what has been agreed as ideal proportions of developments to be social rent.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024).</p> <p>Additionally, Policy SI2 sets out that new, expanded and improved health facilities, will be supported where it is demonstrated that there is unmet demand which will not be met by any planned delivery. The implementation text to Policy SI2 states that the Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational. The Planning Obligations for Policy SI2 set out that contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site. 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-030	Susan Masters		Reg19-E-030/008	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														Additionally, while I welcome the on-going alliance between East London Foundation Trust and the London Borough of Newham that underpins the funding of Health and Care Space Newham, I feel that the funding of such ventures could be boosted through a request for S106 or CiL contributions to ensure new developments have the health and care facilities they need.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024).</p> <p>Additionally, Policy SI2 sets out that new, expanded and improved health facilities, will be supported where it is demonstrated that there is unmet demand which will not be met by any planned delivery. The implementation text to Policy SI2 states that the Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational. The Planning Obligations for Policy SI2 set out that contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site. The Council is satisfied that the plan remains sound without the proposed changes.</p>

Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
Reg19-E-032	Siraj Khankhara		Reg19-E-032/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											</

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-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/021	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														4.1 Policy SI2 supports the provision of new community facilities, including education facilities, subject to a number of criteria.		Comment noted
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/022	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														4.2 NewVlc’s campus is designated for education purposes on the proposals map of the Draft Local Plan and is therefore considered to be an appropriate location for new education facilities.		Comment noted
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/023a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														4.3 In order to assist in the delivery of new education facilities, we recommend that the policy is amended as follows:	<ul style="list-style-type: none"><li>• Criteria 2 [and 3]: clarification should be provided that ‘new facilities’ means the establishment of a new community facility on a new site, not new floorspace at an existing community facility. If the latter, for example, the requirement for such new facilities to be located within a town or local centre would not support new education floorspace at NewVlc, or indeed at other education establishments, such as Newham College’s Stratford Campus on Welfare Road.</li></ul>	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/023b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														[4.3 In order to assist in the delivery of new education facilities, we recommend that the policy is amended as follows:]	<ul style="list-style-type: none"><li>• Criteria [2] and 3: clarification should be provided that ‘new facilities’ means the establishment of a new community facility on a new site, not new floorspace at an existing community facility. If the latter, for example, the requirement for such new facilities to be located within a town or local centre would not support new education floorspace at NewVlc, or indeed at other education establishments, such as Newham College’s Stratford Campus on Welfare Road.</li></ul>	A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/024a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														Criteria 6 and 7: set out matters to be taken into consideration when assessing the modernisation or expansion of a community facility and we support the approach.  However, Criteria 7c [and 7i] which promote shared community use would need to have regard to safeguarding requirements and may not be deliverable at some education establishments.		A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/024b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														Criteria 6 and 7: set out matters to be taken into consideration when assessing the modernisation or expansion of a community facility and we support the approach.  However, [Criteria 7c] and 7i which promote shared community use would need to have regard to safeguarding requirements and may not be deliverable at some education establishments.		A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities and would therefore not apply to education facilities. Instead, Policy SI4: Education and childcare facilities would apply to any future application for Newham Sixth Form College. 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-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/025a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														4.4 NewVlc and Newham College have an important role in delivering education and skills to young people and adults in the Borough. Subject to the above amendments, Policies SI1 [and SI2] will facilitate investment in the combined College’s estate and enable the provision of modern, fit for purpose education facilities in line with the NPPF and London Plan policy.		Comment noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/025b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														4.4 NewVlc and Newham College have an important role in delivering education and skills to young people and adults in the Borough. Subject to the above amendments, [Policies SI1 and] SI2 will facilitate investment in the combined College’s estate and enable the provision of modern, fit for purpose education facilities in line with the NPPF and London Plan policy.		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-037	Sajid Bhad		Reg19-E-037/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members.</p> <p>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-038	Suhela Bhad		Reg19-E-038/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members.</p> <p>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>		<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.</p>



Social Infrastructure Comments to the [full Regulation 19 Representations](#)

Reg19-E-039	Uzma Khankhara		Reg19-E-039/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities															We wish to address the inflexibility of the current policy regarding the size of the facilities and we strongly advocate for an assessment of the needs to be conducted because the current policy clearly fails to reflect the dynamic requirements of our community.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.  Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.  Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.  Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetreets Local Centre. Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.  Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.  Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.  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-040	Noormohammed Polli		Reg19-E-040/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-041	Maimoona Siraj Khankhara		Reg19-E-041/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19-E-043	David Anderson		Reg19-E-043/003aa	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.3. Location and types of services within community facilities: The baseline mapping focussed on locating community facilities across the borough. To gain an overview of the types and location of services within them.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	-------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003s	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No						Yes	<p>Why I consider the Local Plan is Unsound</p> <p>The local plan is unsound because it relies on Newham’s Community Facilities Needs Assessment (Publica, 2022) as an evidence base which is not accurate. The data cannot be used to adequately justify planning policy. The evidence base was acknowledged by the authors, Publica to require further research: “To gain an overview of the types and location of services within them, the e-questionnaire asked facility managers to state which services were provided and for organisations and services to state which facilities they used. However due to the limited responses in the e-questionnaire, it did not provide enough data on the types of services being delivered within community facilities.” ( p 89, Newham’s Community Facilities Needs Assessment, Publica, 2022).</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		



Social Infrastructure Comments to the [full Regulation 19 Representations](#)

[illegible]



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003u	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No						Yes	Recognised in ( p 61, section 5.5.1, point 5, Newham Community Facilities Needs Assessment, Publica, 2022). Many churches still maintain F2 (b), Sui Generis and F1(a) class use, many need to maintain class E (f) day nursery use. Much of this was captured in the past under the old planning class of order D1. Following the significant changes to the Use Classes Order in England in The Town and Country Planning (Use Classes) Order 1987 the continued lawful use outside F1 (f) remains unclear. It would appear that actual building use is misunderstood from the baseline mapping in section 4.0 of the Newham Community Facilities Needs Assessment, p 38 – 48. It would also appear that social infrastructure is recorded as having, either a single planning classification, or that other use classes have been have been omitted. The 15 minute isochrones are therefore inaccurate and cannot provide appropriate evidence to justify planning policy. Obvious examples of this would be St Bartholomew’s Barking Road E6 3BA and St Paul’s East Ham E6 2EU which have a number of uses beyond F1 (f) use class and are both not properly recorded in the Isochrone mapping or the neighbourhood maps.		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	-----	---	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003v	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No					Yes	<p>This would mean that under the Assessment Methodology p 8, section 1.1.4, (Newham Community Facilities Needs Assessment, Publica, 2022) the following study objectives could not have been achieved and the assessment unsound:</p> <ul style="list-style-type: none"><li>Objectives 1, 3, 4, 5 &amp; 9</li></ul> <p>The following data is also incorrect:</p> <ul style="list-style-type: none"><li>Appendix B Tables and calculations on p 96, - 100</li><li>Section 4 Baseline mapping p 38 – 48 (Newham Community Facilities Needs Assessment, Publica, 2022)</li></ul>		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	-----	--	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003w	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No					Yes	<p>In addition the Facilities Audit in Newham Community Facilities Needs Assessment, Publica, 2022, site assessment in section 7.0, p 78 The sample set was not representative:</p> <ul style="list-style-type: none"><li>• A majority new build or refurbished (which is highly atypical)</li><li>• 5 of 9 included from a single community organisation</li><li>• No faith sector buildings where included (49% of all community buildings)</li></ul> <p>The Local Plan is not therefore justified by the evidence in regard to social infrastructure. Newham would need to fully accept the recommendations on p 89 of The Newham Community Facilities Needs Assessment, Publica, 2022) and undertake the studies recommended for the assessment to produce accurate policy reference information.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003x	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No						Yes	<p>The recommendations that need to be undertaken are as follows:</p> <p>8.1.2. Additional use classes: Feedback on the study highlighted certain use-class groups and/or types of facilities which could be included in the baseline mapping including residential would provide more detailed quantitative and qualitative information about the types and location of service provision in the borough in relation to community demand.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	-----	--	--



LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003y	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No						Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.5. Further information on affordability: To gain a meaningful understanding of affordability across the borough, a separate detailed investigation could be undertaken. This may cover varying aspects of affordability including:</p> <ul style="list-style-type: none"><li>• Affordability for organisations who hire space</li><li>• Affordability for facilities managers to run and maintain the space</li></ul>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	-----	--	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/003z	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							Yes	No					Yes	<p>[The recommendations that need to be undertaken are as follows:]</p> <p>8.1.6. Comparison study to other London boroughs: Through speaking to other boroughs undertaking similar studies including 15-minute neighbourhoods, the quantum, distribution and density of community facilities could be obtained. This would allow a comparison to take place to benchmark Newham and understand deficiency or proficiency of community infrastructure in relation to other London boroughs.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	-----	----	--	--	--	--	-----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		

Reg19-E-043	David Anderson		Reg19-E-043/005a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities												Yes	No											Yes	<p>Why I consider the Local Plan is Unsound</p> <p>The local plan is unsound because restrictions are being placed on the planning support criteria that are counterproductive to maintaining community charitable benefit. This relies on sustainable social infrastructure. This is at odds with the stated aim of promoting and protecting social infrastructure, it is therefore not an effective policy in this regard. The operation of church buildings would appear to be not properly understood and consequently the Local Plan in regard to these buildings cannot be justified. Only with further informed discussion could the issues be clarified and resolved. This submission will refer to christian church buildings, with which I am knowledgeable, however my submission may well apply to other faith buildings that provide more charitable social benefit than incorporated in the planning order F1 (f).</p> <p>The Local Plan could have an unintended, significant, negative impact on Social infrastructure availability in Newham</p> <p>Faith buildings overall are a very significant community resource with nearly half of all available for community use. “The study has identified 416 community facilities in the borough. 49% are places of worship with 206 locations, which represents the largest proportion of facilities by type.” (p 19 Key findings and recommendations, section 2, 2.2.1, Newham Community Facilities Needs Assessment, Publica, 2022). Any negative impact of the Local Plan on the sustainability of church buildings will significantly and negatively affect the supply and access to community infrastructure in Newham.</p> <p>The financial sustainability of churches is a pressing issue for Newham church governance, ( p 61, section 5.3.4, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). Churches are facing financial challenges of aging buildings and increasing demands on the performance of public buildings and their operation. For example, almost all will be affected by The Energy Efficiency (Private Rented Property) (England and Wales) (“MEES”) Regulations 2015. Many require alteration to meet the new MEES regulations on thermal efficiency, particularly if they generate funds though leases or lettings for charitable activity. Undertaking building adaption and updating they would be caught up in the definition within policy SI 2 as a ‘re-provision’ of their social infrastructure in line with policy definition Policy SI 2. p 165. SI 2.5 “For the purposes of this policy, re-provision can range from a simple minor extension to extensive modernisation, expansion or total rebuild of a community facility”.</p>	<p>SI2: New and re-provided community facilities and health facilities p 159</p> <p>2. New facilities <b>That are not existing social infrastructure</b> which are either, 1,000 sqm or greater Gross Internal Area, have a user appeal beyond the local neighbourhood or are anticipated to generate a large number of trips will be supported where:</p> <p>3. New facilities <b>That are not existing social infrastructure</b> which are smaller than 1,000 sqm Gross Internal Area and have a local neighbourhood user appeal can be located outside of town or local centre where:</p> <p><del>6. Re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</del></p> <p><del>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</del></p> <p><del>b. there are no unacceptable transport and highways impacts; and</del></p> <p><del>c. it can be demonstrated that the scheme has been designed to be neighbourly; and</del></p> <p>7. Proposals for all new and re-provided (including modernisation and/or expansion) facilities that receive <b>government or local government capital funding</b> should:</p> <p>a. provide a Social Value-Health Impact Assessment (see Local Plan Policy BFN3); and</p> <p>b. demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space; and</p> <p>c. make efficient and effective use of land, maximising the opportunities for shared use of facilities; and</p> <p>d. ensure the Gross Internal Area,– facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</p> <p>e. be visible and welcoming from the street and be designed to facilitate social</p> <p>f. be inclusive and accessible; and</p> <p>g. be designed with flexibility in mind, to allow the building to adapt to different users of the space over time; and</p> <p>h. demonstrate how environmental conditions and air quality have influenced the position of the facility on the site and its design. This is especially important for facilities which are intended for children or other vulnerable users; and</p> <p>i. maximise availability of their provision to the community, including during the evening and at weekends; and</p> <p>j. if it is a large-scale development, and where possible for smaller-scale facilities, <b>and government or local government revenue funded</b> provide free, publicly available provision of accessible toilets, baby change, Wi-Fi and drinking water facilities; and</p> <p>k. demonstrate that the scheme has been designed to be neighbourly.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
-------------	----------------	--	------------------	-----------------------	--	--	--	--	--	--	--	--	--	--	--	--	-----	----	--	--	--	--	--	--	--	--	--	--	-----	--	---	--

LB Newham Response		
Proposed modifications and explanation		8. Proposals for social infrastructure facilities <b>that are government or local government capital and revenue funded</b> will usually be: a. secured for the specific intended use of the facility; and b. required to enter into a Community Use Agreement with the Council.
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		

Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																			
Reg19-E-043	David Anderson		Reg19-E-043/005b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities												Yes	No	
																	Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The stated aim of the Local Plan toward churches is effectively undermined by the policy provisions in Policy Si 1 and SI 2</p> <p>The planning intention of the policies is stated as “to protect and promote social infrastructure, both those in public and private ownership, to meet the needs of Newham’s growing population”. (p 153 clause 3.122) The continued availability of Church buildings is therefore stated as a Local plan policy priority. Many Churches provided community hall and other services when not needed for faith events. During the Victorian era church halls were built to accommodate faith activity and community activity in separate buildings. This division is sometimes still maintained where the church building has historic value (listed) which also make adaptations difficult and costly. A large number of Newham churches have been repaired or rebuilt following bombing damage during 1939-45. This has led in recent decades to a different path to sustainable operation for the majority of Newham churches. Non listed buildings have no recourse to historic preservation funds. In order to remain sustainable or to further their charitable social wellbeing mission, Newham Churches have evolved their operation over many decades. Some have purely faith practice use planning class F1 (f) indeed many have multiple congregations using a variety of spoken language ( p 61, section 5.5.1, point 1, Newham Community Facilities Needs Assessment, Publica, 2022). None however could now serve, or seek to serve a 15 minute neighbourhood exclusively.</p> <p>This is recognised in ( p 61, section 5.5.1, point 5, Newham Community Facilities Needs Assessment, Publica, 2022). Many churches still maintain F2 (b), Sui Generis and F1(a)class use, many need to maintain class E (f) day nursery use. Much of this was captured in the past under the old planning class of order D1. Following the significant changes to the Use Classes Order in England in The Town and Country Planning (Use Classes) Order 1987 the continued lawful use outside F1 (f) remains unclear. To clarify this anomaly ought be within the remit of Newhams Local plan, however the consequence to the operation of a majority of churches in Newham could be catastrophic with many forced to curtail or cease their charitable work and benefit to Newham residents. If one looks at any of the baseline mapping in section 4.0 of the Newham Community Facilities Needs Assessment, p 38 – 48. It would appear that Social infrastructure is recorded as having, either a single planning classification, or that existing use classes have been have been omitted. The 15 minute isochrones are therefore inaccurate and cannot provide appropriate evidence to justify planning policy. A separate submission relates to the short comings of the assessment data.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</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>and local need for the proposed facility.</p> <p>Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-043	David Anderson		Reg19-E-043/005d	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Leaving aside historic (listed) churches that cannot be rebuilt or re-provided in a new location. The relocation of churches is problematic for the following reasons:</p> <ul style="list-style-type: none"><li>• Throughout the development of Newham neighbourhoods Churches have provided community services such as funerals and weddings which are incompatible with commerce and traffic in local centres.</li><li>• The demand and cost of leases or land on high streets and local centres are beyond the majority of charities.</li><li>• The substantial cost benefit of relocation.</li></ul> <p>It would clearly be more cost effective to provide public transport to social infrastructure where it is currently located. Public transport does not as yet provide effective provision in the East section of the East Ham Neighbourhood, TPAL is at 1a or 1b, (p 14 of the Newham Sustainable Transport Strategy Figure 11 ‘Public Transport Accessibility Levels’) This is the subject of a separate submission on the Transport policy T2.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>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-043	David Anderson		Reg19-E-043/005e	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The Local Plan introduces additional requirements and burdens on church governance, capital works and charitable programmes that have no recourse to public funds, further eroding the viability of some social infrastructure buildings.</p> <p>Charitable social infrastructure building governance may also face provisions in Policy SI 1 that facilities should not be “reconfigured, reduced in size or relocated’ unless the needs of current or future users are met. This provides difficulties in the following ways:</p> <p>Governance is directed by charity trustees funded by charitable gifts of time and donations. Governance might be negatively affected by the policy. It would be easy under Policy SI 1 for a group of community users to argue their right to use social infrastructure for a community purpose is protected even though the use is judged unsustainable or uneconomic by the charity trustees of a building. Users are given rights both on Infrastructure provision for an ‘availability’ test for ‘times they wish to use the space’ and ‘affordability’ test in SI 1.1 p156. This bears no reference to the true cost of providing charitable facilities and service providers have no regular recourse to public funding. Of over 40,000 churches in the UK “ none gets guaranteed government funding. All rely on Charity” ( p 4, The House of Good, The economic and social value of church buildings in the UK, National Churches Trust, 2020).</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1 is intended to protect the users of existing community facilities, such as churches. However, as set out in SI1.1, community facilities can be lost to other uses, reconfigured, reduced in size or relocated if it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Provided it could be demonstrated that the criteria met, development of an existing church could offer a different type of community facility to that provided on-site currently.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-043	David Anderson		Reg19-E-043/005f	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Policy SI 1 p154 provides for existing churches facing unsustainable financial use would need to:</p> <ul style="list-style-type: none"><li>• be actively marketed for the use within the local 15 minute neighbourhood (clause 1b ii.) It is highly unlikely that a church required to serve mostly people living mostly in its neighbourhood would be marketable. ( 67% in the previous Newham Local plan ).</li></ul>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1 is intended to protect the users of existing community facilities, such as churches. However, as set out in SI1.1, it is possible for community facilities to be lost to other uses, reconfigured, reduced in size or relocated if it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Depending on the proposal this could mean that a community facility, such as a church, would need to be actively marketed for social infrastructure use, not necessarily a church, for at least 12 months. This is type of protection, towards existing community facility uses, is a recognised policy approach in Local Plans and is in accordance with the requirements of the NPPF (2023, para.97) and London Plan (Policy S1) (2021). 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-043	David Anderson		Reg19-E-043/005g	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>The policy as drafted would also require an existing church building wanting to improve and modernise its building to be more sustainable to be further constrained in disposal of uneconomic parts of their site by purchasers:</p> <ul style="list-style-type: none"><li>• Only appealing to a local neighbourhood if located outside a town centre (section 3 p 159).</li><li>• The facility being easily accessible by public transport (section 3 p 159)</li><li>• Newham’s own plans to deliver new community infrastructure potentially without regard to the existing charity or its beneficiaries.</li></ul> <p>The Local Plan should have a requirement for effective existing charitable Social Infrastructure to be properly included in stakeholder consultation</p> <p>As a church facilities manager I am unaware of any church building in Newham that only appeals to a local neighbourhood. (p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022). If congregations where largely restricted to local neighbourhood populations and membership most would eventually close and be lost as community infrastructure in direct contravention of policy SI 1.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <p>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly;</p> <p>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-043	David Anderson		Reg19-E-043/005h	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Yes	No						Yes	<p>[Why I consider the Local Plan is Unsound]</p> <p>Policy Map reference N13.SA3 p 563 para 4 indicates a new community facility is needed. This policy could enforce a right to provide publicly funded community facilities in direct competition to an existing charitably funded facilities neighbouring the site. The church has provided both faith worship and community services in order to deliver sustainable community value and benefit. There has been no direct communication between Newham or the housing developer and St Paul's Church which is next to site N13.SA3. The plans have been progressed without discussion or consultation despite attempts to initiate communication, despite recommendations in ( p 24, section 2.3.4, Newham Community Facilities Needs Assessment, Publica, 2022). This makes the proposals in the Local plan p 161 – 164 unjustified as the proposals cannot have taken into consideration the impact on St Pauls as a community infrastructure stakeholder and provider.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as any future application for a new facility in the neighbourhood would need to meet Policy SI2.1.c. The implementation text for this clause sets out that applicants should speak with the council early in the application process to understand what evidence is required to support a needs based assessment for a facility. A needs-based assessment is likely to require evidence of the following:</p> <ul style="list-style-type: none"><li>• an up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. Each facility location should have its 15 minute walking radius mapped (using isochrones with additional analysis to consider a detailed understanding of the actual walking and wheeling conditions for a range of different users).</li><li>• applicants for a community facility proposal should consult Newham's Community Facilities Needs Assessment (2022) to ascertain the current provision of community facilities in the borough and whether or not the site is in an area of deficit. A proposals neighbourhood will depend on the type of service it is offering. Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. The mapping in the Community Facilities Needs Assessment (2022) takes into account the street network and pedestrian barriers to identify parts of the borough that are further than a 15 minute walk to community facilities.</li><li>• recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</li></ul> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																						
Reg19-E-047	Bilal Mir		Reg19-E-047/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities		Evidence				No	No						No		<p>2. Need for Policy Flexibility We are concerned about the current policy’s rigidity concerning facility sizes. The existing policy does not fully reflect the evolving needs of our community. We strongly recommend conducting a thorough needs assessment to gain a clear understanding of both present and future requirements. This assessment should guide necessary policy adjustments to ensure that the facilities we plan will effectively meet our community’s needs and adapt to future demands.</p> <p>[originally against Policy N7 SA1 - taking forward as SI2 and CFNA evidence]</p>	<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 applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.</p> <p>Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-053	Mohmed Jeeva		Reg19-E-053/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-054	Mohsin Ikbal		Reg19-E-054/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-055	Mehboob Toliya		Reg19-E-055/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-056	Atik Vahora		Reg19-E-056/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of individuals with disabilities and the elderly. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-057	Seemaben Vahora		Reg19-E-057/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-058	Samiullah Moosa		Reg19-E-058/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-076	Mohammedmusab		Reg19-E-076/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-077	Nayeem Gani		Reg19-E-077/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							New Ham Council Plan is not appropriate and it is affecting one community. As this council has a diverse community they have to understand all community.		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																			
Reg19-E-085	Omarji Ahmed		Reg19-E-085/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						<p>The Local Plan proposed by the London Borough of Newham does not adequately address the pressing needs of the local community, particularly with regard to religious and communal infrastructure. Below are the reasons why I believe the Local Plan is unsound and may not comply with the duty to co-operate:</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"> <li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li> <li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li> <li>• be inclusive and accessible.</li> </ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</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>

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-085	Omarji Ahmed		Reg19-E-085/05	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<b>4. Lack of Diverse Infrastructure in a Diverse Borough</b> Newham prides itself on being a borough that celebrates and supports diversity. However, this commitment is not reflected in the Local Plan's approach to community infrastructure. The Local Plan does not sufficiently consider the diverse religious and cultural needs of the residents, making it unrepresentative of the borough's values. This lack of incorporation undermines the soundness of the plan, as it does not meet the local community's demand for adequate religious and social facilities. <b>[originally against SI1, SI2 and SI3 - taking forward SI2]</b>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-085	Omarji Ahmed		Reg19-E-085/07	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							In light of the above points, I believe the Local Plan is unsound as it does not adequately reflect the needs and demands of the local community, particularly with regard to religious infrastructure. Additionally, it fails to incorporate the diverse infrastructure required to support Newham's multicultural population, and it does not comply with the duty to co-operate as per the requirements of the planning process. I urge the Council to reconsider its approach and engage more deeply with local community groups to ensure the Local Plan is more representative, equitable, and inclusive. [originally against SI1, SI2 and SI3 - taking forward SI2]	In order to make the Local Plan legally compliant and sound, I propose the following modifications: 1. Collaboration with Stakeholders o Proposed Modification: The Local Plan should explicitly require collaboration between the Council, landowners, and the local community to ensure that any proposed replacement facility is appropriately sized and tailored to meet the actual needs of the community. This should be done through a formalized engagement process, including workshops and consultations with key stakeholders. Conclusion: In summary, these modifications would ensure that the Local Plan is legally compliant and sound by addressing the actual needs of the community, optimizing land use, promoting inclusivity, and contributing to local economic growth. These changes will also ensure that the plan aligns with the values of diversity and sustainability that Newham prides itself on. o Reasoning: Engaging in meaningful collaboration ensures that the final development reflects the needs of the community and benefits all parties involved. This will address the community's growing demands while aligning with the Council's long-term objectives for sustainable development and inclusivity.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as 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>With regard to future applications for new religious meeting places in the borough, clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires applicants to demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space and provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>



Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																					
Reg19-E-085	Omarji Ahmed		Reg19-E-085/08	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>In light of the above points, I believe the Local Plan is unsound as it does not adequately reflect the needs and demands of the local community, particularly with regard to religious infrastructure. Additionally, it fails to incorporate the diverse infrastructure required to support Newham's multicultural population, and it does not comply with the duty to co-operate as per the requirements of the planning process. I urge the Council to reconsider its approach and engage more deeply with local community groups to ensure the Local Plan is more representative, equitable, and inclusive.  [originally against SI1, SI2 and SI3 - taking forward SI2]</p>	<p>2. Needs Assessment for Facilities</p> <p>o Proposed Modification: A policy should be added to the Local Plan requiring a comprehensive needs assessment to be conducted prior to determining the size and scope of any new community or religious facility. This assessment should take into account the demographic trends, current facility use, and future needs of the local population, particularly underrepresented groups such as women, children, and the elderly.</p> <p>o Reasoning: A needs assessment will ensure that any replacement facility is appropriately scaled and fit for purpose. The current policy's one-size-fits-all approach does not account for the dynamic needs of the community. Conducting a needs assessment will ensure that the Local Plan is sound by ensuring it meets the real and evolving needs of the population.</p> <p>Conclusion: In summary, these modifications would ensure that the Local Plan is legally compliant and sound by addressing the actual needs of the community, optimizing land use, promoting inclusivity, and contributing to local economic growth. These changes will also ensure that the plan aligns with the values of diversity and sustainability that Newham prides itself on.</p>	<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 applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.</p> <p>Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-085	Omarji Ahmed		Reg19-E-085/09	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							In light of the above points, I believe the Local Plan is unsound as it does not adequately reflect the needs and demands of the local community, particularly with regard to religious infrastructure. Additionally, it fails to incorporate the diverse infrastructure required to support Newham's multicultural population, and it does not comply with the duty to co-operate as per the requirements of the planning process. I urge the Council to reconsider its approach and engage more deeply with local community groups to ensure the Local Plan is more representative, equitable, and inclusive. [originally against SI1, SI2 and SI3 - taking forward SI2]	3. Facilities for Disabled and Elderly Members of the Community o Proposed Modification: The Local Plan should include a specific provision for the construction of purpose-built facilities for disabled individuals and socially isolated elderly members of the community. This could include dedicated spaces for community activities, accessible worship areas, and communal gathering spaces. o Reasoning: There is a growing demand for infrastructure that addresses the needs of the elderly and disabled within the community. The current proposal does not adequately reflect this, rendering the plan incomplete and unsound. Modifying the plan to include such provisions would ensure that all members of the community, regardless of physical ability, are supported. Conclusion: In summary, these modifications would ensure that the Local Plan is legally compliant and sound by addressing the actual needs of the community, optimizing land use, promoting inclusivity, and contributing to local economic growth. These changes will also ensure that the plan aligns with the values of diversity and sustainability that Newham prides itself on.	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/08	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	Many of the current faith faculties utilise by the Newham stakeholders to conduct social wellbeing community safe place of meeting. As the local authority does not have adequate facilities to accommodate large congregation free of charge for community social event purpose. <b>[originally against N7 SA1 - proposed modifications- taking forward SI2]</b>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-087	Talhah Khapee		Reg19-E-087/07	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities							No						No	<p>Inclusive and Accessible Facilities: The plan must commit to developing purposebuilt, accessible facilities for people with disabilities, fostering greater social inclusion, especially for the elderly who may be socially isolated. Additionally, the plan should recognise the growing needs of diverse communities by providing larger, multifunctional spaces for both worship and social activities.</p> <p>...By adopting these revisions, the Local Plan will achieve legal compliance and soundness, ensuring it addresses community needs while promoting long-term growth and sustainability within the borough.<span style="color: red;">[originally against changes to make legally compliant - taking SI2]</span></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-090	Huzaifa Khankhara		Reg19-E-090/05	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3 - taking forward SI2]</b>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-097	Latif Patel		Reg19-E-097/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The current Local Plan is not in compliance with legal requirements and does not fulfill the obligation to collaborate effectively. This is largely due to its insufficient provisions for community facilities, which overlook the urgent needs of our diverse population.</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-097	Latif Patel		Reg19-E-097/04	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>In a borough as diverse as Newham, it is crucial for our Local Plan to include infrastructure that acknowledges and supports this diversity. Failing to do so risks not only legal compliance but also neglects the essential needs of the community it is designed to serve.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Local Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-098	Nafees Khojji		Reg19-E-098/02	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward SI2]</b>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-109	Fatima Anika Akhtar		Reg19-E-109/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward SI2]</b>	To make the Local Plan legally compliant and sound, the following modifications are necessary: Inclusive and Accessible Facilities: The plan must include a commitment to purpose- built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-110	Yunusbhai Patel		Reg19-E-110/02	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No							No	Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward SI2]</b>	To make the Local Plan legally compliant and sound, the following modifications are necessary: Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-111	Sadiq Bhata		Reg19-E-111/01a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <a href="#">[originally against N7.SA1 Policies Map - taking forward SI2]</a></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-117	Sajid Bhai Vahora		Reg19-E-117/01b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities. <b>[originally against N7.SA1 Policies Map - taking forward SI2]</b></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-119	MD Shaiful Azam		Reg19-E-119/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against N7.SA1 Policies Map - taking forward SI2]</b></p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p><b>Inclusive and Accessible Facilities:</b> The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/02	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3 - taking forward SI2]</b></p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-128	Atik Shaikh		Reg19-E-128/03	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3 - taking forward SI2]</b>	To make the Local Plan legally compliant and sound, the following modifications are necessary: Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-131	Mohammadakib Bohara		Reg19-E-131/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-134	Mahamadvasim Vahora		Reg19-E-134/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more.</p> <p>[originally put against Policy N7 SA1 - taken forward as Policy SI2]</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-134	Mahamadvasim Vahora		Reg19-E-134/001b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.</p> <p>[originally put against Policy N7 SA1 - taken forward as Policy SI2]</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element). Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-135	Faizan Vahora		Reg19-E-135/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-138	Samir Vahora		Reg19-E-138/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more.</p> <p>[originally put against Policy N7 SA1 - taken forward as Policy SI2]</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19-E-147	Abdul Rahim Mohamed	Reg19-E-147/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No					No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <b>[originally against N7.SA1 - taking forward SI2]</b></p>	<p>Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.</p>	<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 applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.</p> <p>Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetreets Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2. Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Regarding the type of facility provided needing to meet the needs of women, Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users;</li></ul>
-------------	---------------------	----------------	-----------------------	--	--	--	--	--	--	----	----	--	--	--	--	----	--	--	---

LB Newham Response	<p>and</p> <ul style="list-style-type: none"><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>Regarding an education use, site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidence through Newham's Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element). Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
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	

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-151	MD Masud Rana Bhuiyan		Reg19-E-151/04	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities. <b>[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward SI2]</b></p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

LB Newham Response																		Proposed modifications and explanation	
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
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/13	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	There had been extensive policy proposals by external stakeholders and faith partners conducted in 2015 by the university in conjunction with RTPI to ensure that planning challenges faced by the faith community should be part of town centre planning proposals recommended by RTPI to town centre planners to adopt with care and due diligence. [originally against SI1, SI2 and SI3, N7.SA1 - taking forward SI2]



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-158	Ibrahim Khankhara		Reg19-E-158/02	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	Newham is a borough that prides itself on its diversity, yet the upcoming draft proposal fails to incorporate the necessary infrastructure to reflect this reality. The absence of proper provisions for spaces like ours reflects a broader issue: the need for more inclusive, future-focused planning that ensures all faith groups are given adequate room to thrive. It is not enough to merely recognize diversity; the borough must take active steps to support it through thoughtful, inclusive development. [originally against SI1, SI2 and SI3, N7.SA1 - taking forward SI2]	There is also a critical lack of purpose-built facilities for individuals with disabilities. These spaces would be invaluable in helping the socially isolated, especially the elderly, connect with others and participate more fully in community life. The current draft proposal fails to capitalize on the full potential of the site, particularly in terms of providing much-needed housing and expanding community facilities. In contrast, other parts of London and areas outside the London Borough of Newham (LBN) have successfully used similar sites to meet the long-term needs of their communities. Privately-owned land has been strategically acquired in many of these cases, setting a precedent for more forward-thinking development.	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-163	Mohmmadhhaifil Imtiaz		Reg19-E-163/001	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members.</p> <p>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-175	Ibrahim Waza		Reg19-E-175/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	[... states Local plan is flawed] primarily due to its insufficient allocation for community facilities that fail to address the everyday needs of our diverse population. The existing infrastructure is grossly inadequate, lacking enough space to accommodate all worshippers, particularly women and children, which hinders participation and inclusivity in our community.	To guarantee that the Local Plan is legally compliant and effective, essential modifications are required, particularly concerning the insufficient existing facilities that do not address the diverse and evolving needs of our community.	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-185	Hadley Property Group	Deloitte	Reg19-E-185/014a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities			SI2.4											Community facilities Policy SI2: New and re-provided community facilities Hadley is encouraged by the support for new community facilities over 1,000sqm GIA in town centre locations.		Support noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/014b	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities			SI2.4											Hadley objects to paragraph 4 of the proposed policy which states that speculative social infrastructure development will not be supported and requests flexibility as the local community grows with the large growth of development in the area.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

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-187	Aamina Hafeji		Reg19-E-187/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	[..states Local Plan is flawed] largely due to its inadequate provision for community facilities that do not meet the day-to-day requirements of our diverse population. The existing structures are woefully insufficient, lacking the necessary space to cater to all worshippers, especially women and children, which directly hampers participation and inclusivity within our community.		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-193	Hajra Hafeji		Reg19-E-193/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	[..states Local Plan is flawed] largely due to its inadequate provision for community facilities that do not meet the day-to-day requirements of our diverse population. The existing structures are woefully insufficient, lacking the necessary space to cater to all worshippers, especially women and children, which directly hampers participation and inclusivity within our community.		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-195	St William Homes LLP	Quod	Reg19-E-195/037	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														6 Social infrastructure Policy SI2: New and re-provided community facilities and healthcare facilities 6.1 St William acknowledges the role of community and health facilities in supporting new neighbourhoods. Planning for new facilities is complex and town centre sites will not always be the most appropriate location to meet community demands. St William therefore does not support the requirement for a sequential test for new community facilities and would welcome greater clarity in the policy wording to ensure it is clear that the sequential test is only triggered as required under the National Planning Policy Framework and that there is no wider remit for the sequential test in connection with community facilities.	[Appendix 12: General Policies – Suggested amendments] <del>Only if suitable sites in the town centre, local centre or edge of centre locations are not available (or are not expected to become available within a reasonable period) should out of centre sites be considered.</del>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 is intended to ensure convenient access to community and health facilities, as this allows a range of people to easily use the services they need. This means that it may be acceptable for some smaller facilities and those with a local user base to be located outside of a designated Town or Local Centre. In these cases, the users of the facility should be able to easily access the facility by foot or sustainable transport methods.</p> <p>Clause 3 of Policy SI2 allows a greater flexibility, than the adopted Local Plan (2018), with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA). This makes it easier for small scale social infrastructure to locate outside of a Town or Local Centre.</p> <p>A new facility which is smaller than 1,000 sqm Gross Internal Area and have a local neighbourhood user appeal can be located outside of town or local centre where:</p> <p>a. the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility; and</p> <p>b. there are no unacceptable transport and highways impacts; and</p> <p>c. it can be demonstrated that the scheme has been designed to be neighbourly; and</p> <p>d. it is located in a:</p> <p>i. Neighbourhood Parade; or</p> <p>ii. next to a park or school; or</p> <p>iii. in an area of identified community facility deficit;</p> <p>Only if it is not located in one of the above three specified out-of-centre locations will it be required to undertake a sequential test, to demonstrate that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period.</p> <p>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-198	Siraj Hafeji		Reg19-E-198/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	[..states Local Plan is flawed] This is largely due to its insufficient provisions for community facilities, which overlook the urgent needs of our diverse population. The existing resources do not adequately meet the daily needs of our community, especially for women and children, thereby limiting participation and inclusivity.	To enhance the legal compliance and soundness of the Local Plan, it is essential to modify it to prioritize the actual needs of our diverse community, particularly regarding the provision of adequate worship facilities. The current inadequacies of our existing facilities, which hinder participation, inclusivity, and effective service delivery, demonstrate a clear disconnect between the Plan's proposals and community requirements.	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-201	Shakeel Ismail		Reg19-E-201/002	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No							<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against Policy SI2]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/043	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities														The principle of this policy is largely supported. Especially Part 1 of the policy which confirms that the delivery of new community facilities on identified site allocations should be based on need. It is considered that the requirement for a “needs based assessment” should only relate to community facility uses for which it is possible to establish a ‘need’, such as school and healthcare places. Many community facilities do not attract a need in a quantifiable sense.		<p>Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as we would contend that it is possible to guage the need for a community facility and not just the need for schools and health facilities.</p> <p>The baseline mapping in the Community Facilities Needs Assessment (2022) sets out the community facilities in a given Newham neighbourhood. The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</p> <p>Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-208	Aman Ullah		Reg19-E-208/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need		A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is applied in the round. The development principles section of the site allocation direct the reader to Local Plan

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
																			for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <span>[originally against N7.SA1 Policies Map - taking forward SI2]</span>		<p>Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-209	Noreena Bibi		Reg19-E-209/001	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <a href="#">[originally against N7.SA1 Policies Map - taking forward SI2]</a></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-210	Nirala Jan		Reg19-E-210/001a	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <a href="#">[originally against N7.SA1 Policies Map - taking forward SI2]</a></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-211	Muhammad Haroon		Reg19-E-211/001	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <a href="#">[originally against N7.SA1 Policies Map - taking forward SI2]</a></p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-212	Muhammad Umar		Reg19-E-212/001	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The faith community is diverse, with varying needs and characteristics; however, there are currently no facilities available for women to fulfill their spiritual needs due to the limited land and facilities in Newham that cater to Muslim requirements. There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members. The facility would allow for much more. <b>[originally against N7.SA1 Policies Map - taking forward SI2]</b></p>		<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-213	Committee of the British Stunt Register		Reg19-E-213/001	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						Blank	Blank						Blank	<p>Re: Save East London Gymnastics</p> <p>On behalf of the British Stunt Register (BSR) we are writing in our support of East London Gymnastics Club, and to appeal against its closing down.</p> <p>The BSR is the world’s leading stunt association, with a membership of over 450 professional stunt performers and coordinators working on screen productions at the highest level of the world industry, from major Hollywood blockbusters to Emmy award winning television series.</p> <p>One of the qualifications used to apply for the BSR is gymnastics because it is such an essential physical skill that translates into our work as stunt performers in so many ways.</p> <p>East London Gymnastics has been, and continues to be, an integral part of so many BSR member’s vital training. It has seen countless members through their training for the BSR Gymnastics Test, which is also hosted there, and it is a crucial training space for qualified members who continue their training to become more accomplished performers, upskilling their gymnastics, tricking, trampolining and more. The centre is the root that allows them to step onto the biggest film sets in the world and deliver astonishing action for the masses and keep themselves safe whilst doing it with the skills and conditioning born of that training.</p> <p>The global film industry is booming, nowhere more so than in the UK. with the expansion of film studios across the country to accommodate all the productions due to film here. We need the talent pool to provide stunt performers for these productions; shows from the Marvel cinematic universe, Game of Thrones and Star Wars to name but a few. Much of that talent today was forged at the East London Gymnastics, and if it were to close much of that future talent that could be waiting to emerge and continue to wow audiences on screen might be lost.</p> <p>We hope you will hear our please and move to preserve this fantastic centre, and the lives and careers it shapes.</p>		Comment noted. A change to this policy approach has not been made. We did not consider this change to be necessary as the neighbourhood profile for N11: Beckton, highlights the gymnastics club as one of the areas community facilities. The gymnastic centre forms part of site allocation N11.SA1 East Beckton Town Centre, and it is included in the allocation's 'Existing Uses'. The 'Development principles' for this site state that: 'Development should protect and enhance existing sports and recreation facilities in accordance with Local Plan Policy SI1 and SI3'. The Council is satisfied that the plan remains sound.



Social Infrastructure Comments to the <a href="#">full Regulation 19 Representations</a>																			
Reg19-E-237	Abdullah Waza		Reg19-E-237/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No					No	<p>The current Local Plan is fundamentally flawed and does not fulfill the duty to cooperate, primarily due to its insufficient allocation for community facilities that fail to address the everyday needs of our diverse population...</p> <p>...It is essential that the Local Plan is revised to effectively address these deficiencies, creating an environment in which all community members can thrive and have their concerns acknowledged and addressed. Therefore, I strongly urge you to consider the landowner's proposal, which prioritizes the welfare of the community.</p>	<p>To guarantee that the Local Plan is legally compliant and effective, essential modifications are required, particularly concerning the insufficient existing facilities that do not address the diverse and evolving needs of our community.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as 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>We did not consider this change to N7.SA1 be necessary as the Local Plan is applied in the round. The development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetreets Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for</p>

Proposed modifications and explanation	LB Newham Response	the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.  The Council is satisfied that the plan remains sound without the proposed changes.
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		

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-242	Faaiza Hafeji		Reg19-E-242/01	Social Infrastructure	SI2 New and re-provided community facilities and Health facilities						No	No						No	<p>The current Local Plan is not in compliance with legal requirements and does not fulfill the obligation to collaborate effectively. This is largely due to its insufficient provisions for community facilities, which overlook the urgent needs of our diverse population. The existing resources do not adequately meet the daily needs of our community, especially for women and children, thereby limiting participation and inclusivity.</p>		<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-C-017	Tom Clarke MRTPI		Reg19-C-017/002	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities						Yes	No						Yes	We welcome and support this policy and the support and protection it affords to cultural facilities within the borough, although without the amendment suggested to Policy SI1 1.a there is a risk of facilities being unnecessarily lost which would be in conflict with paragraph 97 of the NPPF (2023).	<del>Removal of part iii. of Policy SI1 1.a.</del>	<p>Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1. The policy protects existing community facilities and health facilities, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Only if the loss of a facility can be demonstrated as being acceptable then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location). This approach is therefore considered to be effective and in conformity with the NPPF and the London Plan.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-C-023	Bob Sharples		Reg19-C-023/004	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities						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 171 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
Reg19-C-041	Ibrahim Luqman Patel		Reg19-C-041/001a	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					Yes	No						No	I want religious facilities for the youth		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-C-043	fazlurrahman mohammed		Reg19-C-043/002b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities						No	No						No	<p>Lack of Inclusive Infrastructure: While Newham prides itself on diversity, the draft plan fails to provide the necessary infrastructure to support its diverse population. There is a lack of inclusive infrastructure designed to meet the specific needs of underrepresented groups, including the elderly, women, children, and those with disabilities.</p>	<p>[To make the Local Plan legally compliant and sound, the following modifications are necessary:] [...] Inclusive and Accessible Facilities: The plan must include a commitment to purpose-built facilities for individuals with disabilities. These spaces would foster social inclusion, particularly for the elderly population, many of whom are socially isolated. Additionally, the plan must reflect the evolving needs of diverse communities, such as larger community spaces that can host both worship and social activities.</p> <p>[...] [By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.]</p>	<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 applied in the round. The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-C-051	Idris Patel		Reg19-C-051/001b	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities						No	No						No	<p>we as muslim need a purpose built mosque in our area . in newham we do not have any purpose built mosque or centre where Muslims can go and do our worship and pray there. other boroughs in London have many purpose built mosques and centres where the community can get together for prayer and worshipping and also for community gathering.</p>		<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-171	Lee Valley Regional Park Authority		Reg19-E-171/020	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities		3.139				Yes	Yes							<p>Policy SI3 and Lee Valley VeloPark</p> <p>A new reference to the Queen Elizabeth Olympic Park and the Lee Valley VeloPark has been added to the Justification text for Policy SI3 Cultural Facilities, Sport and Recreation, as set under paragraph 3.139. As explained in Newham’s ‘Regulation 18 Consultation report’ this additional text clarifies the intent of policy and provides Newham specific detail on the Queen Elizabeth Olympic Park, associated leisure facilities including the VeloPark and makes reference to the Lee Valley Regional Park Authority. Policy SI3, Cultural Facilities and Sport and Recreation is intended to protect and support the growth and diversification of cultural and leisure facilities. Any new and reconfigured culture, sport and recreation facilities will be expected to meet the criteria set out in Local Plan Policy SI2 New and re-provided community facilities and health facilities.</p> <p>The Authority supports this addition to the Justification text as it provides support for the Lee Valley VeloPark and indicates Newham’s support for the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability. This statement also mirrors the supporting text within the LLDC Local Plan which recognises the world class status of the sports facilities at the Lee Valley VeloPark and its importance as a national leisure and sporting venue hosting local, national and international events, together with its role in delivering a sporting legacy for local communities. One small amendment is needed to change ‘its’ leisure trust to ‘a’ leisure trust and this is corrected below in blue font.</p>	<p>Justification</p> <p>3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a <del>its</del> leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability.</p>	<p>Comment noted. This comment has been subject to further discussion with Lee Valley Regional Park Authority and is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan is clear and therefore has made the following wording change which is included in the modification table:</p> <p>3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a <del>its</del> leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability. <b>The Regional Park’s offer for Newham’s communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.</b></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-171	Lee Valley Regional Park Authority		Reg19-E-171/21	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities		3.139				Yes	Yes							It is still considered relevant that the Justification text under paragraph 3.139 should also reference the wider offer that the Regional Park provides to Newham’s communities. In particular the Regional Park offers a range of walking and cycling routes through to adjoining areas and venues to the north, and the opportunity for people to enjoy venues such as Lee Valley Hockey and Tennis Centre, (approx. 30mins on public transport and 20mins cycle ride from Canning Town), the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre, (approx. 15mins cycle ride and 35 mins by public transport from the centre of the QEOP), one of only three Olympic-sized twin rinks in the UK. This additional text could follow at the end of the paragraph 3.139 as shown below.	Justification <b>The Regional Park’s offer for Newham’s communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.</b>	Comment noted. This comment has been subject to further discussion with Lee Valley Regional Park Authority and 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 reflects the qualities of the green spaces in the Lee Valley Regional Park and therefore has made the following wording change which is included in the modification table:  3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a <del>its</del> leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability. <b>The Regional Park’s offer for Newham’s communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.</b>
Reg19-E-191	University College London	Deloitte	Reg19-E-191/008	Social Infrastructure	SI3 Cultural facilities and spot and recreation facilities														UCL recognises the importance of cultural facilities and sport and recreation facilities, including the role these play in promoting diversity, inclusive participation and wellbeing. UCL therefore supports the support for and protection of such facilities in draft Policy S13.  UCL has an aspiration to develop increased sporting facility provision and would be interested in working with any potential opportunities to support development of this nature near to the UCL East campus.		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-007/004a	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	I would also argue that our current Pupil referral Unit schools in Plaistow Tunmarsh school is failing the children’s right to an education, this school does not have a playground. This school, covered with asbestos is an amalgamation of pre fabs where shipping containers are used as offices and spaces for learning. I would suggest these are the most vulnerable and failed outcast children in society, and the plan does not have any new state of the art provision for them.	[...]. Create a state of the art alternative provision school, we lack educational facilities that are in good condition for children with emotional and behavioural issues, as we know there is an absolute escalation of children with special needs, namely autism.	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 provision of education facilities through Policy SI4: Education and childcare facilities. This policy approach is justified by up to date evidence, through Newham's Places for All Strategy (2022, 2024) and through designations on relevant site allocations. The Local Plan cannot deliver the change you have requested regarding the condition of existing facilities. The Council’s Education Team is best placed to engage with you regarding Flanders Field. Your comment has been passed onto Newham’s Education Team. The Council is satisfied that the plan remains sound without the proposed change.
Reg19-C-023	Bob Sharples		Reg19-C-023/005	Social Infrastructure	SI4 Education and childcare facilities						Yes	Yes						Yes	Sport England is supportive of this policy and is pleased to that community use of the schools and higher educational facilities is encouraged outside core school hours. We are also pleased to see that both our design guidance and Active Design is referenced on page 178.		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-037	Sajid Bhad		Reg19-E-037/001b	Social Infrastructure	SI4 Education and childcare facilities														Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI4]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-038	Suhela Bhad		Reg19-E-038/001b	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI4]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-111	Sadiq Bhata		Reg19-E-111/01b	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally against N7.SA1 Policies Map - taking forward SI4]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-138	Samir Vahora		Reg19-E-138/001b	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	<p>Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.</p> <p>[originally put against Policy N7 SA1 - taken forward as Policy SI4]</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-163	Mohmmadhhaifil Imtiaz		Reg19-E-163/001	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	<p>Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.</p> <p>[originally put against policies map N7 SA1, however taken this part of the response forward against Policy SI4]</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/027	Social Infrastructure	SI4 Education and childcare facilities					SI4.1	Blank	Blank						Blank		Paragraph SI4.1 of this policy makes reference to 'N11.SA3 Royal Road'. This should read 'N4.SA4 Royal Road'.	Error noted. This has been rectified by making the following wording change:  SI4.1 of this policy makes reference to ' <del>N11.SA3 Royal Road</del> '. This should read ' <b>N4.SA4 Royal</b> ' which is included in the modification table.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/038a	Social Infrastructure	SI4 Education and childcare facilities			SI4.3											Policy SI4: Education and childcare facilities 6.2 St William welcomes the adjustment to this policy which now acknowledges that the delivery of new schools and childcare facilities on identified site allocations should be of the scale required to meet projected need for school places. Education and childcare facilities need is complex and must take into account any spare capacity of existing education and childcare facilities so as not to undermine the viability of existing provision.		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/038b	Social Infrastructure	SI4 Education and childcare facilities			SI4.3											St William acknowledges that pupil projections are likely to be a range and that flexibility to expand schools or childcare settings is beneficial – however the scope of this does need to be limited taking into account need from the relevant development and site-specific characteristics. St William does not support any requirement to safeguard land in key locations (such as a high street setting) where need is uncertain and impacts on placemaking would be detrimental over the medium to long term. All safeguarding should be evidence based and not precautionary, with clear triggers for removal of that safeguarding when appropriate.  [6.4 Proposed amendments to the wording of this policy can be found at Appendix 12.]	[Appendix 12: General Policies – Suggested amendments] 3. The appropriately timed delivery of new educational facilities to meet changing pupil place needs will be secured through: b. securing the long-term option to deliver an education facility on specified site allocations <b>supported by appropriate evidence and trigger points for release if not needed</b> ; and c. requiring a flexible design so <del>the a</del> <b>facility can be phased, expanding to meet the needs of development over time up to an agreed maximum facility size at that site. can grow incrementally as pupil numbers increase over the time of the development.</b>	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 is justified by up to date evidence base, through Newham's Places for All Strategy and our work with the Council's Education Team.  Clause 1 of Policy SI4 requires the delivery of new schools and childcare facilities on identified site allocations, of the scale required to meet the projected need for school places. It is important to deliver schools on site allocations at the appropriate phase of the development. This is both to support the successful delivery of the new school and so as to not undermine existing schools in the neighbourhood. As set out in the implementation text to Policy SI4.3, the delivery of new education facilities on identified site allocations should provide a long-term option, up to 2038, to bring forward the facility, to allow for changes in the pupil place planning profile. Where the school will only be needed in the latter part of the Plan period then appropriate meanwhile uses should be determined for the site. 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-195	St William Homes LLP	Quod	Reg19-E-195/038c	Social Infrastructure	SI4 Education and childcare facilities			SI4.3											6.3 St William acknowledges that higher education and early years education are important to the wellbeing of residents and the strength of the economy. However policy needs to recognise the mixed market of providers in those spaces, the mixture of funding mechanisms they rely on, and the large and flexible catchment areas over which they operate. Early years provision is mostly delivered by the private sector and is not limited to people who live within a certain area. Higher education is delivered and funded at a strategic scale and may serve pupils who travel long distances for a particular specialism. In this context, both the limitations of, and lawfulness of, requiring developers to contribute to this type of provision need to be carefully considered. For the majority of sites, provision of financial obligations for these purposes will not be appropriate and will not constitute site specific mitigation. St William would like to ensure any supporting documents to the Local Plan (e.g. those relating to Planning Obligations) reflect this. Provision of this infrastructure may be an appropriate use of CIL revenue.  6.4 Proposed amendments to the wording of this policy can be found at Appendix 12.	[See modification linked to Reg19-E-195/038c]	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 is justified by up to date evidence base, through Newham's Places for All and our work with the Council's Education Team. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/044a	Social Infrastructure	SI4 Education and childcare facilities														The supporting table within this policy which sets out that TSP will be providing land for a Primary School is supported.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/044b	Social Infrastructure	SI4 Education and childcare facilities														[The supporting table within this policy which sets out that TSP will be providing land for a Primary School is supported.] While the HPA proposals include early years child care provision, it is considered that there should be flexibility in terms of whether this is provided as part of or separately to the Primary School, and the wording of the policy should not require that the uses are combined.		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 is justified by up to date evidence base, through Newham's Places for All and our work with the Council's Education Team. 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-208	Aman Ullah		Reg19-E-208/001b	Social Infrastructure	SI4 Education and childcare facilities						No	No						No	Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally against N7.SA1 Policies Map - taking forward SI4]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-209	Noreena Bibi		Reg19-E-209/001	Social Infrastructure	SI4 Education and childcare facilities														Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element). Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-210	Nirala Jan		Reg19-E-210/001b	Social Infrastructure	SI4 Education and childcare facilities														Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally against N7.SA1 Policies Map - taking forward SI4]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. 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-211	Muhammad Haroon		Reg19-E-211/001	Social Infrastructure	SI4 Education and childcare facilities														Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-212	Muhammad Umar		Reg19-E-212/001	Social Infrastructure	SI4 Education and childcare facilities														Support for Educational and Community Services: The Local Plan should recognize and support the repurposing of community facilities for educational and service-oriented purposes, ensuring that faith groups can continue to offer a range of community services. This includes formal recognition of the need for educational spaces for Islamic education, which are currently oversubscribed. <b>[originally against N7.SA1 Policies Map - taking forward SI2]</b>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham’s Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>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-233	RAD CHP Ltd	CBRE	Reg19-E-233/008	Social Infrastructure	SI4 Education and childcare facilities						Blank	No						Blank	<p>Draft Policy SI4: Education and childcare facilities</p> <p>Draft Policy SI4 states that new higher education facilities will be directed to, and supported in, Newham’s designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus site.</p> <p>We consider this statement to be overly limiting, and given the active engagement with the Council on creation of a new educational campus at RAD, the Royal Albert North strategic site allocation should be specifically mentioned within this policy as a site suitable for a new Higher Education campus.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy SI4 addresses the need to achieve sustainable development by seeking to deliver new higher education facilities in Newham’s designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus sites. This policy approach is to ensure convenient access to higher education facilities, allowing a range of people to easily use the services and facilities they provided either by foot or sustainable transport methods. In addition, the town centre first approach supports the vitality of our highstreets and provides students with better access to the day to day facilities they need. The Council is satisfied that the remains sound without the proposed changes.</p>
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/006a	Social Infrastructure	SI5 Burial space and related facilities														We support the publication of the Newham Burial Space Study.		Support noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/006b	Social Infrastructure	SI5 Burial space and related facilities														We expect that Newham's unmet need for new burial plots will continue to be largely met from sites on the edge of, or outside, Greater London.		<p>Comment noted. This comment has been subject to further discussion with Redbridge 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.</p> <p>Both parties are satisfied that the plan remains sound without these changes.</p>
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/006c	Social Infrastructure	SI5 Burial space and related facilities														We would like to highlight that Redbridge will not be able to meet any of Newham's unmet need for burial plots.		<p>Comment noted. This comment has been subject to further discussion with Redbridge 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.</p> <p>Both parties are satisfied that the plan remains sound without these 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/002	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	<p>1.3 NMBA supports the general aims and aspirations for the protection of existing, and provision of new burial space, promoted by the London Borough of Newham within its Draft Local Plan (Policy SI5) and is encouraged to see that recent high-level conversations between NMBA and the London Borough of Newham are being taken forward, particularly in the commissioning of an updated Burial Space Need and Provision Study which was produced by Enzygo Ltd. for the Council in July 2024. Given the availability of this up-to-date study, emerging policy should reference this report in place of the outdated 2011 Audit of London Burial Provision.</p>		<p>Support noted. This need for clarification is noted. This has been rectified by making the following wording changes:</p> <p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham’s diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. <del>As such we support the provision of additional burial space, in particular to meet the needs of Newham’s communities which cannot be met within the existing provision.</del> As such, in order to better understand this need and consider ways it can be met, we are commissioning a Newham’s Burial Space Study (2024) and Newham's Burial Space Provision and Options Appraisal Report (2025) provides a local understanding of Newham’s burial space needs. These studies provide an audit of the borough’s existing burial space provision and are which will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p> <p>Policy SI5 implementation text</p> <p>SI5.2</p> <p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham’s communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham’s Burial Space Study (2024), Newham's Burial Space Provision and Options Appraisal Report (2025) and any relevant future local and/or regional burial space evidence base.</p> <p>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme’s development. Applicants are therefore encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. <del>and opportunities for co-design with relevant communities, undertaken early in the design process.</del></p> <p>which are 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/003	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	<p>2. Policy Framework Approach to Local Plan Policy</p> <p>2.1 The National Planning Policy Framework (NPPF, December 2023) sets out the Government’s policies for planning and how these should be applied. It provides the framework within which locally prepared plans, for housing and other forms of development, can be produced. The NPPF is clear that development plans should:</p> <ul style="list-style-type: none"><li>a. Be prepared with the objective of contributing to the achievement of sustainable development;</li><li>b. Be prepared positively, in a way that is aspirational, but deliverable;</li><li>c. Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</li><li>d. Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</li><li>e. Be accessible through the use of digital tools to assist public involvement and policy presentation;</li><li>f. Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this framework where relevant).</li></ul> <p>2.2 At para. 23 the NPPF confirms that plans should contain strategic policies, providing a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This applies to burial as to all other forms of development, and identified need should be met through the development plan.</p>		Comment noted.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/004	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	<p>London Plan Policy</p> <p>2.3 The London Plan (2021) sets out a requirement, under Policy S7, for boroughs to ensure provision is made for the different burial needs and requirements of London’s communities, including for those groups for whom burial is the only option. This should be informed by a needs assessment of burial space, such as the one commissioned by Newham and undertaken by Enzygo in July 2024, and cross-borough or sub-regional working is encouraged where appropriate to identify and address need and to tackle burial space shortages within the sub-region. It is therefore clear that, whilst local authorities have no statutory duty to provide burial space themselves, there is a policy expectation under the London Plan that Local Plans should make provision to meet such need, both at borough level and on a wider strategic scale.</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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/006	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	3.2 Before we expand on the representations below, it is important to reiterate that NMBA applaud and support the inclusion and objectives of draft Policy SI5 (and it’s supporting text) within the Council’s Draft Local Plan, and Newham’s intention to identify and seek to meet burial need in the borough and beyond. The Local Plan’s recognition that different religions and cultures have differing burial needs is also supported.		Support noted.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/009a	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank					No	Blank	<p>Representation No. 2: Cross-Borough Working and Strategic Cooperation</p> <p>3.5 Implementation Point SI2.2 on page 162 of the draft plan recognises that some facilities naturally serve a catchment outside of a local neighbourhood or indeed the borough boundary. This is an important recognition, and is of particular importance to the provision of burial facilities where strategic need exists and users are attracted by factors that transcend borough boundaries. London Plan Policy S7 highlights the importance of cross-borough or sub-regional work in this area.</p> <p>3.6 However there is no consideration of this strategic, cooperative approach within the draft Policy SI5 and this is a significant omission noting, as above, the clear expectation for cross-boundary working set out in the London Plan. This should be reflected in Policy SI5 which should not be restricted to meeting just Newham’s own burial needs....</p> <p>...3.7 London Plan Policy S7 requires local authorities to meet their own needs and to work cooperatively with other authorities to meet wider needs both within Newham and beyond. To meet this expectation, it is therefore considered that Policy SI5 should include a commitment from the London Borough of Newham to work with neighboring local authorities to identify sites to meet wider strategic and long-term burial needs particularly for those groups – like Muslims – within and beyond Newham for whom there is no other option.</p>	<p>[4.4 Based on the national and strategic London-wide policy outlined above, we request the following revisions to the Newham Draft Submission Local Plan:]</p> <p>2. Draft Policy SI5 should highlight the need for cross-boundary and strategic working in order to identify sites that are genuinely deliverable and will meet identified need in Newham and beyond in line with London Plan Policy S7;</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as decisions on new burial space will be made in accordance with Policy SI5 and London Plan Policy S7. The Council’s objective for this policy approach is to ensure new burial space meets the needs of our population. It is a policy for Newham’s Development Management Team to help assess application in the borough. The Council is working with other boroughs to identify suitable burial space sites, this work is being led by the Environment and Sustainable Transport Team. 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/009b	Social Infrastructure	S15 Burial space and related facilities						Blank	Blank						Blank	...Paragraph 3.147 states that a Newham Burial Space Study is being commissioned however, as this study has now been completed, the text within this paragraph should be updated and the 2024 study relied on as the evidence base for this policy (taking into account our comments at appendix NTR2)...		<p>This need for clarification is noted. This has been rectified by making the following wording changes:</p> <p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham’s diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. <del>As such we support the provision of additional burial space, in particular to meet the needs of Newham’s communities which cannot be met within the existing provision.</del> As such, in order to better understand this need and consider ways it can be met, we are commissioning a Newham’s Burial Space Study (2024) and Newham's Burial Space Provision and Options Appraisal Report (2025) provides a local understanding of Newham’s burial space needs. These studies provide an audit of the borough’s existing burial space provision and are which will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p> <p>Policy S15 implementation text</p> <p>S15.2</p> <p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham’s communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham’s Burial Space Study (2024), Newham's Burial Space Provision and Options Appraisal Report (2025) and any relevant future local and/or regional burial space evidence base.</p> <p>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme’s development. Applicants are therefore encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. <del>and opportunities for co-design with relevant communities, undertaken early in the design process.</del></p> <p>which are 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/010a	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	Representation No. 3: Location of Burial Facilities 3.8 Burial provision may need to be brought forward on land that is unsuitable, or not in demand, for other forms of development. Draft Policy SI5 should therefore include a recognition that burial facilities may need to be provided outside of the built settlement envelope and that, in line with para. 109 of the NPPF, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and that this should be taken into account in decision-making.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy SI5 addresses the need to achieve sustainable development, as set out in the IIA. As such, the Policy seeks to deliver new burial space which is publically accessible and will not cause unacceptable highways impacts. As such, the implementation text sets out that sites should be accessible to residents, in particular by public transport. Applicants must submit a Transport Assessment and Travel Plan in line with Local Plan policy T3. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/010b	Social Infrastructure	SI5 Burial space and related facilities														3.9 Implementation Point SI5.2 states that new burial sites should be accessible to residents particularly by public transport. Whilst we recognise the need to ensure access by sustainable modes is maximised, particularly in relation to those visiting graves, it should be recognised that the nature of burial rituals means that attendance by public transport is not always desirable or appropriate and this should be taken into account in the supporting text to Policy SI5, and in decision making.	[4.4 Based on the national and strategic London-wide policy outlined above, we request the following revisions to the Newham Draft Submission Local Plan:] 3. Draft Policy SI5 should recognise that burial facilities may be provided outside of established settlements and that the expectation for sustainable transport accessibility will need to be adjusted in line with this and with paragraph 109 of the NPPF. The nature of burial and funeral rituals means that public transport use may not always be desirable or appropriate; and	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy SI5 addresses the need to achieve sustainable development, as set out in the IIA. As such, the Policy seeks to deliver new burial space which is publically accessible and will not cause unacceptable highways impacts. As such, the implementation text sets out that sites should be accessible to residents, in particular by public transport. Applicants must submit a Transport Assessment and Travel Plan in line with Local Plan policy T3. 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/011	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	<p>Representation No. 4: Quality of Burial Facilities</p> <p>3.10 NMBA is pleased to see recognition within the draft plan that burial customs and rituals vary across religions and cultures and that the re-use of graves, for example, would be unacceptable to those of Jewish or Muslim faith. In addition, the Islamic religion also requires the following in relation to burial:</p> <ul style="list-style-type: none"><li>• Need for haste – burial should take place as quickly as possible, ideally within 24 hours of death</li><li>• Shroud burial – the body should be wrapped in a cotton shroud and is not buried within a coffin</li><li>• Orientation of grave – the deceased should be placed lying on the right shoulder facing Makkah</li><li>• Allowance for burial of all body tissue including foetal remains, still births and amputated body parts</li><li>• Mounded graves – the grave should be mounded to a hand span for clear demarcation to ensure respect of the dead</li><li>• Memorials – grave markers should be simple and without ostentation, reflecting the belief that all people are equal before God</li><li>• Prayer facilities – facilities for communal prayers where prayers can be carried out facing Makkah and following ablutions</li></ul> <p>3.11 Not all cemeteries and burial facilities accommodate the above requirements, and the Local Plan should make clear that new facilities will be required to meet a range of specific requirements such as the above. It is noted that in recent years some Muslim communities within Newham have been forced to take up re-used grave space due to their being no alternative provision within the borough, such as at Woodgrange Park Cemetery as referred to in paragraph 4.2.12 of the Burial Space Need and Provision Study. However, this represents a significant religious compromise.</p>	<p>[4.4 Based on the national and strategic London-wide policy outlined above, we request the following revisions to the Newham Draft Submission Local Plan:]</p> <p>4. Draft Policy SI5 should recognise that different cultures and religions will have different requirements and that these are not always met by existing provision, meaning that assessment of existing and new provision should take a qualitative as well as a quantitative approach.</p>	<p>Support noted. A change to this policy approach has not been made. We did not consider this change to be necessary as clause 2 of Policy SI5 clearly sets out that new burial space development should meet the needs and requirements of Newham's population, including for those parts of the community for whom burial is the only option.</p> <p>This policy approach is further reinforced in the implementation text which states: '...new burial spaces should demonstrate they are designed to meet the needs of Newham’s communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham Burial Space Study and opportunities for co-design with relevant communities, undertaken early in the design process'.</p> <p>Further to this, the justification text is very clear regarding the need to recognise that different cultures and religions have different requirements, paragraph 3.147 states: '...funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham’s diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. As such we support the provision of additional burial space, in particular to meet the needs of Newham’s communities which cannot be met within the existing provision'.</p> <p>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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/013	Social Infrastructure	S15 Burial space and related facilities						Blank	Blank						Blank	<p>[Other Matters</p> <p>3.12 In the interests of thoroughness, the following matters are also noted in respect of the emerging Local Plan and its supporting evidence base:]</p> <p>ii. The Burial Space Need and Provision Study commissioned by the London Borough of Newham and prepared by Enzygo is a valuable up-to-date resource to assist in identifying and meeting burial need in Newham and across the wider region. It’s importance is heightened as burial need has up to now been assessed with reference to the Audit of London Burial Provision which dates from 2011 and was demonstrated at appeal in 2017 (Appeal Ref: APP/B5480/W/15/3132860 made by Gardens of Peace regarding land at Oak Farm, Romford) to be unreliable and dated. This updated document should now form part of the evidence base for the emerging Local Plan, replacing the 2011 Audit of London Burial Provision as the basis for Policy S15. The 2024 Burial Space Need and Provision Study has been reviewed by NMBA and comments on that document are provided at Appendix NTR2.</p>		<p>Comment noted. This need for clarification is noted. This has been rectified by making the following wording changes:</p> <p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham’s diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. <del>As such we support the provision of additional burial space, in particular to meet the needs of Newham’s communities which cannot be met within the existing provision. As such, in order to better understand this need and consider ways it can be met, we are commissioning a Newham’s Burial Space Study (2024) and Newham’s Burial Space Provision and Options Appraisal Report (2025) provides a local understanding of Newham’s burial space needs. These studies provide an audit of the borough’s existing burial space provision and are</del> which will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p> <p>Policy S15 implementation text</p> <p>S15.2</p> <p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham’s communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham’s Burial Space Study <b>(2024), Newham’s Burial Space Provision and Options Appraisal Report (2025) and any relevant future local and/or regional burial space evidence base.</b></p> <p><b>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme’s development. Applicants are therefore encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. and opportunities for co-design with relevant communities, undertaken early in the design process.</b></p> <p>which are 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-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/015a	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	4. Conclusions 4.1 On behalf of our clients, Newham Muslim Burial Association, we respectfully submit these representations for the Council’s consideration, primarily focusing upon draft Policy SI5: Burial Space and Related Facilities. 4.2 In setting the broader policy context, the NPPF confirms that plans should contain strategic policies, providing a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This includes planning for and allocating sufficient sites to meet identified burial needs.		Comment noted.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/015b	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	4.3 Policy S7 of the London plan ‘Burial Space’ confirms that development plans should ensure that provision for meeting London’s burial needs is made, including for those groups – such as Muslims – for whom burial is the only option, and encourages cross-borough working to tackle burial space shortages within the region. There is therefore a planning policy imperative for local authorities to meet burial space needs, both within and beyond borough boundaries. Draft Policy SI5 should reflect this requirement to relate to a wider area than Newham alone.		A change to this policy approach has not been made. We did not consider this change to be necessary as decisions on new burial space will be made in accordance with Policy SI5 and London Plan Policy S7. The Council’s objective for this policy approach is to ensure new burial space meets the needs of our population. It is a policy for Newham’s Development Management Team to help assess application in the borough. The Council is working with other boroughs to identify suitable burial space sites, this work is being led by the Environment and Sustainable Transport Team. The Council is satisfied that the plan is sound without the proposed changes.



Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/017	Social Infrastructure	S15 Burial space and related facilities													Blank	<div><div>[Appendix NTR2 Comments on the Burial Space Need and Provision Study Enzygo Ltd, July 2024</div><div>The following comments are provided with reference to the Burial Space Need and Provision Study, commissioned by the London Borough of Newham and prepared by Enzygo Ltd, July 2024. These comments are provided in good faith in order to assist the London Borough of Newham in ensuring that their emerging Local Plan relies on up to date and accurate information, and is based on NMBA's extensive knowledge and understanding of the Muslim burial context in North-East London. ]</div><div><ul style="list-style-type: none"><li>• The assessment considers quantitative data but not qualitative data regarding whether cemeteries identifying as suitable for Muslim burial are in fact meeting the basic religious requirements necessary for all Muslims. NMBA and Gardens of Peace have extensive data on this, some of which was used in relation to the 2017 Havering appeal, and would be pleased to provide this on request.</li></ul></div></div>		<div><p>The Council's objective for this policy approach is to ensure new burial space meets the needs of our population. However, the Council recognises the importance of ensuring the Plan is clear and as such is now referring to its additional work on burial space, any future evidence base and that new space must be co-designed to ensure that local people can meaningfully input into a scheme's development. The Council has therefore made the following wording changes:</p><p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham's diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. <del>As such we support the provision of additional burial space, in particular to meet the needs of Newham's communities which cannot be met within the existing provision. As such, in order to better understand this need and consider ways it can be met, we are commissioning a Newham's Burial Space Study (2024) and Newham's Burial Space Provision and Options Appraisal Report (2025) provides a local understanding of Newham's burial space needs. These studies provide an audit of the borough's existing burial space provision and are</del> which will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p><p>Policy S15 implementation text</p><p>S15.2</p><p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham's communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham's Burial Space Study <b>(2024), Newham's Burial Space Provision and Options Appraisal Report (2025) and any relevant future local and/or regional burial space evidence base.</b></p><p><b>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme's development. Applicants are therefore encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. and opportunities for co-design with relevant communities, undertaken early in the design process</b></p><p>which is included in the modification table.</p></div>
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/017a	Social Infrastructure	S15 Burial space and related facilities							Blank	Blank					Blank	<div><div>Appendix NTR2 Comments on the Burial Space Need and Provision Study Enzygo Ltd, July 2024</div><div>The following comments are provided with reference to the Burial Space Need and Provision Study, commissioned by the London Borough of Newham and prepared by Enzygo Ltd, July 2024. These comments are provided in</div></div>		<div><p>Comment noted.</p></div>



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
																			good faith in order to assist the London Borough of Newham in ensuring that their emerging Local Plan relies on up to date and accurate information, and is based on NMBA's extensive knowledge and understanding of the Muslim burial context in North-East London. <ul style="list-style-type: none"><li>Paragraph 2.8.10 – please note that at the current time the Folly Lane Muslim Cemetery extension, granted planning permission in July 2023, is limited by planning condition to a maximum of 100 burials per year.</li></ul>		
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/017b	Social Infrastructure	SI5 Burial space and related facilities						Blank	Blank						Blank	[Appendix NTR2 Comments on the Burial Space Need and Provision Study Enzygo Ltd, July 2024  The following comments are provided with reference to the Burial Space Need and Provision Study, commissioned by the London Borough of Newham and prepared by Enzygo Ltd, July 2024. These comments are provided in good faith in order to assist the London Borough of Newham in ensuring that their emerging Local Plan relies on up to date and accurate information, and is based on NMBA's extensive knowledge and understanding of the Muslim burial context in North-East London.] <ul style="list-style-type: none"><li>Paragraphs 2.8.22 and 2.8.23 – two new facilities are referred to in these paragraphs but in fact they relate to the same burial ground which is the new Gardens of Peace facility in the London Borough of Havering, granted permission on appeal in 2017 and due to open in late 2024. This should be counted as one single facility with a total indicative capacity of 10,000 grave plots to avoid double-counting and a significant misrepresentation of the capacity available. This is also referred to in 5.4.22.</li></ul>		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/001	Social Infrastructure			3.117													Social infrastructure In addition to the four listed categories <ul style="list-style-type: none"><li>Social infrastructure we have a statutory duty to provide: schools; some early years provision.</li><li>Social infrastructure with a nationally set target: playing pitches; built sport and recreation facilities; health facilities.</li><li>Council delivered social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres.</li><li>Community/charity/market-led: wider youth provision; faith facilities; private built sport and recreation facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li></ul> .....I would like to add a fifth - Council and Community PARTNERSHIPS	A change to this policy approach has not been made. We did not consider this change to be necessary as the introduction to the Social Infrastructure chapter sets out the different ways in which we plan for and consider the need for different types of social infrastructure. Whilst we appreciate and value the need for partnership working it is not considered that adding this detail to this part of the plan would help with its clarity or deliverability. 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-017	Bonny Downs Community Association		Reg19-E-017/002	Social Infrastructure															Especially in the current financial climate and in line with LBN’s Community Wealth-building agenda, we need to maximise and multiply the resources of the council and third-sector groups. services are always stronger when they are delivered WITH and BY local people, rather than TO or FOR them.		Comment noted
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/003	Social Infrastructure															LBN needs to recognise and assist community organisations in delivering services that it cannot afford and that can be delivered most effectively by local people at grassroots-roots level.The People Powered Places grants were a good step in this direction but it’s not primarily cash that community initiatives need. Buildings and places are key to delivering sustainable social value and impact.		Comment noted
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/005	Social Infrastructure															Rental discounts for Community facilities are currently capped at 80% of a notional ‘market rent.’ This is both morally and pragmatically wrong. Even a 20% contribution of a notional ‘market rent’ is in effect a Charity Tax. Charitably raised funds that could be spent on providing community services and developing charities’ infrastructure are being diverted to LBN for no direct benefit to the communities they serve.		Comment noted
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/006	Social Infrastructure															For instance, a community centre with a full management and maintenance lease, providing services the council would like to deliver but can’t afford, could pay more than half a million pounds over the course of a 30-year lease. As an aging Chair of a local charity, I could never agree to burden future generations of volunteers with such a commitment.		A change to this policy approach has not been made. We did not consider this change to be necessary as Clause 7 of Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/007	Social Infrastructure															In terms of the council’s budget these amounts are insignificant but they would be crippling for local charities. Payments would have to come out of unrestricted reserves that are the life-blood for sustainability and development of services. To pay a rent of even £10k per year would cost charities much more to raise. Fundraisers would need to be employed in an increasingly difficult climate where grants to maintain vital services are getting harder and harder to obtain.		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/009	Social Infrastructure															Capital investment in council buildings by charity tenants dramatically increases the social and financial value of these assets. There would be a significant increase in cost to the council if these relationships end - even if it’s just providing security for empty buildings. That’s not to mention the terrible loss of community delivered social value.		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/010	Social Infrastructure															As the LBN v Flanders Community Centre court case in 2016 proved, applying ‘market-rent’ calculations to designated community buildings is fundamentally flawed. If cash is king, buildings should either be let out at ‘market-rates,’ sold off - or they should be positively supported as vital community wealth-building hubs.		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-017	Bonny Downs Community Association		Reg19-E-017/011	Social Infrastructure															100% Social Value rent relief would mean charities could use their assets to attain and maintain delivery Quality Marks. Financially penalising charities for not having such marks is self-defeating. When money is tight this is the first sort of investment to be cut.		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/012	Social Infrastructure															On the other hand, genuine, intentional partnerships between LBN and community groups, could maximise resources and multiply impact. Agreed Social Value targets would ensure groups using council facilities are delivering vital and excellent services and help these groups to develop positive impact and sustainability. I would love to work in closer collaboration with LBN on this Community Wealth-building agenda.		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/013	Social Infrastructure															Specific example:NEWway/BDCA - 35 Vicarage Lane E6This derelict ex-council call centre was used to accommodate homeless guests as part of the SWEP protocol last winter. Once the need for this provision ended in March, BDCA/NEWway were offered a two-year meanwhile lease on the building. We invested more than £10,000 cash and hundreds of volunteer hours in bringing the building back into use. It is currently housing services including our Family Hub, supporting families without recourse to public funds, food bank, food club and debt advice centre. We also offered to make spaces available for SWEP this winter, linked in with support from NEWway, based in the Bobby Moore Pavilion on Flanders Field.  LBN is actually saving money, without the need for security costs. But we were asked to pay an annual rental to LBN initially of £21,750 pa. This was later reduced to c£10.5k.  Had I have known that a rental charge was envisaged, I would never have agreed to negotiations starting with LBN. The building would still be derelict, costing LBN money and depriving our community of much needed services.		Comment noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/021	Social Infrastructure															NEWwayI welcome the flexibility on centralising service delivery to 'town centres'		Support noted.
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/022	Social Infrastructure															' On the whole, delivering services from easily assessable locations makes sense. But in some cases the sense of belonging and offer of community support is best provided in mainly residential communities.		Comment noted
Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/023	Social Infrastructure															We hope this will be true of the approved plans to redevelop Bonny Downs Church, E6 as a co-housing project in partnership with NEWway and BDCA. Our aim is to provide move-on accommodation for people experiencing homelessness, with the wraparound care and support they will need to become independent in the longer term.		Comment noted.

Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/09	Social Infrastructure			Evidence												Having reviewed the Council’s evidence base (including the 2022 Community Facilities Needs Assessment) it is clear that further evidence gathering is required to fully determine the scale of facility necessary to meet the objectively assessed needs of the community across the plan period.		<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</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>and local need for the proposed facility.</p> <p>Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/007	Social Infrastructure							Blank	Blank						Blank	Representation No. 1: Social Infrastructure and Community Facilities 3.3 Section SI of the draft Local Plan relates to ‘social infrastructure’ and ‘community facilities’, and we note that the two terms are used somewhat interchangeably. Whilst ‘social infrastructure’ is defined within the Glossary at Appendix 1, ‘community facilities’ is not, and we therefore suggest that greater clarity could be achieved by referring to ‘social infrastructure’ throughout.	4.4 Based on the national and strategic London-wide policy outlined above, we request the following revisions to the Newham Draft Submission Local Plan: 1. Cemeteries and burial facilities should be included in the definition of ‘social infrastructure’ at Table 18 within the Glossary at Appendix 1 to ensure consistency within the SI chapter of the plan, in particular Policy SI5;	<p>This need for clarification is noted. This has been rectified by making the following wording change:</p> <p>Social Infrastructure: Includes the uses described in the table below. Table 18: Social Infrastructure use types and Use Classes</p> <p><b>Burial Space (SI5)</b></p> <p><b>Cemeteries and burial grounds</b>                      <b>Sui Generis</b></p> <p>which is included in the modification table.</p>
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/014	General							Blank	Blank						Blank	[Other Matters 3.12 In the interests of thoroughness, the following matters are also noted in respect of the emerging Local Plan and its supporting evidence base:] iii. Table 16 sets out the monitoring framework for the Local Plan, and NMBA are supportive of Newham’s commitment to monitor new burial provision and take up of existing capacity to ensure that appropriate provision is made.		Support noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/014	Social Infrastructure															3.4 Strategic support for new education floorspace is contained within the London Plan, as follows: • Policy S3 Education and childcare facilities and Policy E11 Skills and opportunities for all, both of which promote opportunities for education and training  3.5 This is echoed in the current Newham Local Plan which supports new and improved education and training within the Borough in order to underpin economic development in Policies J1 Investment in the New Economy, J3 Skills and Access to Employment, and Policies INF8 Community Facilities and INF9 Infrastructure Delivery.		Support noted.

Reg19-E-042	Mohammed Vali		Reg19-E-042/001	Social Infrastructure			Evidence				No	No					No	<div>Local Plan: Abbey Mill N7 SA1</div> <div>Local Authority Study suggests adjoining area to Three Mill and Manor Road Area suggests deficiency in place of worship, but need study fails to define currently in use as a mosque at Westham Abbey Mill N7 SA1.</div> <div>[originally against Policy Map Abby Mill N7 SA1 - taking forward as CFNA Evidence base]</div>	<div>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</div> <div>The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</div> <div>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</div> <div>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants encouraged to speak with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</div> <div>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough’s network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision</div>
-------------	---------------	--	-----------------	-----------------------	--	--	----------	--	--	--	----	----	--	--	--	--	----	---	--

LB Newham Response		and local need for the proposed facility.  Finally, Policy BFN3 requires any application for the loss, gain or reconfiguration of social infrastructure floorspace to undertake a Social Value Impact screening assessment. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. It assists decision-makers by giving them better information, but it does not make the decision for them.  The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.
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		



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-060	Royal Albert Dock Trust		Reg19-E-060/002	General			Evidence Base												<p>With regard to the Assessment itself:</p> <p>1. Consultation: Evidently you contacted governing bodies but had no response. The CEO of British Rowing is on the board of the RADT as is a senior representative of British Canoeing. They both have a strategy for using the docks more and for increasing access/participation to their sports particularly in places of relative deprivation. Who did you contact?</p> <p>2. Consultation: Why did you not contact the CEO of the RADT? He sits about 200 yards from your council building.</p> <p>3. Availability: Yes, the clubs charge a membership fee but, as mentioned above, this is relatively low compared to the actual cost and also we have the charitable providers mentioned.</p> <p>4. We, of course, agree with 6.271 <a href="#">[refer to paragrpah 6.271 in the Newham Built Lesiure Needs Assessment]</a>. It is very much in line with our charitable objective.</p> <p>5. Supply and Demand Analysis 6.272 <a href="#">[refer to paragrpah 6.272 in the Newham Built Lesiure Needs Assessment]</a>. “There is no identified need for additional provision of watersports, but opportunities to continue develop access to this type of provision through commercial investment should be supported.” We take issue with this statement. There is no identified need because there was no real analysis.</p> <p>LBN is blessed with having an amazing facility on its doorstep. Considering that young people in Newham have amongst the worst health outcomes in the country, it seems incredible that the LBN does not offer every young person the chance to have a go at watersports. LYR and MSSC are experienced and also very cost-effective providers. We would very much like to discuss with LBN how the RADT can work with LBN to give young people in Newham the opportunity they deserve.</p>		A change to this policy approach has not been made. The Built Needs Assessment was undertaken through joint working with the Council's Leisure and Planning Policy Teams. The appointed consultant, delivering the assessment, sought to contact all relevant stakeholders and in doing so followed the methodology set out in the Sport England Assessing Needs and Opportunities Guidance. It should be noted that Newham's Built Leisure Needs Assessment and the approach to planning for sport and recreation facilities is supported by Sport England.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/098	Social Infrastructure															No comment.		Comment noted.



Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/01	Social Infrastructure			Evidence				No	No					No	<p>Local Plan: Abbey Mill N7 SA1</p> <p>Local Authority Study suggests adjoining area to Three Mill and Manor Road Area suggests deficiency in place of worship, but need study fails to define currently in use as a mosque at Westham Abbey Mill N7 SA1. Westham is situated in proximity to the Three Mill as an existing place of worship in use within catchment to the Three Mills and Manor Road and Westham station as a community opportunity area. The whole wider, densely populated area is currently deficient in purpose-built mosques, but the local plan had allocated only small-scale faith use at Abbey Mill Site despite evidence-based needs. <b>[originally against N7 SA1 - taking forward evidence base]</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as this chapter is justified by up to date evidence base, through the Community Facilities Needs Assessment (2022). We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.</p> <p>It should be noted that, the development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what</p>
-------------	-------------	-------------	----------------	-----------------------	--	--	----------	--	--	--	----	----	--	--	--	--	----	--	---

LB Newham Response																	type of facility is needed and when it is likely to be operational.  Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.  The Council is satisfied that the plan is sound without the proposed changes.
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																	

Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/02	Social Infrastructure			Evidence				No	No					No	<p>As a user of this Abbey Mill site I am impacted by equality Act 2010 and my right to Social Well Being Act.</p> <p>Local Authority Study suggests adjoining area to Three Mill and Manor Road Area suggests deficiency in place of worship, but need study fails to define currently in use as a mosque at Westham Abbey Mill N7 SA1. <span style="color: red;">[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward CFNA Evidence base]</span></p>	<p>The pandemic has highlighted that a faith space isn't just a place where people go to worship.</p> <p>Most places of worship have opened up</p> <p>Provided Funerals and volunteers and community engagement and p other activities.</p> <p>Provision of purpose built facilities, services and future need should be considered to accommodate large growing muslim population census 2021 approx 122.000.</p> <ul style="list-style-type: none"><li>• The faith community is very varied with varied needs and characteristics and very diverse no facility exist female sex to enjoy spiritual needs due to the lack of large land facilities available in newham needs.</li></ul> <p>There is a need for mutual specific types of spaces facilities required to perform large funeral Prayers members of community.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as this chapter is justified by up to date evidence base, through the Community Facilities Needs Assessment (2022). We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham's social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn't – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.</p> <p>It should be noted that, the development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure. Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetreets Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what</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>type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/018	Social Infrastructure							Blank	Blank						Blank	<p>[Existing community facilities / Cultural facilities and sports and recreation facilities Regarding policy SI1, SI2, SI3:]</p> <p>- We believe that free or low-cost spaces for communities are vital and should be strongly protected, with and increase, not decrease in these spaces. There are many reasons for this, including the lack of space for children to play and do homework if they live in overcrowded home environments.</p> <p>- Community facilities should only be demolished as a last resort. If they are, they must be reprovided like-for-like in terms of space, availability, facilities and cost to use. In the interim any users of the space such as organisations/community groups must be offered a meanwhile space.</p>		<p>A change to this policy approach has not been made . We did not consider this change to be necessary as the Council's objective for policies SI1, SI2 and SI3 is to protect the community spaces needed to support Newham's residents and to support new facilities coming forward which meet the needs of their users. Policy SI2 has specific requirements, set out in clause 7, for ensuring new community space meets the needs of its users, including the need for a Social Value-Health Impact Assessment which will address a facilities affordability. 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-236	Friends of Queen's Market		Reg19-E-236/021	General							Blank	No						Blank	<p>4. The plan is inconsistent with London and national policy Any proposed redevelopment of the market within the Plan does not take into account NPPF 8 access to healthier food, including the fact that it classes local shops - which could include a market - as community facilities.</p> <p>NPPF 8. Promoting healthy and safe communities 96 (94) Planning policies and decisions should aim to achieve healthy, inclusive and safe places and (beautiful) buildings which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p> <p>97.95. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local</p>		<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 markets in Policy HS4: Markets, pop-ups and meanwhile uses.</p> <p>However, the Council recognises the importance of ensuring the Plan adequately protects markets and the value these spaces actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the high streets they are located in. Therefore, the Council proposes to address your concerns by proposing an amendment to Policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing.</p> <p>The objective of the SV-HIA tool is to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing. The purpose of a SV-HIA is to act as a critical friend, to ascertain whether the impact on social value and health of a particular development proposal is acceptable or not. SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. The Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to Policy BFN3:</p> <p>The following developments will be expected to submit a Health and Social Value Impact screening assessment: i. Major development ii. Loss, gain or reconfiguration of social infrastructure floorspace iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops iv. Loss, gain or reconfiguration of publicly accessible green space <b>v. Development impacting an existing or creating a new internal or external permanent market</b></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-244/034	Social Infrastructure															<p>Social infrastructure</p> <p>In addition to the four listed categories:</p> <ul style="list-style-type: none"><li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision.</li><li>• Social infrastructure with a nationally set target: playing pitches; built sport and recreation facilities; health facilities.</li><li>• Council delivered social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres.</li><li>• Community/charity/market-led: wider youth provision; faith facilities; private built sport and recreation facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li></ul> <p>We would like to add a fifth - Council and Community PARTNERSHIPS</p> <p>Especially in the current financial climate and in line with LBN’s Community Wealth-building agenda, we need to maximise and multiply the resources of the council and third-sector groups. services are always stronger when they are delivered WITH and BY local people, rather than TO or FOR them.</p> <p>LBN needs to recognise and assist community organisations in delivering services that it cannot afford and that can be delivered most effectively by local people at grassroots-roots level.</p> <p>The People Powered Places grants were a good step in this direction but it’s not primarily cash that community initiatives need.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the introduction to the Social Infrastructure chapter sets out the different ways in which we plan for and consider the need for different types of social infrastructure. Whilst we appreciate and value the need for partnership working it is not considered that adding this detail to this part of the plan would help with its clarity or deliverability. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-244	One Newham		Reg19-E-244/038	Green and Water Spaces															<p>Cricket</p> <p>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.</p> <p>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.</p>		<p>Comment noted. Please note that site allocation N13.SA3 Former East Ham Gasworks is required to protect, enhance and bring back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</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-244/039	Green and Water Spaces															Newham City Farm  Newham 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.		Comment noted. 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.
Reg19-E-244	One Newham		Reg19-E-244/043	Social Infrastructure															We are aware of several other communities / community buildings impacted such as the garden cafe and Abbey 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-EC-003	Muhammad Uddin		Reg19-EC-003/001	Social Infrastructure							Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>1. Inclusive Design of Community Spaces</p> <p>The Local Plan should prioritize the design and development of community spaces that are flexible and adaptable to the diverse backgrounds within the borough. These spaces should be accessible to all, accommodating different cultures and community activities.</p>	<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 applied in the round.</p> <p>The development principles section of the site allocation direct the reader to Local Plan Policies SI1 and SI2 for the policy requirements regarding the delivery of a re-provided faith facility at N7.SA1.</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs of underrepresented groups, including the elderly, women, children, and those with disabilities. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"><li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li><li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li><li>• be inclusive and accessible.</li></ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA’s will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>