

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC WRITTEN STATEMENT

MAIN MATTER 3: SPATIAL STRATEGY

WE ARE NEWHAM.

BFN1 Spatial strategy

Q3.1 Does policy BFN1 set out an appropriate spatial strategy, taking account of reasonable alternatives, in the context of the London Plan? In particular:

- a) Directing significant levels of growth to the six neighbourhoods (N1, N2, N3, N4, N5 and N17) in the Royal Docks and Beckton Riverside Opportunity Area; two neighbourhoods (N6 and N7) in the Poplar Riverside Opportunity Area; and the N8 Stratford and Maryland neighbourhood?
- b) Supporting incremental change in all of the other neighbourhoods (N9 to N16)?

Council Response:

- 1.1 Yes, Policy BFN1 set out an appropriate spatial strategy taking account of reasonable alternatives, which were identified through a formal assessment process as part of the Integrated Impact Assessment (IIA)(SD006, pg. 59-62). Four options relating to the spatial strategy were assessed and the key findings and recommendation set out in Table 5.1 and 5.2 recommended the Council's preferred option. This is because it is consistent with the London Plan 2021, by following a design and character-led approach to where growth can be accommodated, as well as recognising the role of small sites in delivering incremental change. It states that the Council's preferred option ensures the benefits of growth are distributed across the borough in line with council objectives, both through new housing and through services and facilities as part of the 15 minute neighbourhood principle.
- 1.2 The Characterisation Study undertook an analysis of the borough from a multitude of perspectives, including administrative boundaries, function and morphology, and perceptions expressed by the community, Councillors and Officers engaged in the process. This evidence helped identify a series of distinct neighbourhoods (Chapter 6, EB013), each of which has a separate policy set out in Local Plan Part 2 to guide growth at a more local and detailed scale.
- 1.3 Policy BFN1 sets out the spatial distribution of development based on relevant and up to date evidence. The distribution of development proposed in each neighbourhood seeks to promote sustainable patterns of development in accordance with the London Plan 'good growth' objectives (GG1 – GG6) which focused on building strong and inclusive communities, making the best use of land, delivering the homes that London needs and growing the economy whilst maintaining resilience and efficiency.
- 1.4 Policy BFN1 identifies where development will be focused and the amount of change that will occur across the borough, to deliver the Plan's vision and objectives. The policy sets out an appropriate strategy to direct significant level of growth, supported by infrastructure of all types to:
 - the six neighbourhoods (N1, N2, N3, N4, N5 and N17) that include the Royal Docks and Beckton Riverside Opportunity Area ;
 - two neighbourhoods (N6 and N7) including parts of the Poplar Riverside Opportunity Area; and
 - the (N8) Stratford and Maryland neighbourhood that includes parts of the Olympic Legacy Opportunity Area,.

The realisation of the levels of growth outlined in the strategy are linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas are designated in London Plan Policy SD1 as significant locations with development capacity to accommodate new housing, commercial development and infrastructure of all types.

- 1.5 All of the other neighbourhoods (N9 to N16) outside the opportunity areas are located within the urban area on allocated underutilised brownfield sites, the redevelopment of which also accords with the London Plan. Development will also occur in these neighbourhoods through windfall sites, where land is available for development and/or intensification of a suitable scale as identified through the Characterisation Study (2024). Growth in these neighbourhoods will provide locations for homes and employment as well as providing much needed infrastructure, including new open space, health centres and community facilities.
- 1.6 Overall, a key objective underpinning the spatial strategy set out in Policy BFN1 is the delivery of a network of well-connected neighbourhoods, often within a 15 minute walk or cycle, ensuring all residents live within easy walking distance of shops, workplaces, community facilities, parks and civic amenities and that there are sufficient facilities to meet the needs of an increasing population.

Tall Building Zones:

Q3.2 Are the Tall Building Zones listed in policy D4 Table 1 and designated on the policies map, and the “height range maximum” for each, justified and will they be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

Council Response:

- 2.1 Yes. The twenty two (22) tall building zones identified in the Table 1 and in the policies map and their height requirements, cover significant areas of transformation and growth and include 33 site allocations, therefore enabling the delivery of housing developments at the most appropriate capacity and building form that makes efficient use of land, whilst responding to the setting and character of each part of the borough. The tall building strategy also supports industrial intensification in all Strategic Industrial Locations (SILs).
- 2.2 The approach to direct tall building developments above 21m, to the twenty two designated tall building zones is in conformity with the London Plan policy D9 (Tall buildings) part B (2) - which requires boroughs to identify locations where tall buildings may be an appropriate form of development - and part B (3) - which requires to direct tall buildings only in the locations identified as suitable in development plans. Section 4 ‘Flexibility outside tall building zones’ of the Tall Buildings Topic Paper (2025)(TP001) sets out in more details the justification for excluding tall buildings outside tall building zones.
- 2.3 The use of maximum height parameters that are acceptable in the identified tall building zones is also justified and in conformity with London Plan policy D9 requirements. The supporting text 3.9.2 (2) clearly states “in these locations, determine the maximum height that could be acceptable.” The methodology to identify suitable locations for tall building developments and their appropriate heights has been developed in line with the Characterisation and Growth Strategy LPG (2023). Paragraph 4.412 of the LPG suggests defining appropriate heights for each tall building location and to expressed them as maximums to provide greater clarity at the planning application stage. This is explained in detail in section 2 ‘Maximum versus appropriate/indicative heights’ of the Tall Buildings Topic Paper (2025).
- 2.4 Therefore, policy D4 identifies tall building zones, the height that are considered appropriate in those locations and expresses them as maximums. This approach aligns with the London Plan policy D9 supporting text 3.9.2 (2) requirements and with the Characterisation and Growth Strategy LPG (2023) and it is based on a robust tall building assessment evidenced in the Tall

Building Annex (2024) (EB023). The range of building heights (from 32m to 100m), illustrated in the policy map and in Table 1, enables varying building heights within a tall building zone and facilitate the transition from the tall building clusters to the surrounding context, whether a low-rise context or an historic asset. Fig. 3 of the Tall Building Annex shows that the majority of the borough is characterised by low rise to mid-rise context. To ensure that tall buildings can be sensitively integrated with the character of the borough and gradually transition to the existing low-rise context, policy D4 introduces also 'prevailing heights' parameters. As explained in Section 3 'prevailing height parameter' of the Tall Buildings Topic Paper (2025) the introduction of complementary 'prevailing heights' allowed the Council to identify more and larger tall building zones and be more flexible on the location of the tallest element/s within each zone, unless explicitly indicated in Table 1. Prevailing heights also encourage the optimisation of sites through the delivery of a mix of typologies and homes, mid-rise developments integrated with taller elements. The Council considers policy D4 to be positively prepared in line with the process outlined in the Characterisation and Growth Strategy LPG (2023) and to be robustly evidenced in the Tall Building Annex (2024).

- 2.5 The study summarises the high-level sensitivity and suitability assessment undertaken to identify suitable locations for tall buildings. Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. The maximum height permissible in each area are informed by the prevailing heights of the existing and emerging context (when substantially started), the town centre and local centre hierarchy and the level of accessibility.
- 2.6 This townscape approach defines a borough-wide spatial strategy which results from an evaluation of design-led approach considerations in conformity with the London Plan policy D1 (London's form, character and capacity for growth), policy D3 (Optimising site capacity through the design-led approach), as well as NPPF chapter 11 (Making effective use of land) and chapter 12 (Achieving well designed and beautiful places). Section 7 'Supporting optimisation of the site' of the Tall Buildings Topic Paper (2025) outlines in details how Policy D4 responds comprehensively to the requirements of complementary policies and how the inclusion of maximum height parameters doesn't compromise the optimisation of the sites.
- 2.7 The Tall Building Annex (2024) also evidences that, due to their sensitivity, developments in locations outside the identified tall building zones are not considered suitable for developments above 21m. Therefore, developments outside tall building designations are considered suitable for mid-rise developments (below 21m) to make a contribution to meeting Newham's Housing need whilst sensitively integrating with the scale and massing of the existing urban fabric.
- 2.8 In conclusion, the objective of policy D4 is to manage the growth of the borough in a sustainable way, directing tall building developments in areas that are less sensitive and more suitable to tall buildings. This townscape approach helps managing the appropriate built form and scale of development in keep with the character of each location, reducing the impact on the heritage asset, creating clusters of tall buildings that are proportionate to their role within the local and wider context and creating a gradual transition to the sensitive low-rise context.
- 2.9 In relation to viability specifically, the locational and design requirements of the tall building's locations, which are also reflected in the site allocations design principles, are tested feasible and viable through the capacity study and viability assessment. However, policy D4 will work alongside Local Plan policies H3 (Affordable Housing) and BFN4 (Developer contributions and infrastructure delivery), which address how the viability of sites, on a case-by-case basis, will be considered and assessed.

Neighbourhood “enhance” areas

Q3.3 Is policy D3 justified and will the support for a moderate uplift in density in “enhance areas” be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

Council Response:

- 3.1 Yes, Newham is already a primarily dense (and intensifying) borough, as set out in the Characterisation Study Chapter 4: Urban Morphology (EB011).
- 3.2 Policy D3 is intended to provide additional detail about how the design-led approach should be considered in Newham's different built environment contexts and is consistent with London Plan Policy D3. The policy synthesises the findings and recommendations of the Characterisation Study (2022) Chapter 7 (EB014 and EB015), which was developed following the GLA's Characterisation and Growth Strategy LPG process in order to identify character areas suitable for different levels of change, i.e. conserve, enhance and transform areas.
- 3.3 As set out in mapping in the Characterisation Study Chapter 7 at page 153 (EB015), the 'enhance character area' covers the majority of the borough. Nevertheless, this does not mean that there is uniformity in the built form across this area type, but rather a similar level of opportunity for growth. There are a number of site allocations partially or wholly within enhance areas – see table below – where the site allocation policy provides design principles to help optimise each site. However, the majority of 'enhance area' represents unallocated parts of the borough where development will be more incremental, through windfall and small-scale developments. Therefore, in order for the policy to be effective at managing a diversity of contexts and proportionate to the evidence (see maps set out in Characterisation Study Chapter 7, pg. 143-148, EB014), the more flexible terminology of 'moderate uplift in density' is used rather than setting density targets/ranges. This aligns with London Plan Policy D3 Part C.
- 3.4 The NPPF 130 makes it clear that Local Plans should seek to strike the right balance between significantly uplifting residential density in areas well served by public transport and ensuring that increasing density does not result in inappropriate built form wholly out of character with the existing area. The Council believes that the approach set out in policy D3 achieves this balance and, applied alongside other policies of the development plan (including D1 and BFN2), guidance (including the GLA's Optimising Site Capacity: A Design-led Approach LPG) and evidence supporting the Plan (including the Characterisation Study and the Small Sites Intensification Guidance (EB022) where relevant), will be effective at making efficient use of land and maximising housing delivery opportunities. After the adoption of the Plan the Council intends to look at which guidance could be progressed further as supplementary planning guidance or design codes.
- 3.5 'Moderate uplift in density' is used as a flexible way of indicating that growth is expected in enhance areas in a way that responds positively to local conditions and opportunities. Each site will have its own constraints and context that will need specific consideration at planning application stage, and the implementation text clarifies that Design and Access Statements should address all the borough-wide design guidance themes relevant to a 'transform', 'enhance' or 'conserve' character of the site. Nevertheless, the Council propose a modification to the implementation section D3.4, D3.5 and D3.6 to clarify the evidence sources that applicants should draw on in their own assessment of local character and potential for intensification:

All proposals are expected to make efficient use of land available through the designed process. Any Design and Access Statement should address all the boroughwide design guidance themes relevant to a ‘transform’, ‘enhance’ or ‘conserve’ character of the site – **making reference to relevant sections of the Characterisation Study**, demonstrating how they have been addressed and balanced to contribute towards a successful, well integrated, healthy and functional neighbourhood. **Proposals on small sites and/or minor residential developments should also refer to the guidance provided through the Small Sites Intensification Guidance, as well as relevant London Plan guidance.**

Table: Site allocations in part or in full within ‘enhance area’

Neighbourhood	Site Allocation
N5 Custom House	N5.SA3 Custom House Land between Russell Road and Maplin Road
N5 Custom House	N5.SA4 Royal Road
N8 Stratford and Maryland	N8.SA1 Stratford Central (in part)
N10 Plaistow	N10.SA1 Balaam Leisure Centre
N10 Plaistow	N10.SA2 Newham 6th Form College
N10 Plaistow	N10.SA3 Newham Leisure Centre
N10 Plaistow	N10.SA4 Balaam Street Health Complex
N11 Beckton	N11.SA2 Cyprus
N13 East Ham	N13.SA2 East Ham Primark
N13 East Ham	N13.SA3 Former East Ham Gaswork
N14 Green Street	N14.SA1 Shrewsbury Road health complex
N15 Forest Gate	N15.SA1 Lord Lister Health Centre
N15 Forest Gate	N15.SA2 Woodgrange Road West

Q3.4 For policy D3 and relevant N policies to be effective:

- a) Should part 2 of the Plan explain / describe where the “enhance” areas are in each neighbourhood?
- b) Should the policies map illustrate geographically the “enhance” areas?

Council Response:

- 3.6 a) The Council notes that Policy D3 implementation section ‘D3.4, D3.5 and D3.6’ clarifies that the Council intends to apply the ‘transform’, ‘enhance’ and ‘conserve’ character areas flexibly, rather than as part of a designation, in line with the GLA’s Characterisation and Growth Strategy LPG (paragraph 4.2.20). This is because we recognise that character changes over time, and there may also be more fine-grained morphological local conditions that are not captured through the borough-wide assessment of the Characterisation Study. The Council sets out that changes to a site’s character type can be agreed in consultation with the Council at development management stage.
- 3.7 Transform areas primarily address site allocations in opportunity areas and other high growth areas of the borough (including industrial intensification), and are therefore primarily already mapped on the policies map. ‘Conserve’ areas reflect conservation areas and areas of townscape value, which are also mapped on the policies map. Further, as stated in response to Q3.3 above, the ‘enhance’ area covers the majority of the borough, which includes a multitude

of very different contexts, from traditional terraced developments to mixed high streets and more recent mid-rise flatted developments.

- 3.8 The council recognise that, while the plan is to be read and applied in the round, it would aid consistency and clarity for Part 2 (SD002b) to indicate how the 'conserve', 'enhance' and 'transform' character areas are to be identified and applied. We therefore propose that the Neighbourhoods diagram at page 358 be amended to show these areas, and that the following clarification modification be made to the implementation text 4.3 (pg. 359):

The policies provide the vision, design and development principles for each neighbourhood, which will inform and guide development in each neighbourhood. **The Newham Characterisation Study (2024) undertook an analysis of the borough and identified areas with a character suitable to transform, enhance or conserve. These are referenced in the neighbourhood policies where appropriate, and each character area should be developed following a design-led approach in accordance with policy D3.** All applications will be [...]

- 3.9 b) No, the Council does not consider it would be effective for the 'enhance' or the 'transform' and 'conserve' areas to be illustrated on the policies map. As noted above, the character areas are not intended to be designations, and future updates to the Characterisation Study, or relevant masterplanning, may lead to changes to the character type attributed to some areas of the borough. Further, as the 'enhance' area covers the majority of the borough, adding this layer to the policies map may not aid legibility. Instead, the Council propose, as above, to illustrate the areas in Part 2 of the Plan.