

## Newham Council response to IN2.1: Inspector's Further Preliminary Questions to the Council

FPQ1. (a) Could the Council provide a list of all the specified information that applicants are required to provide along with the policy and/or other part of the Plan that refer to each?

(b) What is the justification for referring to these information requirements in the Plan, rather than on a published list which the Council will review at least every two years?

### Council Response:

a) The requirements are summarised in the table below, alongside the key policies that explain the purpose of the requirement(s), and any further references across the Plan that are necessary for consistency of approach. The final column of the table provides an indication of how the list of requirements/assessment can be integrated into typical submission documents, such as planning statements, design and access statements, energy statements etc.

| Requirement/<br>Assessment                                            | Key policy<br>setting it out                     | Consistency<br>references in<br>policies | Can be integrated into                                                                                               |
|-----------------------------------------------------------------------|--------------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Meanwhile Use Strategy</b>                                         | BFN2.4                                           |                                          | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Post occupancy surveys</b>                                         | BFN2.5                                           | D2                                       | Post-completion, stand-alone submission.                                                                             |
| <b>Social Value and Health Impact Assessment screening/assessment</b> | BFN3.2-3                                         | BFN2.2<br>SI1.1<br>SI2.7<br>GWS1.2       | Environmental Impact Assessment, with the exception of the provided screening template.                              |
| <b>Financial viability assessment</b>                                 | BFN4.4<br>H3.1-2<br>H4.2<br>H5.4<br>H8.3<br>H9.3 |                                          | Self-standing submission                                                                                             |
| <b>Active Travel Zone Assessment</b>                                  | D2.2                                             |                                          | Transport assessment, following new guidance by TfL                                                                  |
| <b>Public Realm Management Plan</b>                                   | D2.5                                             |                                          | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Design and Access Statement</b>                                    | D1                                               | D4<br>H11<br>GWS1<br>GWS2<br>CE1<br>CE6  | Self-standing submission                                                                                             |

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|                                                                                       |                                 | T2<br>T4<br>T5   |                                                                                                                      |
| <b>Plant Maintenance Plan</b>                                                         | D6                              |                  | Pollution Management Statement                                                                                       |
| <b>Archaeological desk-based assessment / Field Evaluation</b>                        | D8.1-2                          |                  | Heritage Statement                                                                                                   |
| <b>Heritage Impact Assessment</b>                                                     | D4<br>D7<br>D9                  |                  | Heritage Statement                                                                                                   |
| <b>Townscape Visual Impact Assessment</b>                                             | D4<br>D7.1<br>D9.2-3            |                  | Design and Access Statement or Heritage Statement                                                                    |
| <b>Town centres network gap analysis</b>                                              | HS1.1                           |                  | Design and Access Statement                                                                                          |
| <b>(main town centre uses) Sequential test</b>                                        | HS3.2<br>SI2.3<br>SI2.6<br>J2.4 |                  | Planning statement or stand-alone submission                                                                         |
| <b>(retail, leisure, office) Impact Assessment</b>                                    | HS3.3<br>SI2.3<br>SI2.6<br>J2.4 | HS1<br>HS8.4     | Planning statement or stand-alone submission                                                                         |
| <b>Affordable Commercial, Business and Service (Class E) Units Marketing Strategy</b> | HS2.6                           |                  | Planning statement                                                                                                   |
| <b>Vacancy Prevention Strategy</b>                                                    | HS2.6                           | HS1.2-3<br>HS3.4 | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Marketing Strategy</b>                                                             | HS2.7                           | HS1.2-3<br>HS3.4 | Planning statement                                                                                                   |
| <b>Pop-ups and Markets Management Plan</b>                                            | HS4.3                           |                  | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Evening and Night Time Operation Management Plan</b>                               | HS5.4                           |                  | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>(delivery-led businesses) Sites Options Test</b>                                   | HS71-2                          |                  | Planning statement or design and access statement                                                                    |
| <b>assessment that the existing use is</b>                                            | SI1.1<br>SI3.1                  |                  | Planning Statement                                                                                                   |

|                                                                                                     |                               |                      |                                                                                                                      |
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| <b>surplus</b> to current and future needs                                                          | GWS1.2                        |                      |                                                                                                                      |
| <b>(loss of floorspace) evidence that the facility has been actively marketed</b>                   | SI1.1<br>SI3.1<br>J3.5        |                      | Planning Statement                                                                                                   |
| <b>(Social Infrastructure) needs-based assessment</b>                                               | SI1.1<br>SI3.2<br>SI4.2       |                      | Planning statement                                                                                                   |
| <b>Consultation and co-design</b>                                                                   | BFN2<br>SI2.7                 | D1<br>D2<br>GWS1     | Consultation Statement                                                                                               |
| <b>Economic Strategy</b> (floospace demand, market testing, and phasing strategy)                   | J1.3                          | J4.3                 | Planning Statement, or stand-alone document.                                                                         |
| <b>(employment uses) Relocation Strategy</b>                                                        | J3.1-4                        | J2.2                 | Economic Strategy                                                                                                    |
| <b>Assessment of the increased demands for childcare facilities</b>                                 | J4.2                          |                      | Planning statement                                                                                                   |
| <b>Specialist housing need and use evidence</b>                                                     | H1.3<br>HS6.1-4<br>H10.2      | H2.4<br>H7.1<br>H9.2 | Planning statement                                                                                                   |
| <b>Residential Management Plan</b>                                                                  | H6.5<br>H8.6<br>H9.1<br>H10.4 |                      | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Nomination agreement/ letter of comfort</b>                                                      | H8.4                          |                      | Planning statement                                                                                                   |
| <b>Evidenced regard to Newham and Pan-London Private Sector Rental Licensing benchmark criteria</b> | H11.3                         |                      | Design and Access Statement                                                                                          |
| <b>Green Space Management Plan</b>                                                                  | GWS1.5                        | GWS3.1               | The planning statement, or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Water-dependent uses deficit assessment</b>                                                      | GWS2.3                        |                      | Planning statement.                                                                                                  |
| <b>Ecological assessment</b>                                                                        | GWS3.2                        |                      | EIA or planning statement                                                                                            |
| <b>Arboriculture report / i-Tree study</b>                                                          | GWS3.1<br>GWS4.1              |                      | Stand-alone study.                                                                                                   |
| <b>Tree and Hedgerow Management Plan</b>                                                            | GWS4.3                        |                      | The planning statement, or as a stand-alone submission                                                               |

|                                                                                                                                                 |            |               |                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|---------------------------------------------------------------|
|                                                                                                                                                 |            |               | addressing all 'strategy and/or management plan requirements. |
| (loss of trees) <b>Capital Asset Value for Amenity Trees (CAVAT) study</b>                                                                      | GWS4.2     |               | Stand-alone, or integrated with the Arboriculture Report      |
| (off-site playspace) <b>Spatial mapping of the 15 minute play space network</b>                                                                 | GWS5.1     |               | Design and access statement                                   |
| <b>Flood Risk Assessment</b>                                                                                                                    | CE7.1      | CE1.1         | Stand alone, as reviewed by EA.                               |
| <b>Overheating Assessment / Good Homes Alliance 'Early Stage Overheating Risk Tool' / Dynamic Thermal modelling overheating risk assessment</b> | CE4.1      | CE1.1         | Energy statement                                              |
| <b>Foundation Works Risk Assessment (FWRA)</b>                                                                                                  | CE1.3      |               | Demolition and Construction Logistics Plan                    |
| <b>Part G Water Efficiency Calculator (Water Research Centre Limited)</b>                                                                       | CE1.5      |               | Energy statement                                              |
| <b>Energy statement</b>                                                                                                                         | CE2        | W4.5          | Stand-alone submission                                        |
| <b>Decarbonisation strategy</b>                                                                                                                 | CE2.6      |               | Energy statement                                              |
| <b>Embodied carbon report</b>                                                                                                                   | CE3.1      |               | Energy statement                                              |
| <b>Circular Economy Statement</b>                                                                                                               | CE3.3      |               | Energy statement                                              |
| <b>Whole Life Carbon assessment</b>                                                                                                             | CE3.5-6    |               | Energy statement                                              |
| <b>Retrofit plan</b>                                                                                                                            | CE5.2-4    |               | Design and access statement or Energy statement               |
| <b>Air quality assessment</b>                                                                                                                   | CE6        | T2.3          | Pollution Management Statement                                |
| <b>Sustainable Water Drainage Strategy / Surface Water Drainage Strategy</b>                                                                    | CE8.4-5    |               | Design and Access Statement or as stand-alone submission.     |
| <b>Servicing and Management Strategy / Servicing and Deliveries Management Plan</b>                                                             | T2.1<br>T4 |               | Transport Assessment                                          |
| <b>Transport Assessment</b>                                                                                                                     | T3         | SI4.5<br>T2.1 | Self-standing document                                        |

|                                                           |      |             |                                                                                                                          |
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| <b>Wayfinding statement or a signage strategy</b>         | T2.2 | D2          | Transport Assessment                                                                                                     |
| <b>Parking Design and Management Plan</b>                 | T3.3 |             | Design and Access Statement or as a stand-alone submission addressing all 'strategy and/or management plan requirements. |
| <b>Travel Plan / Travel Plan Statements</b>               | T3.8 | T5.4<br>HS7 | Stand-alone                                                                                                              |
| <b>Demolition and Construction Logistics Plan</b>         | T4   |             | Self-standing document                                                                                                   |
| <b>Waste operator management plan</b>                     | W2   |             | Planning statement or as a stand-alone submission addressing all 'strategy and/or management plan requirements.          |
| <b>Waste Management Plan</b>                              | W3   |             | Planning statement or as a stand-alone submission addressing all 'strategy and/or management plan requirements.          |
| <b>Utility infrastructure capacity sufficiency</b>        | W4.1 |             | Planning statement or Design and Access Statement                                                                        |
| <b>Odour Impact Assessment and appropriate mitigation</b> | W4.4 |             | Pollution Management Statement                                                                                           |

b) The requirements/assessment are set out in policy in order to aid clarity and consistency. The main policy explains the standards/principles/objectives that the requirement/assessment will demonstrate, while in other policies include cross-references to the assessment(s). We believe this aids implementation, by being clear for applicants what they are required to do and is in line with PPG Paragraph: 018 Reference ID: 26-018-20191001 on assessment frameworks being included in policy.

The requirements/assessment are included directly within the Local Plan because this provides a legally binding and transparent framework for future development, ensuring it is sound and sustainable. Publishing assessments and requirements as a separate, regularly reviewed list would be less effective, as it would not have the same legal weight as the Local Plan, could lead to inconsistencies, and would be less accessible for the long-term planning required for major development.

By embedding assessments into policies, the council gains greater consistency and discretion to respond to proposals and, in turn, can produce decisions that are more robust and less vulnerable to appeal.

FPQ2. Could the Council provide a map of the Borough showing the relevant designated centres and parades along with the specified radii / distances from each.

#### **Council Response:**

Please see mapping provided in Town Centres Network Review Methodology Paper Update 2024 (EB034), Appendix 5:

- Newham's Town Centres Network: established/emerging and future 400m catchments; and
- Newham's Town Centres Network: established/emerging and future 15min walk catchments.

The mapping indicates that, once the full network is delivered, there are very minor parts of the borough that will continue to be not within 15 minutes walking distance of at least two designated centres or parades:

- MOL land to the east of the borough,
- the Beckton Sewage Works and industrial land at Jenkins Lane.
- A small section of existing terraced houses north of Forest Gate Town Centre.

The Council further notes that the intention of this policy is not to limit the location of residential uses, but to direct the location of main town centre uses so that the objective set out in the policy is achieved. This has also been the Council's response to a similar question raised by a developer at Regulation 18 and 19.