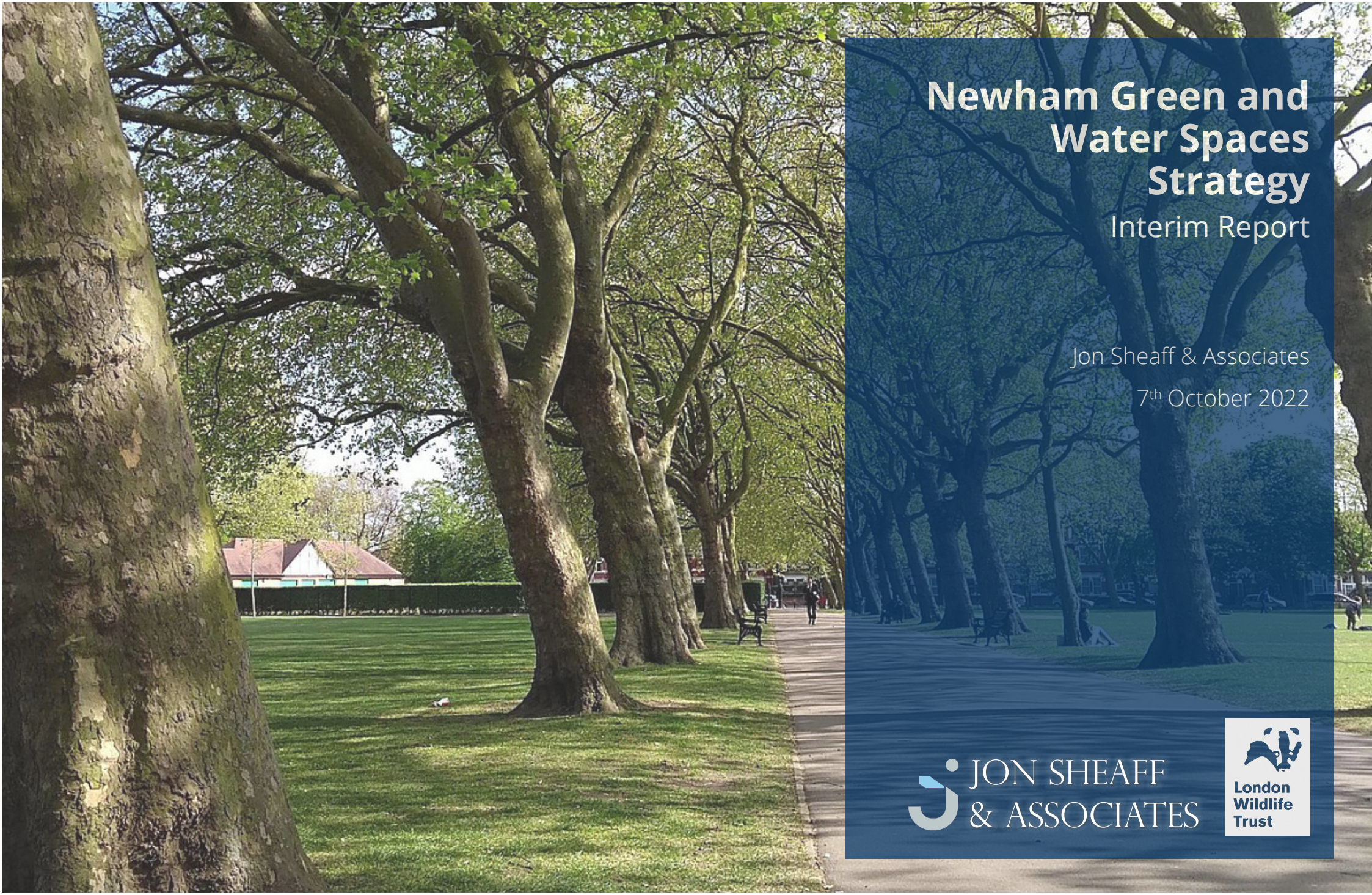

Newham Green and Water Spaces Strategy

Interim Report

Jon Sheaff & Associates

7th October 2022

JON SHEAFF & ASSOCIATES

London Wildlife Trust

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INTERIM REPORT

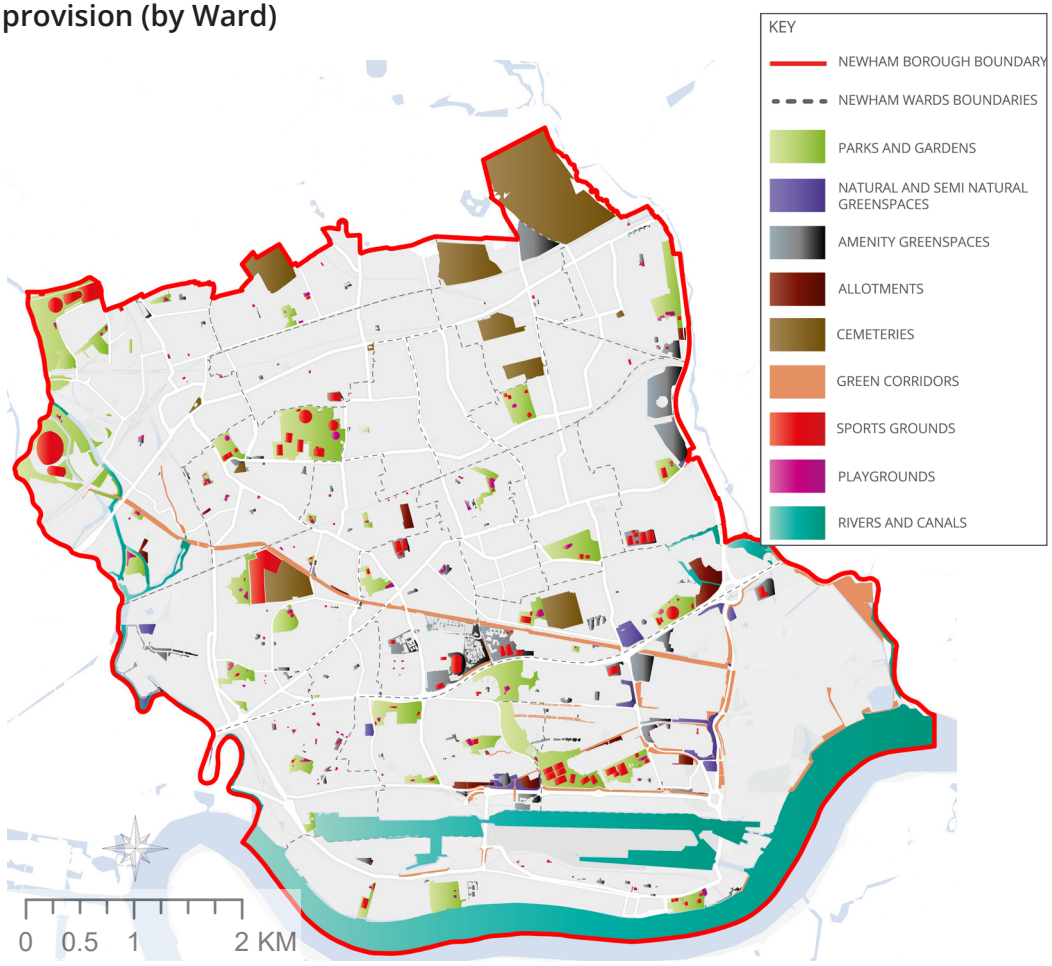
1.0 Introduction

The purpose of this interim report is to form part of the evidence base that will support a forthcoming Council decision to proceed with Regulation 18 consultation for the emerging Local Plan. This report will form part of a wider Green And Water Spaces Strategy for Newham that will be completed during 2022-23.

The focus of this interim report is on the analysis of green and water spaces in Newham and the proposal of standards for provision that will be embedded in the Local Plan. The interim report focuses on the following to achieve this objective:

- Identifying and classifying Newham's green and water space assets
- Analysing demographic trends within Newham as a means of assessing current and future demand for publicly accessible greenspace over the next Local Plan period
- Assessing the provision of greenspace at local level to account for local variations and to respond to local demographic trends
- An assessment of the accessibility of open space of different typologies to identify any geographical deficits in access to different types of open space
- The development of standards for open space of different typologies as a means of ensuring adequacy of supply in the face of demographic change and to justify the protection of green infrastructure assets through planning designations
- Identifying current deficits in provision and deficits in provision in 15 years' time
- Identifying where new open space will be required to address potential deficits in provision
- Surveying and describing a biodiversity baseline, including existing and potential new SINC's
- Current and future deficits in respect of access to nature
- Assessment of potential for Sustainable Alternative Natural Greenspace to relieve pressure on Epping Forest
- Commentary on biodiversity net gain opportunities for Newham

Figure 1.1 - Newham green and water spaces infrastructure – total provision (by Ward)



- Recommendations for Urban Greening Factor policy for Newham
- A review of current Green Belt and Metropolitan Open Land site designations across Newham is being developed. This will include a consideration of additional designations to protect strategically important greenspace. The review will be included in the final Green Infrastructure Strategy and will be considered as part of the Regulation 19 process

1.1 Note on Wards and Neighbourhoods

This report assesses the level of provision of publicly accessible green space across Newham to Ward level, using 2020-based population projections developed by GLA City Intelligence for Newham's pre-2022 Ward boundaries. Newham updated its Ward boundaries in 2022 but demographic data is not currently available for these revised Ward boundaries. As a consequence, provision calculations are not possible for the new Ward boundaries. Calculations can be repeated when demographic data becomes available.

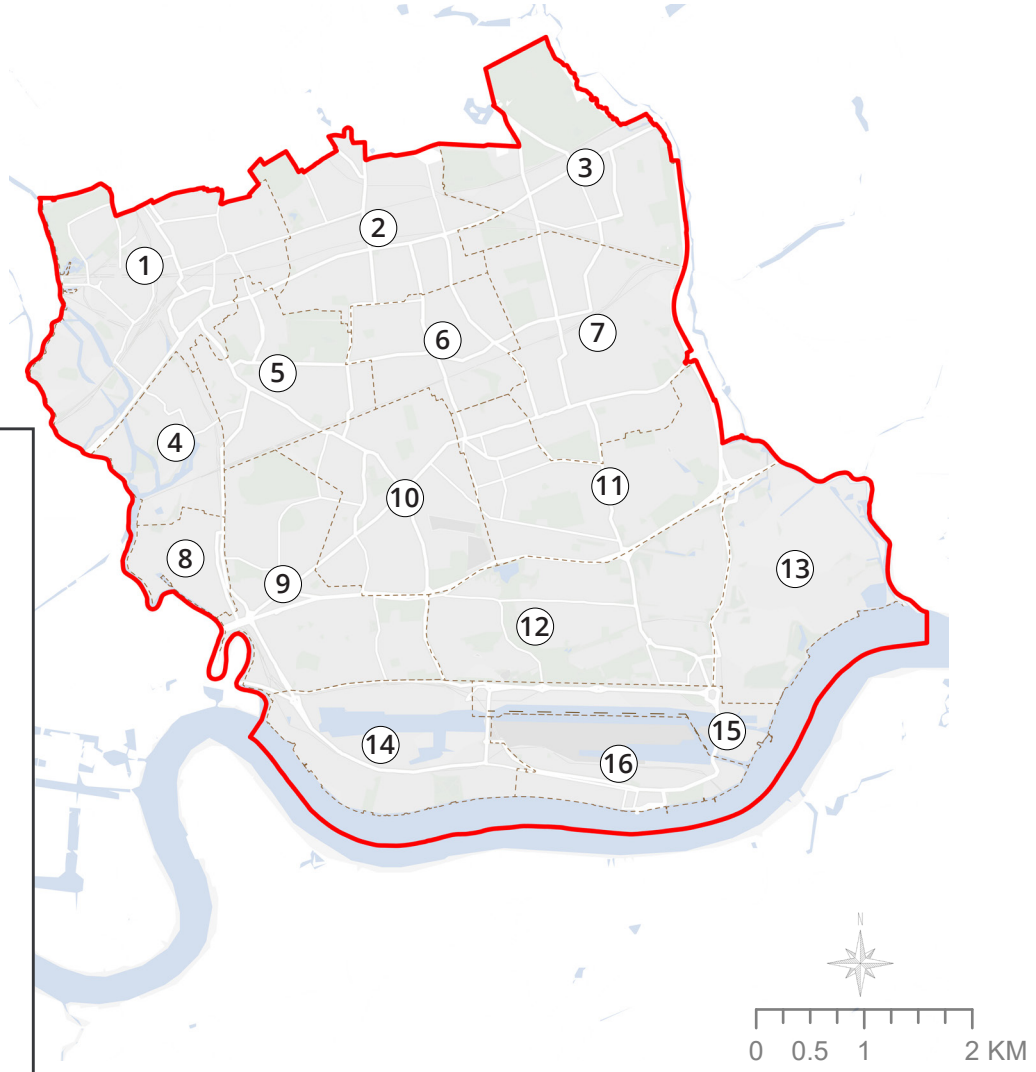
Newham is developing planning policy in respect of '15-minute Neighbourhoods' and has identified 16 Neighbourhoods across the Borough. Demographic data is similarly not available for these Neighbourhoods and calculations in respect of the provision of publicly accessible open space have not been prepared for Neighbourhoods.

Where appropriate, mapping has been provided showing Neighbourhoods and new Ward boundaries to illustrate the distribution of green space assets across these typologies.

NEIGHBOURHOODS

1. Stratford and Mary Town
2. Forest Gate
3. Manor Park and Little Ilford
4. Three Mills
5. West Ham
6. Green Street
7. East Ham
8. Manor Road
9. Canning Town and Custom House
10. Plaistow
11. East Ham south
12. Beckton
13. Gallions Reach
14. Royal Victoria
15. Royal Albert North
16. North Woolwich

Newham's 16 neighbourhoods



1.2 Newham's green and water spaces infrastructure

Classifying Newham's Green and Water Spaces Infrastructure (see also Appendix 2)

An assessment of GIS data provided by Greenspace Information for Greater London CIC (GiGL) has established the total provision of green infrastructure in Newham assigned to the following typologies:

1. Parks and Gardens
2. Amenity greenspace
3. Natural and semi-natural greenspace
4. Water Spaces infrastructure (including rivers and canals)
5. Green corridors
6. Sports facilities
7. Playgrounds
8. Allotments and growing spaces
9. Cemeteries and churchyards

Figure 1.2 - Newham green and blue infrastructure – total provision (by Neighbourhood)

Data has not been provided on the following:

Civic grey spaces
Urban fringe
Housing greenspace / Sites left over after planning
Green roofs
Private gardens
Street trees
Rain gardens

This data suggests that Newham has total open space provision across all typologies of **922.78 Ha**. This figure includes the borough's 308.31 Ha of water spaces as well as its green infrastructure.

In 2022, Newham has a population of 359,093, giving a rate of provision for all open space of **2.57 Ha /1,000 Head of Population (HoP)**.

The population of Newham will increase by just over 27% between 2022 and 2038 to 456,462. If no new open space is created, Newham's rate of provision of all open space will decrease to **2.02 Ha/1,000 HoP**.

2.0 Demographic profile

The population of Newham will increase by just over **27%** between 2022 and 2038 (from 359,093 to 456,462)[1].

2.1 Newham population by Ward

Growth will be concentrated in 5 Wards that will experience population increase that are multiples of the mean growth.

Table 2.1: Newham - major growth Wards 2022-38: mean growth 27.12%

Ward	Population 2022	Population 2038	Percentage increase
Beckton	17,669	37,651	**113.09**
Stratford and New Town	42,048	80,788	**92.13**
Royal Docks	19,438	34,712	**78.58**
Canning Town North	19,022	30,657	**61.17**
Canning Town South	22,586	31,880	**41.15**

By contrast, populations will decrease in 10 Wards

Table 2.2: Newham - Wards with contracting populations 2022-38

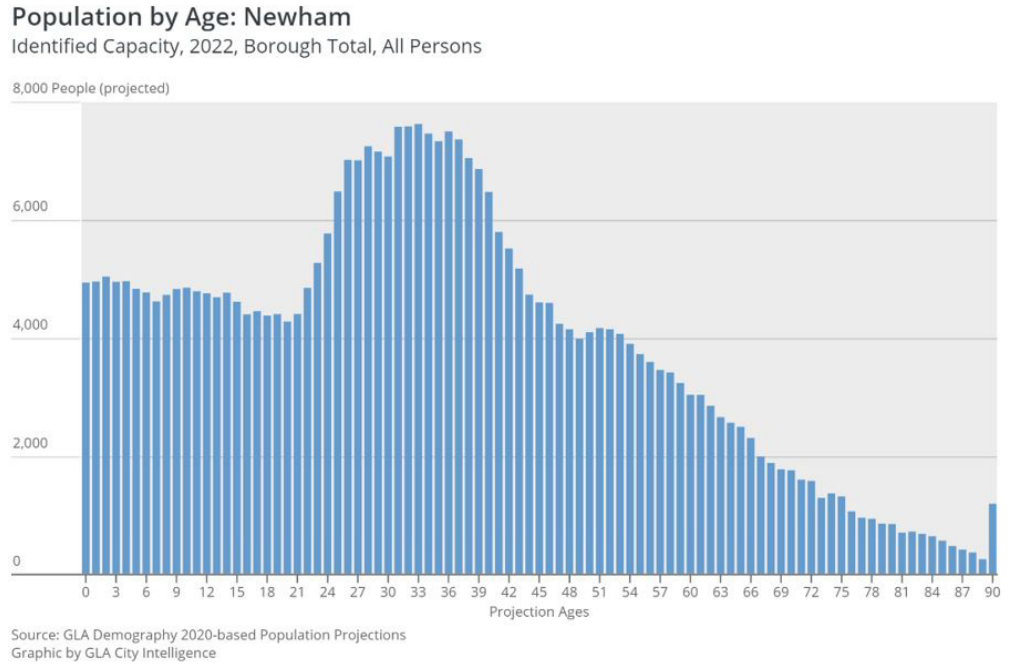
Ward	Population 2022	Population 2038	Percentage increase
Green Street East	16,030	14,795	-7.70
East Ham North	14,277	13,278	-7.00
Forest Gate North	15,846	14,958	-5.60
East Ham South	16,515	15,676	-5.08
Plaistow North	15,684	15,037	-4.13
Manor Park	14,926	14,349	-3.87
Plaistow South	17,587	17,114	-2.69
Green Street West	14,530	14,309	-1.52
Wall End	14,717	14,195	-3.55
Little Ilford	17,115	17,026	-0.52

2.2 Newham population by age

Population by decile will remain relatively stable across the same period. There will be fewer people under 20 living in the borough by 2038 but more people in the 61-80 age bracket.

Table 2.3: Population of Newham by age decile - 2022

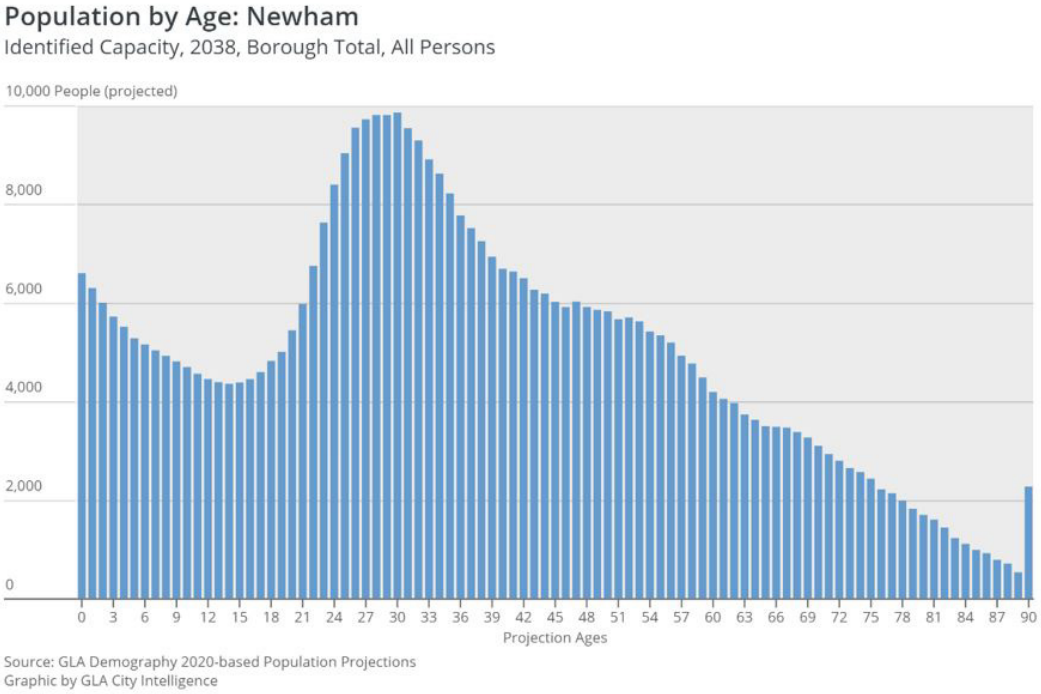
Decile	Total Population	Percentage of total population
0-20	99,046	27
21-40	139,357	37
41-60	90,154	24
61-80	38,257	10
81-90	6,925	2
	359,093	100



[1]https://apps.london.gov.uk/population-projections/

Table 2.4: Population of Newham by age decile - 2038

Decile	Total Population	Percentage of total population
0-20	106,452	24
21-40	167,145	37
41-60	112,393	24
61-80	58,835	13
81-90	11,637	2
	456,462	100



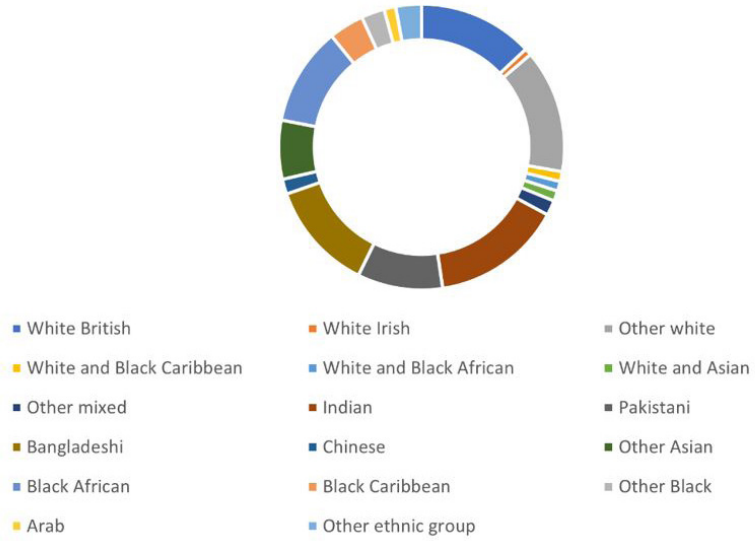
2.3 Newham population by ethnicity

Newham has an extremely diverse population. 65% of the population of Newham is made up of five specific ethnicities:

Newham population by ethnicity 2022

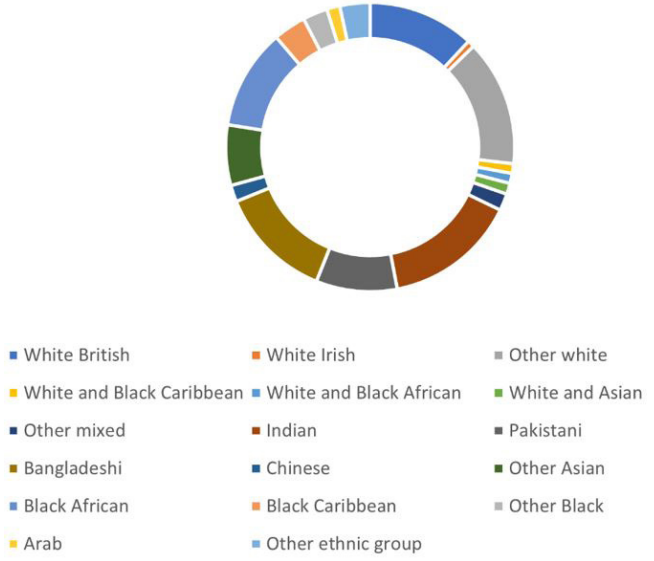
Ethnicity	%'age
White British	**13.00**
White Irish	0.79
Other white	**13.99**
White and Black Caribbean	1.11
White and Black African	1.10
White and Asian	1.17
Other mixed	1.71
Indian	**14.77**
Pakistani	9.66
Bangladeshi	**12.38**
Chinese	1.70
Other Asian	6.66
Black African	**11.13**
Black Caribbean	3.97
Other Black	2.63
Arab	1.33
Other ethnic group	2.91
	100

Newham population by ethnicity 2022



Other mixed	1.89
Indian	**14.82**
Pakistani	9.08
Bangladeshi	**12.80**
Chinese	1.85
Other Asian	6.77
Black African	**11.25**
Black Caribbean	3.64
Other Black	2.78
Arab	1.47
Other ethnic group	3.38
	100

Newham population by ethnicity 2038



Population structure is not projected to change significantly between 2022 and 2038. Amongst the major population segments, the percentage of residents identified as of 'white British' ethnicity will decrease slightly while the segments identified as of 'Other white','Indian', 'Bangladeshi' and 'Black African' ethnicities will all increase slightly.

Ethnicity	%'age
White British	**11.93**
White Irish	0.76
Other white	**14.15**
White and Black Caribbean	1.08
White and Black African	1.12
White and Asian	1.24

2.4 Deprivation

Deprivation is measured in a number of ways. In the 2011 census, households were assessed using four dimensions of deprivation: employment, education, health & disability, and housing. Households were classified as being deprived in none, or 1 to 4 of these dimensions in any combination.

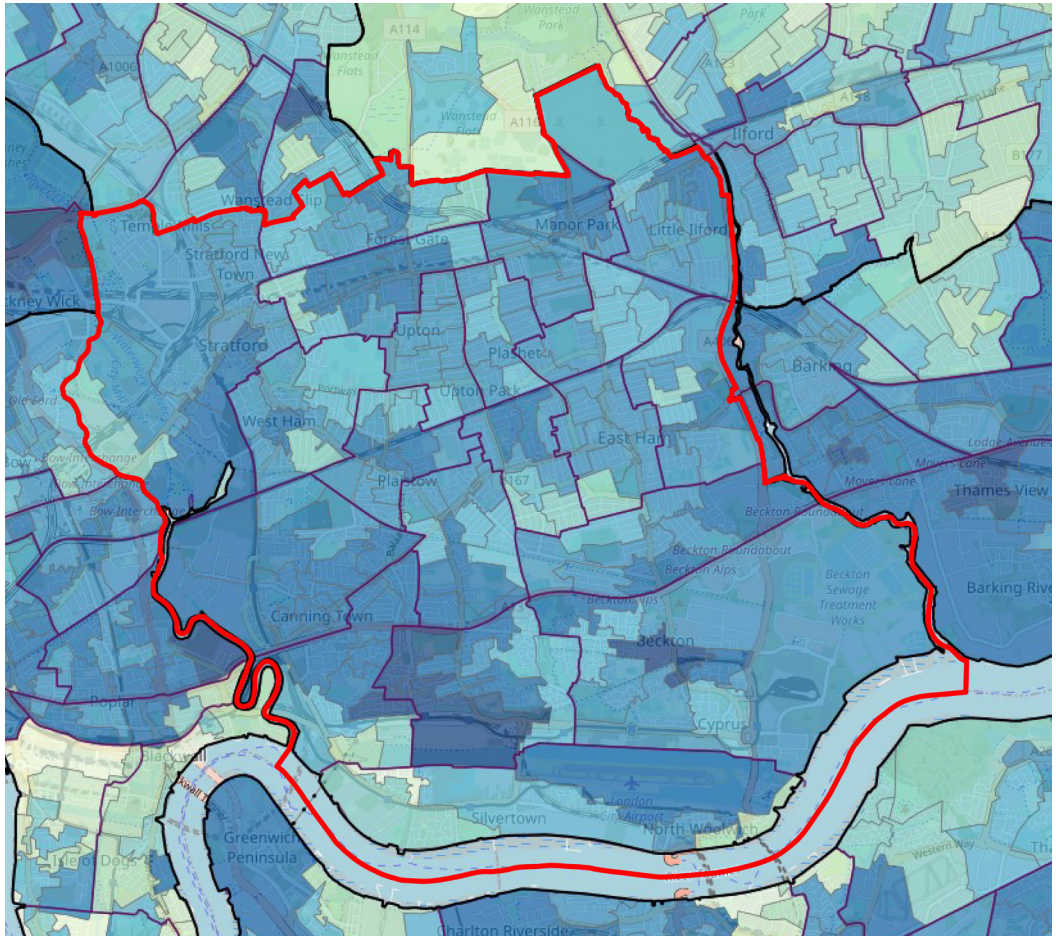
Newham had the lowest proportion of households in England and Wales not deprived in any of the four dimensions. The borough ranked 3rd in its percentage of households deprived in 1 dimension, 10th in 2, 5th in 3 and 8th deprived in all 4 dimensions.

INDEX OF MULTIPLE DEPRIVATION (IMD) There are four main IMD measures through which local authorities may be ranked: average rank, average score, proportion of lower-layer super output areas (LSOAs) in the most deprived 10% nationally, and extent.

- Average rank: all 32,844 LSOAs in England are ranked in terms of deprivation, and the population-weighted average LSOA rank in each local authority district is calculated. Under this measure, a highly polarised local authority would score less highly than a more uniformly deprived one.
- Average score: the population-weighted average LSOA deprivation score in each local authority district is calculated. Polarised local authorities tend to score more highly under average score than under average rank.
- Proportion of LSOAs in the most deprived 10%: this measure is concerned only with the most deprived LSOAs. A local authority district with no LSOAs in the most deprived 10% would be scored – and ranked – 0.
- Extent: the proportion of a local authority district's population living in the most deprived 30% of LSOAs (bottom 10% weighted 1, 11-30% given a sliding weight from 0.95-0.5). This is more sophisticated than the above measure.

Measure	2015	2019
IMD rank of average rank	8	12
IMD rank of average score	23	43
IMD rank of proportion of LSOAs in most deprived 10%	103	154
IMD rank of extent	25	67

Figure 2.1 - Newham indices of multiple deprivation 2019



Under every measure, Newham became relatively less deprived between 2015 and 2019. However, IMD rankings are relative measures, which do not preclude the possibility that Newham may have become more deprived overall despite becoming less deprived by comparison with other local authority areas.

2.5 Implications for green infrastructure provision and service uptake

Over the next 25 years, Newham's population will increase by 27%, implying a need for increased provision of green infrastructure to meet demand for greenspace and a continued flow of ecosystem services for an increasing population. Newham's parks provide a range of ecosystem services, including climate change resilience, biodiversity and ecological connectivity. Some of this new provision can be provided through planning requirements in respect of housing growth.

The population of Newham will become increasingly concentrated in five growth Wards (Beckton, Stratford and New Town, Royal Docks, Canning Town North, Canning Town South). Most of this new population will be accommodated in high density housing that will not include the provision of private greenspace. The provision of an adequate supply of greenspace in response to this increase in population will thus be a significant objective for the emerging Local Plan in response to Paragraphs 92c, 93a and 98 of the NPPF.

Ten Wards across Newham will experience declines in overall populations between 2022 and 2038. Where current greenspace provision in these Wards exceeds Newham's overall provision standard, provision could be characterised as surplus to requirements. However, given the significant demographic pressure that the borough will experience, Newham is not at all likely to have an overall surplus of greenspace provision over the next Local Plan period. Greenspace provision is not likely to be comprehensively located within standard London Plan catchments for accessibility; an issue that will increase as the population grows. A key objective for the borough could therefore be to create better connectivity between green infrastructure assets to address local deficits in provision. This approach will also provide a biodiversity dividend in providing enhanced connectivity for habitats and species across the borough.

More detailed analysis of current provision will assess the likely deficit of provision across different green infrastructure typologies and propose how these are to be addressed. This analysis will be developed in the next phase of the strategy. Please also see the list of typologies to be analysed, in section 1.1.

Newham's population is extremely diverse and research suggests that the uptake of greenspace services can be influenced by cultural factors. Social greenspace benefits (health, education, community cohesion, sense of place) should be enjoyed generally across the whole of Newham's population. Policy for greenspace provision across Newham should acknowledge the influence of cultural factors over the uptake of greenspace services so that excluded or self-excluding population segments enjoy the social benefits of greenspace to the same extent as segments that traditionally consume these services.

3.0 Quantity of open space

3.1 Total open space provision

The data provided by GiGL as analysed in Section 2.0 suggests that Newham has total open space provision across all typologies of 922.78 Ha. This figure includes the borough's 332.89 Ha of blue infrastructure as well as its green infrastructure. In 2022, Newham has a population of 359,093, giving a rate of provision for all open space of 2.57 Ha 1,000 Head of Population (HoP).

The population of Newham will increase by just over 27% between 2022 and 2038 to 456,462. Assuming that provision remains the same (i.e. current provision is sustained and no new greenspace or water sites are added or created) open space provision across the Borough in 2038 will be 2.02 Ha/1,000 HoP.

The calculation of overall open space provision is useful in that it acknowledges the importance of green and blue space in providing a range of ecosystem services including biodiversity connectivity, carbon sequestration, air quality moderation, urban warming mitigation, flood risk attenuation and soil structure quality irrespective of public accessibility.

3.2 Publicly accessible greenspace provision

In the context of planning policy, public accessibility is an important factor in determining the value of a greater range of ecosystem services including health and recreational value.

Data provided by GiGL suggests that Newham has 254.72 Ha of publicly accessible greenspace consisting of:

Parks and Gardens (40 sites):	191.33 Ha
Amenity greenspace (61 sites):	24.06 Ha
Natural and semi-natural greenspace (8 sites):	12.61 Ha
Sports facilities (102 sites):	26.72 Ha

In 2022, Newham has a population of 359,093. Current publicly accessible greenspace provision in Newham is thus **0.71 Ha/1,000 HoP**.

The population of Newham will increase by just over 27% between 2022 and 2038 to 456,462.

Assuming that provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites area added) publicly accessible greenspace in Newham will be **0.56 Ha/1,000 HoP in 2038**.

To sustain provision at the 2022 standard until 2038 would require the creation of 70Ha of additional publicly accessible greenspace.

As detailed in Section 2.1, population growth in Newham between 2022 and 2038 will be concentrated in 5 'growth Wards'.

Beckton
Stratford and New Town
Royal Docks
Canning Town North
Canning Town South

Current provision of publicly accessible greenspace significantly across these five Wards. Beckton is relatively well-endowed with publicly accessible greenspace, with a rate of provisions significantly above the Borough average of 0.71 Ha/1,000 HoP. Canning Town is relatively poor endowed with a rate of provision well below the Borough average.

The impact of demographic change on provision is to reduce levels of provision to below the current Borough average. The exception is Beckton which will continue to enjoy above average provision. Should demographic change in Beckton exceed current GLA projections, publicly accessible greenspace provision could fall below the current standard.

Table 3.1 Publicly accessible greenspace provision – 5 'growth Wards'

As detailed above demographic change within Newham between 2022 and 2038 will be concentrated in 5 Wards. **Newham - major growth Wards 2022-38: mean growth 27.12%**

Ward	Population 2022	Population 2038	Publicly accessible Greenspace provision (Ha)	Provision/1,000HoP 2022	Provision/1,000HoP 2038
Beckton	17,669	37,651	39.433	2.23	1.04
Stratford and New Town	42,048	80,788	46.890	1.11	0.58
Royal Docks	19,438	34,712	15.699	0.81	0.45
Canning Town North	19,022	30,657	22.357	1.18	0.73
Canning Town South	22,586	31,880	4.718	0.21	0.15

An assessment of the remaining 15 Wards confirms the low level of provision of public accessible greenspace across the borough. Only three Wards (Custom House, East Ham South and West Ham) have above average provision. The deficit in provision is to an extent moderated by the increases in population in 8 Wards (East Ham North, Forest Gate North, Green Street West, Little Ilford, Manor Park, Plaistow North, Plaistow South and Wall End). One Ward (Green Street East has no publicly accessible greenspace provision for a 2022 population of in excess of 16,000.

Table 3.2: Greenspace provision by Ward non 'growth Wards'

Publicly accessible greenspace provision by Ward in 2022 and 2038 compared with borough average

Ward	Pop 2022	Pop 2038	PAG (Ha)	Provision/1,000 HoP 2022	Above/below 2022 borough average (0.71Ha)	Provision/1,000 HoP 2038	Above/below 2022 borough average (0.71Ha)
Boleyn	17,981	18,979	2.78	0.15	0.56	0.15	0.56
Custom House	13,421	15,600	28.68	2.13	1.42	1.84	1.13
East Ham Central	16,655	20,219	9.49	0.57	0.14	0.47	0.24
East Ham North	14,277	13,278	7.52	0.52	0.19	0.57	0.14
East Ham South	16,515	15,676	13.91	0.84	0.13	0.89	0.18
Forest Gate North	15.85	14.96	1.90	0.12	0.59	0.13	0.58
Forest Gate South	17,467	18,675	0.05	0.0028	0.71	0.003	0.71
Green Street East	16,030	14,795	0.00	0.00	0.00	0.00	0.00
Green Street West	14,530	14,309	0.61	0.042	0.67	0.043	0.67
Little Ilford	17,115	17,026	10.38	0.606	0.1	0.61	0.1
Manor Park	14,926	14,349	8.31	0.56	0.15	0.57	0.14
Plaistow North	15,684	15,037	2.11	0.14	0.57	0.14	0.57
Plaistow South	17,587	17,114	4.86	0.28	0.43	0.28	0.43
Wall End	14,717	14,195	3.10	0.21	0.5	0.22	0.49
West Ham	15,612	16,527	30.26	1.93	1.22	1.83	1.12

4.0 Accessibility of publicly accessible greenspace (see also Appendix 1)

Planning policy references standards in respect of the accessibility of publicly accessible greenspace. Accessibility is usually defined either in respect of the physical distance from the edge of a greenspace or the walking distance to a greenspace. Accessibility is also usually defined by the physical size of a site and the greenspace typology by which it is characterised.

For the purpose of this report, the typologies and accessibility thresholds for these typologies are as defined in Policy 7.18 of the London Plan 2021.

Table 4.1: Greenspace typologies and accessibility thresholds: - Parks and Gardens

Category	Sub-category	Size (Ha)	Accessibility catchment (kms)
Parks and Gardens	Regional	400 +	3.2 +
	Metropolitan	60-400	3.2
	District	20-40	1.2
	Local	2-20	0.4
	Small	0.4-2	<0.4
	Pocket	<0.4	<0.4
	Linear	Varies	N/A

Newham's parks and gardens have been categorised in conformity with this policy.

The calculations in respect of publicly accessible greenspace set out in Section 3 include other typologies, some of which have accessibility thresholds defined in planning policy (natural and semi-natural greenspace) others do not (amenity greenspace and outdoor sports facilities).

Table 4.2: Greenspace typologies: other publicly accessible greenspace typologies

Category	Sub-category	Size (Ha)	Accessibility catchment (kms)
Natural and semi-natural	N/A	Varies	1 km
Amenity	N/A	N/A	No standard
Outdoor sports facility	N/A	N/A	No standard

For playgrounds, the Six Acre Standard developed by Fields in Trust is a commonly used point of reference. This standard proposes three typologies for play sites (Local Area for Play, Local Equipped Area for Play and Neighbourhood Equipped Area for Play: LAP, LEAP NEAP). Each of these typologies has an accessibility threshold.

Newham's playgrounds have been categorised in conformity with this policy.

Table 4.3: Playground accessibility thresholds

Category	Sub-category	Size (Ha)	Accessibility catchment (kms)
Playground	LAP	0.01	0.1
	LEAP	0.04	0.4
	NEAP	0.1	1

Allotments and growing sites do not have a specific accessibility threshold. The National Allotment Society has proposed a threshold that can be adopted as a standard.

Table 4.4: Allotment accessibility thresholds

Category	Sub-category	Size (Ha)	Accessibility catchment (kms)
Allotment	N/A	N/A	0.5

The accessibility thresholds set out above have been used to determine the catchments for different typologies of open space across Newham. By mapping catchments, it is possible to identify areas of the borough with poor levels of provision of publicly accessible greenspace of different typologies. This analysis can influence decision-making around the designation of specific sites (e.g. the designation of an open space site in an area with a significant under-provision might need to be amended to provide a greater level of protection from development).

Accessibility can be influenced by significant physical barriers; a major road or rail corridor can influence accessibility of individual open spaces. Accessibility thresholds have been moderated to take account of the barriers to accessibility presented by major road and rial corridors and waterways.

Figure 4.1 show the composite accessibility of all of the typologies that constitute provision of publicly accessible greenspace across Newham, adjusted for the influence of accessibility barriers

This suggests that Wards across the north-east of the Borough (Forest Gate North, Manor Park and Little Ilford) across the east of the Borough (parts of East Ham North, Wall End East Ham South and Beckton), the south of the borough (Parts of Royal Docks and Custom House) and the centre of the borough (Plaistow South and Canning Town South) have poor levels of accessibility to all typologies of publicly accessible greenspace.

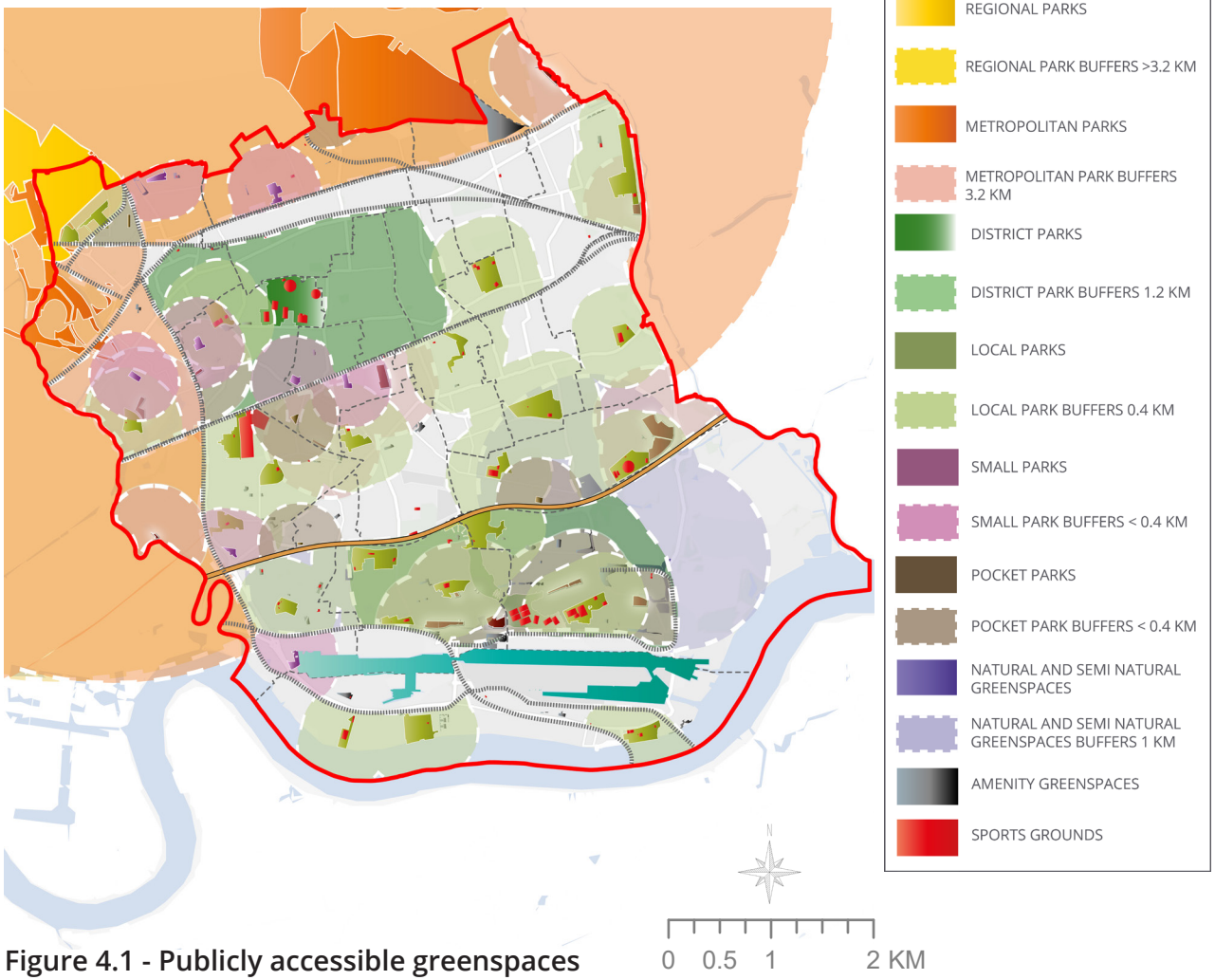


Figure 4.1 - Publicly accessible greenspaces

Appendix 1 Figures 4.1 and following analyse the provision of individual greenspace typologies of greenspace. These suggest the following deficiencies in provision:

Table 4.5: Deficiency in access to publicly accessible parks and gardens by typology by Ward (pre-2022)

Category	Sub category	Under-provided Wards (pre-2022)
Parks and Gardens	Regional	All Wards other than parts of Stratford and New Town, Manor Park, Little Ilford and Canning Town North
	Metropolitan	All Wards other than parts of Stratford and New Town, Manor Park, Little Ilford, Canning Town North and Canning Town South
	District	All Wards other than West Ham, Green Street West and parts of Stratford and New Town, Forest Gate South, Green Street East, Custom House and Beckton
	Local	Forest Gate North, Forest Gate South, Green Street West and parts of Beckton, Stratford and New Town and Canning Town North
	Small	All Wards apart from parts of Stratford and New Town, Forest Gate North, West Ham, Plaistow North , Canning Town North and Canning Town South
	Pocket	All Wards apart from parts of Stratford and New Town, Plaistow North,Canning Town North, Canning Town South and East Ham South

Table 4.6: Deficiency in access to natural and semi-natural greenspace by Ward (pre-2022)

Category	Sub category	Under-provided Wards (pre-2022)
Natural and semi-natural	N/A	All Wards other than parts of Beckton, Custom House, Canning Town South East Ham South Wall End, East Ham Central and Boleyn

In respect of playground provision, there are areas of deficit in respect of the overall levels of provision across all typologies in Beckton, Manor Park and parts of Little Ilford, Wall End, Canning Town North and Stratford Olympic.

In respect of specific play typologies, there are deficits in provision in the following Wards.

Table 4.7: Deficiency in access to playgrounds of different typologies by Ward (pre-2022)

Category	Sub category	Under-provided Wards (pre-2022)
Playground	LAP	Custom House, East Ham Central, East Ham North, Green Street East, Green Street West and West Ham
	LEAP	Boleyn, East Ham Central, East Ham South, Green Street West, Green Street East and Manor Park
	NEAP	None

The borough is relatively under-provided with allotment and food growing capacity.

Table 4.8: Deficiency in access to allotment by Ward (pre-2022)

Category	Sub category	Under-provided Wards (pre-2022)
Allotment	N/A	East Ham Central, East Ham North, Forest Gate North, Forest Gate South, Green Street East, Green Street West, Manor Park and Royal Docks

5.0 Open space standards - parks, play and allotments

5.1 Publicly accessible greenspace standards

Setting a greenspace standard for Newham must reflect the current level of provision across the borough of publicly accessible greenspace and the Borough's demographic trajectory.

Rates of provision of publicly accessible greenspace provision in Newham are low compared to neighbouring local authorities. Barking and Dagenham has a current rate of provision of approximately 2.6 Ha/1,000 HoP. Redbridge has a current provision of 2.27 Ha/1,000 HoP.

Setting a standard above the limited level of current provision will present challenges in a densely populated borough. Setting a standard of 0.75 Ha per/1,000HoP would imply the need for the creation of 93 Ha of additional publicly accessible greenspace by 2038.

Table 5.1: Publicly accessible greenspace provision requirements: 2022 and 2038

Possible standard	2022 requirement	Increase in provision	2038 requirement	Increase in provision
0.71 Ha/1,000 HoP	254 Ha	0 Ha	324 Ha	70 Ha
0.75 Ha/1,000 HoP	269 Ha	15 Ha	342 Ha	88 Ha

5.2 Growth Wards across Newham

As described in Section 2.1, population growth across Newham between 2022 and 2038 will be concentrated in 5 Wards:
Beckton
Stratford and New Town
Royal Docks
Canning Town North
Canning Town South

The impact of demographic change on provision is to reduce levels of provision to below the current Borough average. The exception is Beckton which will continue to enjoy above average provision.

Table 5.2 sets out the additional amount of publicly accessible greenspace that would have to provided to reach the current standard (0.71 Ha) and the enhanced standard (0.75 Ha) respectively.

Table 5.2: Additional publicly accessible greenspace required to meet proposed provision standards (0.71Ha and 0.75 Ha)

Ward	0.71 Ha standard additional provision required - 2022	0.71 Ha standard additional provision required - 2038	0.75 Ha additional provision required - 2022	0.75 Ha additional provision required - 2038
Beckton	0 Ha	0 Ha	0 Ha	0 Ha
Stratford and New Town	0 Ha	10.47Ha	0 Ha	13.70 Ha
Royal Docks	0 Ha	8.95 Ha	0 Ha	10.34Ha
Canning Town North	0 Ha	0 Ha	0 Ha	0.63 Ha
Canning Town South	11.32 Ha	17.91 Ha	12.22 Ha	19.19 Ha

5.3 Play provision

Newham has 84 publicly accessible playgrounds with a total area of 9.01 Ha.

Using the Fields in Trust Six Acre Standard, these can be assigned to the following typologies:

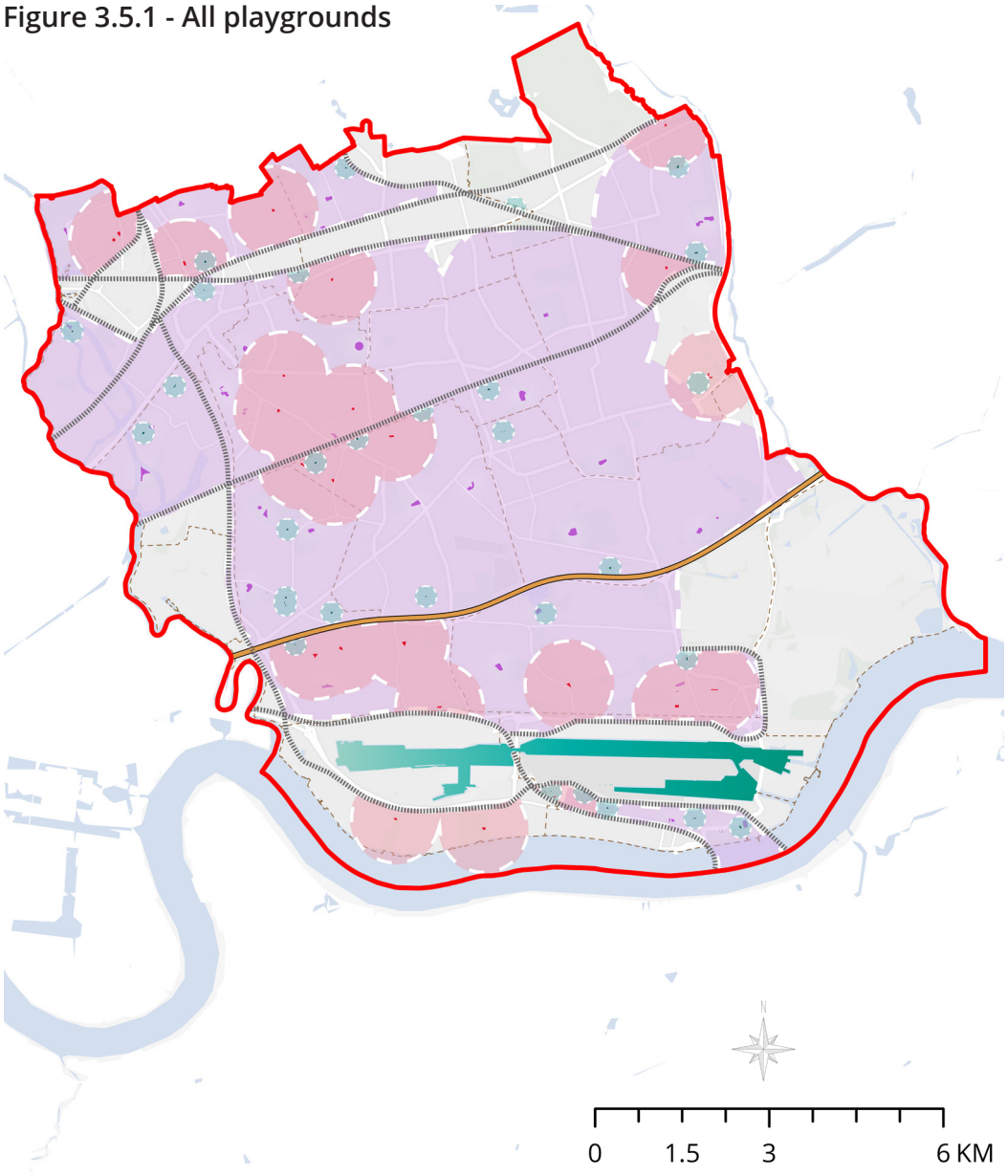
LAP (31 sites):	0.66 Ha
LEAP (24 sites):	1.55 Ha
NEAP (29 sites):	6.8 Ha

Fields In Trust recommends a standard of 0.25 Ha/1,000 HoP for playgrounds. Newham currently provides 9 Ha of publicly accessible playgrounds for a population of 359,093 – a rate of provision of **0.025 Ha/1,000 HoP**. This represents a shortfall of **80 Ha** against the Six Acre Standard of 90 Ha.

As Newham's population increases to 456,462, current provision will equate to **0.019 Ha/1,000 HoP**. To achieve the standard in 2038 will require the creation **105 Ha** of new playspace.

Some of the identified play provision deficiencies in Newham could be addressed through additional provision on existing greenspace.

Figure 3.5.1 - All playgrounds



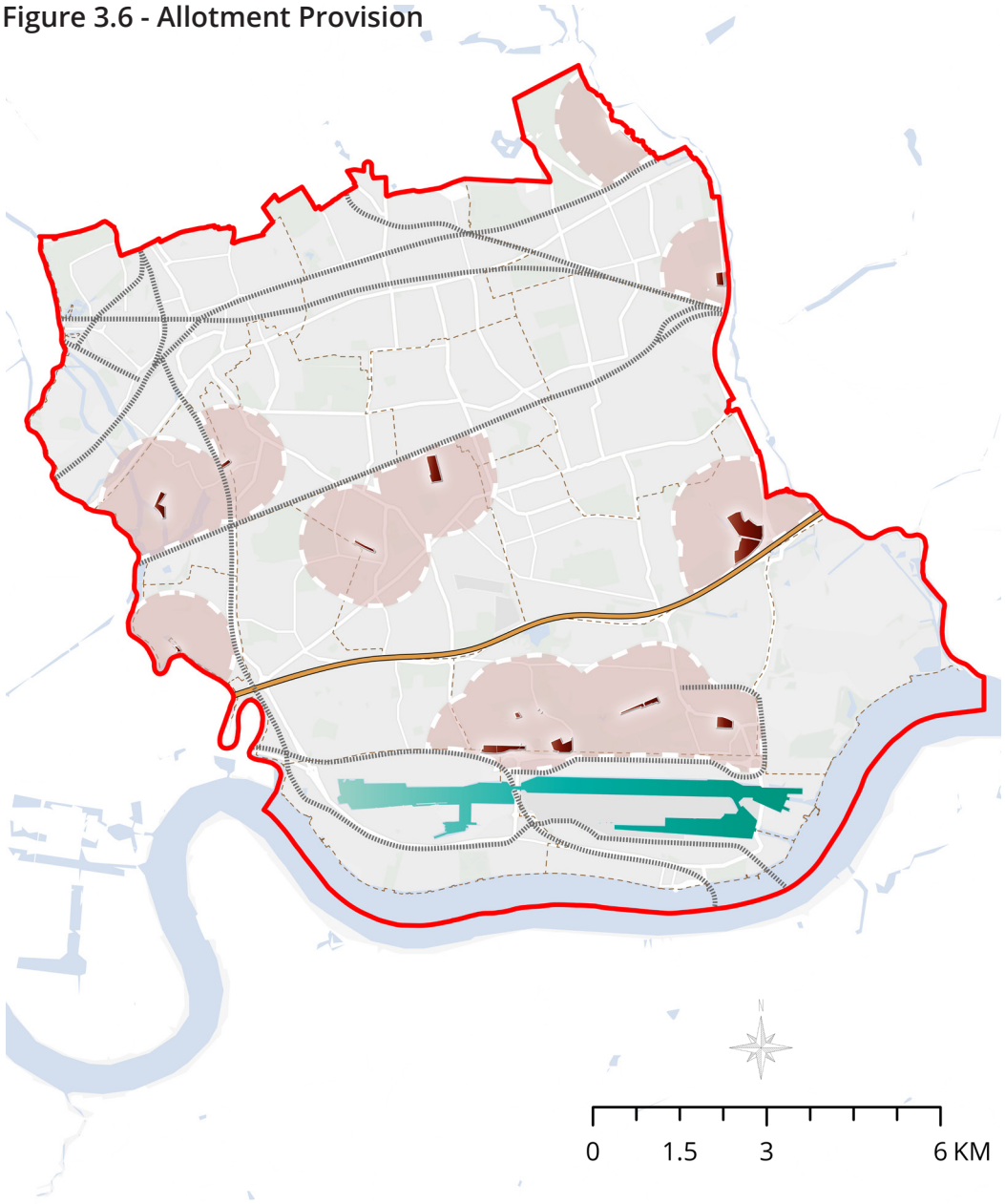
5.4 Allotments and growing spaces

Newham has 14 allotment and growing area spaces with a total area of 16.81 Ha. The National Allotment Society recommends the provision of 0.125 Ha/1,000 HoP. Newham currently provides **0.047 Ha/1,000 HoP**. As Newham's population increase to 456,462, the rate of provision will decrease to **0.037 Ha/ 1,000 HoP**.

Both the current and projected rates of provision are below the standards recommended by the National Allotment Society.

Some of this additional provision can be provided on existing open space but N.B. this will reduce the amount of park
space overall.

Figure 3.6 - Allotment Provision



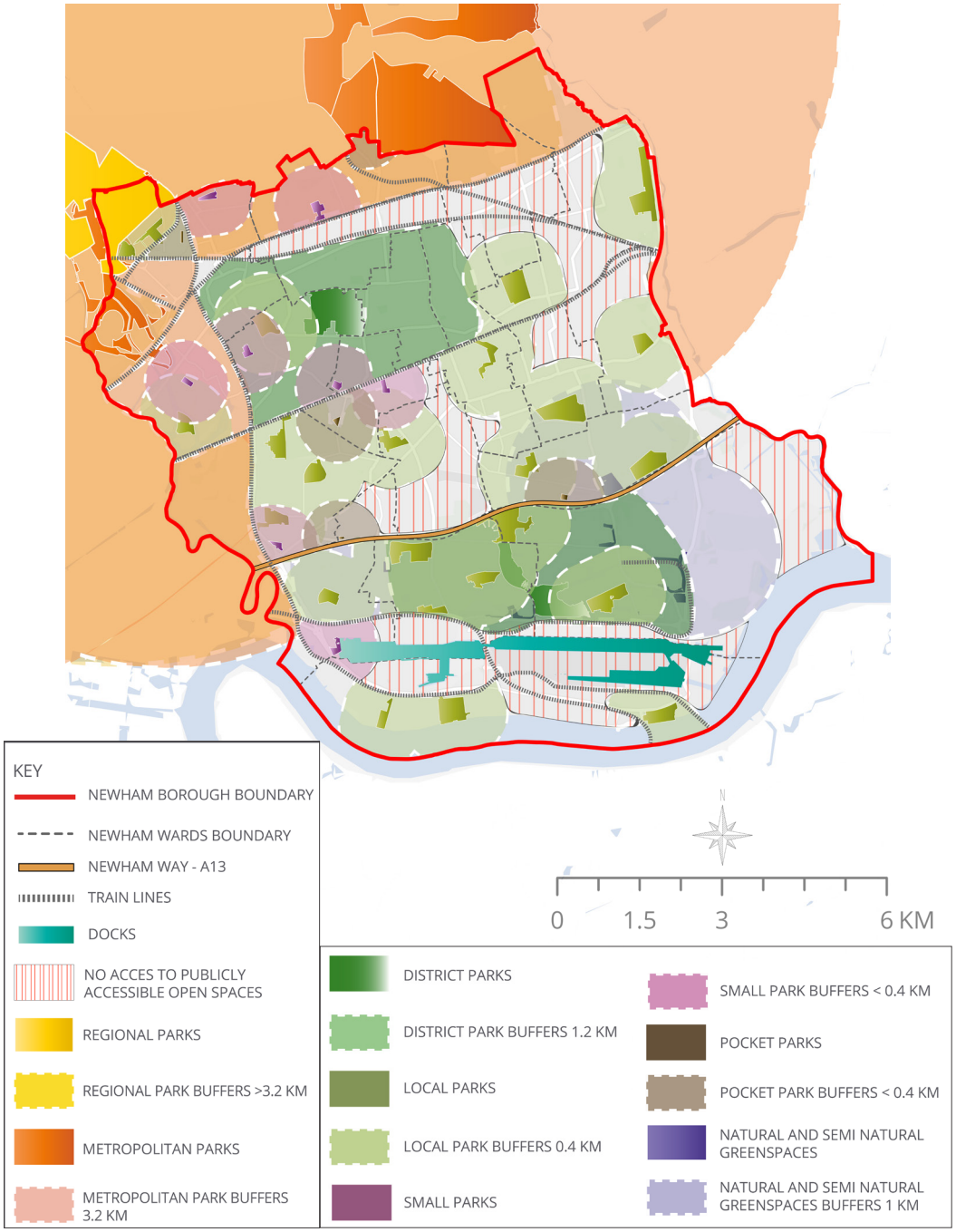
6.0 Current deficits (see Maps 4.1 to 4.5 in Appendix I)

Sections 4 and 5 identify current levels of provision for different typologies of publicly accessible greenspace and the Wards (pre-2022) where there are deficits of provision for each typology. An ideal scenario would be an even and consistent geographical spread of different typologies across the Borough. In Newham, there are significant area of the Borough where there are significant deficits in each typology.

Section 5 also identifies Wards where there is a deficit of provision of publicly accessible greenspace of any typology. These areas are predominantly along the northern edge of the Borough (parts of Forst Gate North, Manor Park, Little Ilford, East Ham North, Wall End and East Ham Central) in the centre of the Borough (predominantly in Plaistow South) and across significant areas of Beckton.

Table 5.2 identifies the major growth Wards across the borough and amount of greenspace needed to achieve the two possible provision standards (0.71 Ha/ 1,000 HoP and 0.75 Ha/1,000 HoP) in 2022 and in 2038. With the exception of Canning Town South, all of the growth Wards achieve both the 0.71 Ha standard and the 0.75 Ha standard. However, all growth Wards have deficiencies in respect of access to specific typologies:

- Stratford and New Town a deficiency access to Natural/semi-natural greenspace provision
- Canning Town North has a deficiency access to District Park and Natural/ semi-natural greenspace provision
- Canning Town South has a deficiency in access to Pocket Park provision
- Royal Docks has a deficiency in access to Regional Park, Metropolitan Park, District Park, Pocket Parks, and Natural/semi-natural greenspace provision
- Beckton has a deficiency in access to Regional Park, Metropolitan Park, Small Park, and Pocket Park provision



7.0 Identifying requirements for new open space

As Table 5.2 shows, the impact of demographic change on the Growth Wards between 2022 and 2038 will create significant deficits in overall provision within four of these Wards. Only Beckton will has sufficient provision overall to sustain the 0.71 Ha and 0.75 Ha standards over this period.

The impact of housing growth on publicly accessible greenspace will be to increase levels of demand on current provision. This needs to be offset by additional provision within housing allocation sites. Spatial capacity for new provision is likely to be limited to the following typologies:

Small: 0.4-2.0 Ha
Pocket: <0.4 Ha

Existing planning permissions or submissions for housing allocation sites within the growth Wards include the following in respect of publicly accessible greenspace, playgrounds and allotments:

Data to be added at a later date once assessment of current applications completed

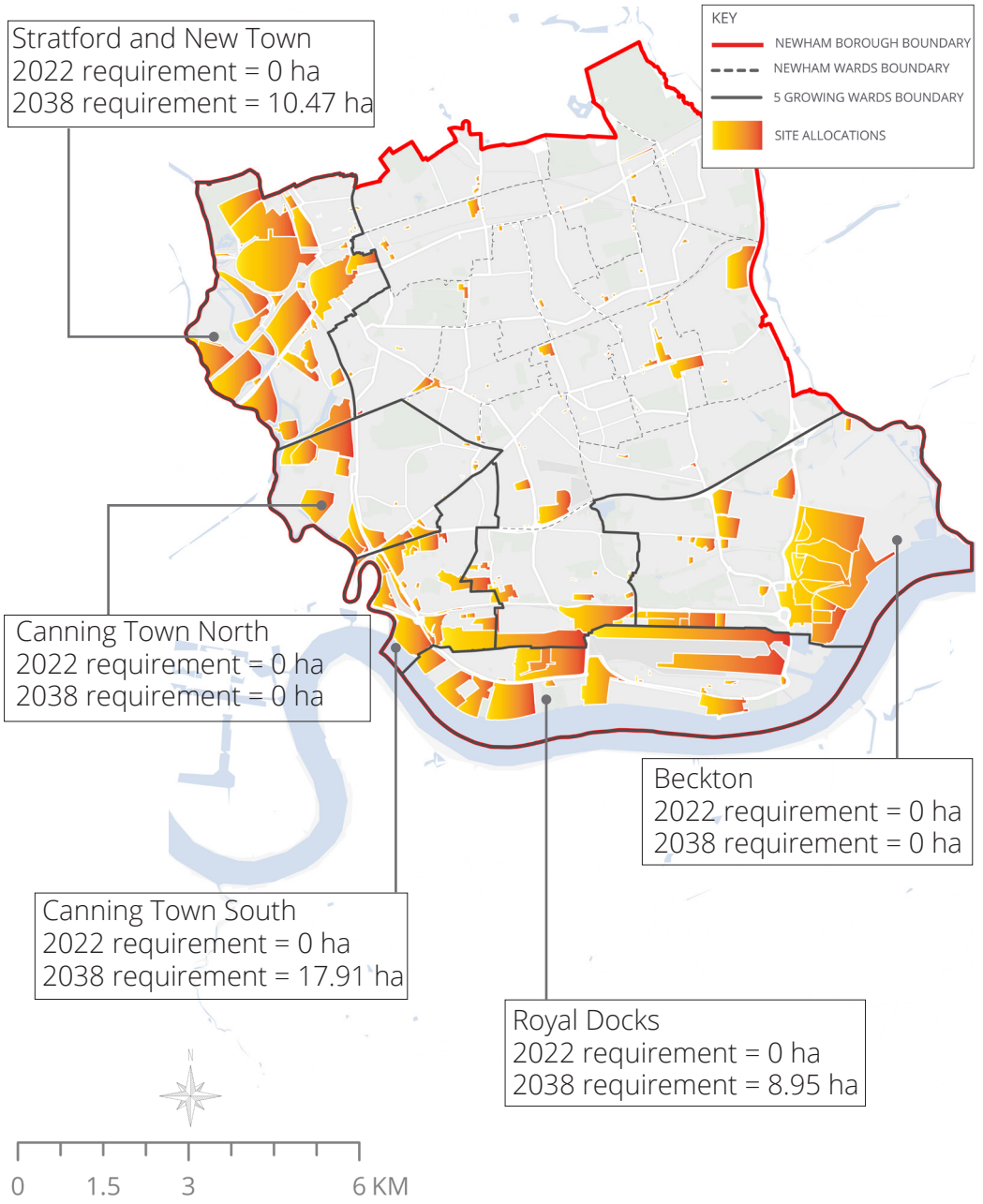
Stratford New Town:
Canning Town North:
Canning Town South:
Royal Docks:
Beckton:

Taking this planned provision of greenspace into account and to meet the overall provision standard for publicly accessible greenspace, the following new provision of greenspace should be planned for each respective growth Ward:

Data to be updated once assessment of current applications completed and netted off

Stratford New Town: 2 Small Parks of 2 Ha and 6 Pocket Parks of 0.4 HA
Canning Town North: 2 Small Parks of 2 Ha and 6 Pocket Parsk of 0.4 HA
Canning Town South: 6 Small Parks of 2 Ha and 13 Pocket Parks of 0.4 Ha
Royal Docks: 3 Small Parks of 2 Ha and 5 Pocket Parks of 0.4 Ha

Amount of new publicly accessible greenspace required to meet 0.71 HA provision in 2022 and 2038



Additional playground capacity should be provided by 2038 to meet the Six Acre Standard of 0.25 Ha/1,000 HoP:

Stratford New Town: 18.89 Ha
Canning Town North: 6.86 Ha
Canning Town South: 7.34 Ha
Royal Docks: 8.09 Ha
Beckton: 7.82 Ha

Additional allotment capacity should be provided to meet the National Allotment Society standard of 0.125 Ha per 1,000 HoP:

Stratford New Town: 10 Ha
Canning Town North: 3.67 Ha
Canning Town South: 3.88 Ha
Royal Docks: 4.25 Ha
Beckton: 4.62 Ha

8.0 Biodiversity baseline

8.1 Context

8.1.1 Sites of Importance to Nature Conservation (SINCs) are those areas of land which are recognised as being of particular importance for wildlife and biodiversity. Although a non-statutory designation, SINCs are afforded a high level of protection within the planning system.

8.1.2 Policy G6 Biodiversity and Access to Nature in the current London Plan requires London boroughs to:

- Use relevant criteria to identify SINCs and ecological corridors to identify coherent ecological networks.
- Identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

8.1.3 SINCs are described as part of a hierarchy depending on their relative importance:

- Sites of Metropolitan Importance – strategically important nature conservation sites for London.
- Sites of Borough Importance – sites which support habitats or species of value at the borough level.
- Sites of Local Importance – sites which provide access to nature at the neighbourhood level.

The distinction between Metropolitan, Borough and Local SINCs is based on long-standing guidance originally produced by the London Ecology Unit, updated in April 2019 to align with London Plan policy. The guidance is available at https://www.london.gov.uk/sites/default/files/sinc_selection_process_2019_update_.pdf

8.1.4 A review of Sites of Importance for Nature Conservation (SINC) is undertaken to provide information on these areas of land with intrinsic nature conservation value within the borough and their spatial distribution.

8.1.5 This information is essential for informing Local Plan policies and supplementary planning documents regarding biodiversity conservation and ecological enhancement, and also for shaping other relevant policies such as use of open space, access to nature, climate change adaptation and sustainability.

8.1.6 Furthermore, an understanding of the SINC network provides the foundation for the development and implementation of a Local Nature Recovery Plan, as the majority of the most valuable habitat for wildlife across the borough will be within SINCs.

8.1.7 A review of Newham's SINCs was undertaken between June-August 2022. This involved a desk-top review of existing information about Newhams SINCs (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINCs and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to:

- Review the current SINCs and identify potential changes to boundaries or status and justify these changes as necessary.
- Identify and justify potential new SINCs to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINCs.

8.2 Current SINCs

8.2.1 Prior to the review there were forty-two SINCs within the current Newham planning boundary with written citations and mapped boundaries (two Metropolitan, twenty Borough, and sixteen Local). The two Metropolitan SINCs are large sites which also lie across a number of London boroughs. The full list of Newham SINCs prior to the review is provided in Table 8.1.

Table 8.1: Newham SINCs (prior to review)

London SINC Code	Grade	Site Name	Accessible
M031	M	River Thames and Tidal Tributaries	Partially
M109	M	Epping Forest South	Yes
NeBI04	BI	Bromley-by-Bow War Memorial Wood	Yes
NeBI05	BI	Thames Wharf	No
NeBI06	BI	Manor Park Cemetery	Yes
NeBI07	BI	Woodgrange Park Cemetery	Yes
NeBI08	BI	Beckton District Park and Newham City Farm	Yes
NeBI09	BI	City of London Cemetery and Alders Brook	Yes
NeBI10	BI	Royal Docks	Yes
NeBI11	BI	East Ham Nature Reserve	Yes
NeBI13	BI	Cuckold's Haven Nature Reserve	Yes
NeBI15	BI	Beckton Sewage Treatment Works northern settling lagoon	No
NeBI16	BI	The Greenway and Old Ford Nature Reserve	Yes
NeBI17	BI	Bow Creek Ecology Park	Yes
NeBI18A	BI	Beckton Meadows South	No
NeBI18B	BI	Land between Langdon School and the A406	Partially
NeBII03	BII	East London Cemetery	Yes
NeBII05	BII	Thames Barrier Park	Yes
NeBII08	BII	Beckton Alps	No
NeBII10	BII	Lady Trower Trust Playing Fields	No
NeBII11	BII	Railside Land in Newham	No
NeBII12	BII	Transco Rough	No
NeL02	L	All Saints Churchyard, West Ham	Yes
NeL03	L	West Ham Cemetery and West Ham Jewish Cemetery	Yes
NeL04	L	Forest Lane Park	Yes
NeL05	L	West Ham Park	Yes
NeL07	L	Priory Park	Yes
NeL08	L	Plashet Park	Yes
NeL09	L	Central Park	Yes
NeL10	L	The Old Orchard Site / The Old Orchard Langdon School	No
NeL11	L	Websters Land	Yes
NeL12	L	Newham Way Footpath	Yes
NeL13	L	Fun Forest	Yes
NeL14	L	Pylon Walk	Yes
NeL16	L	Lyle Park	Yes
NeL17	L	Star Park	Yes
NeL18	L	St Mary's Churchyard, Little Ilford	Yes
NeL19	L	Royal Victoria Gardens	Yes

SINC Grade key: M = Site of Metropolitan Importance BI = Site of Borough Importance (Grade I) BII = Site of Borough Importance (Grade II) L = Site of Local Importance.

8.2.2 In addition to the SINCs listed in Table 8.1 there are also several other SINCs shown on the Newham Local Plan Policies Map which are not numbered as part of the Newham series and do not have written citations. These are proposed SINCs identified in the document Evidence Base: Biodiversity and Green Space v2. London Borough of Newham. July 2015 prepared for the Local Plan review. The list of additional SINCs shown on the Local Plan policies map is provided Table 8.2. These were also considered as part of this review.

Table 8.2: ***Additional SINCs shown on Local Plan Policies Map***

Local Plan Identifier	Site Name	Accessible
SINC 10	DLR Corridor Canning Town	No
SINC 11	Miers Close	No
SINC 12	Ham Creek Wood	No
SINC 13	DLR Corridor Royal Victoria	No

8.2.3 For planning purposes, part of the London Borough of Newham is currently covered by the Local Plan of the London Legacy Development Corporation (LLDC). London Borough of Newham will regain planning powers for this area in 2024 and therefore the SINCs within the LLDC area are also subject to this review. The list of current SINCs within the LLDC Local Plan are provided in Table 8.3.

Table 8.3: ***SINCs in the LLDC planning area***

London SINC code	Site Name	Accessible
M071	Lee Valley	Yes
NeBI03	Bow Back Rivers	Yes
NeBI16	The Greenway and Old Ford Nature Reserve	Yes
Not known	Mill Meads	Partially

8.3 Other sites reviewed

8.3.1 In addition to reviewing all the current SINCs identified in Tables 8.1, 8.2 and 8.3 a number of other sites were also considered as potential new SINCs. These were identified through review of aerial imagery and through various sources of information cataloguing the ecology and wildlife of the borough. These sites, with a rationale for their inclusion in the review, are listed in Table 8.4.

Table 8.4: ***Non-SINC sites reviewed***

Non-SINC sites reviewed	Location	Rationale
Cody Dock	Adjacent to River Lea	Currently being restored to create community facility
Ditches around A13 and A406 roundabout	South of Newham Central Depot	Connectivity between habitats along River Roding and sites in green spaces west of A406
Galleons Point Riverside	Adjacent to Thames either side of Royal Docks dock gates	Riverside habitat not part of the River Thames and Tidal Tributaries SMI
Limmo Peninsula and riverside south of Canning Town	South of Canning Town station	Landscaping along riverside walk along Lower Lea that is not part of the River Thames and Tidal Tributaries SMI
Barrington Playing Fields	Roding corridor north of London Overground railway line	Substantial area of rough grassland
Leigh Road Sports Ground	Roding corridor south of London Overground railway line	Substantial area of rough grassland, scrub and mature boundary trees
Mushroom Farm	Between Barrington Playing Fields and A406	Area of scrub and secondary woodland
Beckton Riverside	Former Beckton Gasworks and surrounding land	Large are of brownfield land and Thames river frontage
Canning Town Recreation Ground	South of Newham Way, west of Prince Regent Lane	Northern part of park has mature trees plus newly established wildflower grassland
Land at Royal Road	South of Royal Road	Area of rough grassland and scrub north of existing allotments
Portlands Lake East	West of Victory Park, Stratford	Naturally landscaped area and part of sustainable drainage system for East Village

8.4 Outcome of review

8.4.1 The paragraphs below provide an overview of the review, including any recommended changes to the status of boundaries of SINCs and recommendations for new SINCs.

Changes to status of current SINCs

8.4.2 Both of the current Metropolitan SINCs in Newham are considered still to be of London-wide importance.

8.4.3 None of the current Borough SINCs are considered to have an increased ecological value that would warrant Metropolitan SINC status.

8.4.4 Two of the current Local SINCs are considered suitable for being upgraded to Borough status:

- West Ham Park (currently SINC NeL05) is a traditional park which is managed in a rather formal way. However, it has a large concentration of mature trees and shrubs and dense perennial planting, especially in the ornamental gardens. This makes it a good habitat for a range of breeding and migrant birds, and the mature trees are likely to support bat roosts and habitat for invertebrates that are reliant of mature trees. Parts of the park could be easily enhanced for wildlife by relatively minor management changes such as the creation of patches of wildflower meadow.

- The planting and landscaping at Webster's Land (currently SINC NeL11) has matured since it was first identified as a Local SINC. It now has a large central area of meadow, and dense planting of trees and scrub, especially along the eastern boundary where it abuts the A406. Consequently, it has habitats that attract grassland invertebrates and a range of breeding and migrant birds. Although the site requires better management in the long-term its ecological value is higher than its current Local status would suggest.

8.4.5 One of the current Local SINCs is no longer considered to be of Local status:

- Star Park is a fairly typical local park comprised of paths, play areas, planted trees and large areas of amenity grass. Although some of the trees are semi-mature there are no mature trees or areas of wildflower grassland that are present in other local parks with Local SINC status. The park could regain its status by creation of areas of wildflower meadow, for example, in a discrete part of the park, such as the land to the west of the junction of Avondale Road and Percy Road.

Changes to the boundaries of current SINCs

8.4.6 Just eight current SINCs have more significant boundary changes:

- Part of the SINC south of Langdon School is proposed to be reallocated to a proposed new SINC to ensure a more logical separation between distinct habitat types.

- The SINC at Beckton Meadows South is proposed to be amended to account for an expansion of part of Beckton Sewage Treatment Works. Although part of the original SINC has been lost, the new SINC is larger in extent due to habitat creation and landscaping works associated with the upgrade to the sewage works.

- The borough SINC at Lady Trower Trust Field is proposed to be extended to include land at Miers Close, which lies to the south and is contiguous with the southern boundary of the existing SINC. The land at Miers Close is currently identified as a separate SINC on the current Local Plan policies map.

- The boundary of the SINC along the Greenway is proposed to be extended to include an area of trees, scrub and reedbed at Clap Gates Lane.

- The boundary of the SINC at Bromley-by-Bow Gasworks is proposed to be extended to the whole site as the habitats present within the current boundary occur across most of the site. N.B. This site is already identified as a strategic development site in the existing Local Plan.

- The SINC at Forest Lane Park is proposed to be extended to include the green space to the north. In addition, a small part of the green space within the existing SINC boundary is recommended for deletion.

- The boundary of the SINC at Pylon Walk is proposed to be extended to include the scrub and woodland at Ham Creek Wood, and an additional area of scrub to the west, as they provide a continuous area of woodland canopy.

- The boundary of the SINC at Newham Way Footpath is proposed to be extended to include the scrub on the embankment to the north of the existing site boundary.

Changes to the 'Additional' SINCs shown on the Local Plan policies map

8.4.7 Of the four 'additional' SINCs shown on the Local Plan policies map two are proposed to be merged with an existing SINCs (as detailed above) and two are proposed for deletion.

8.4.8 The two SINCs proposed for deletion (SINC 10 and SINC13) are both strips of land associated with the DLR rail corridor. They are both inaccessible and are subject to standard rail corridor management which involves occasional cutting back of Buddleia scrub. Their intrinsic nature conservation value is relatively minor and there is limited scope for ecological enhancement.

Changes to the status of SINCs in LLDC planning area

8.4.9 The Metropolitan SINC in the LLDC area is considered still to be of London-wide importance.

8.4.10 None of the other SINCs in the LLDC area are considered to have an increased ecological value that would warrant Metropolitan SINC status.

Changes to boundaries of SINCs in the LLDC planning area

8.4.11 A part of the Lee Valley Metropolitan SINC is considered to be a distinct area of habitat that merits its own SINC status. The site, the Lee Valley Velopark Rough is described in the New SINCs section below.

8.4.12 The boundary of the Mill Meads SINC should be extended to include land within Abbey Mills Pumping Station.

8.4.13 The boundary of The Greenway should be amended to remove Abbey Lane Open Space and include some of the land at Abbey Lane Gas Depot.

New SINCs

8.4.14 Part of an existing Metropolitan site and seven of the sites identified in Table 8.4 are proposed as new SINCs:

- Lee Valley Velopark Rough is land that forms the mountain bike circuit within the Lee Valley Velopark. It is an of free-draining undulating terrain with patches of scrub, ruderal habitat, open ground, disturbed ground, boulders and log-piles which provides good habitat for a range of uncommon invertebrates, reptiles and birds such as linnet. It is a very distinct and different from the habitats in the rest of the Queen Elizabeth Olympic Park.

- Leigh Road Sports Ground is an extensive area of rough grassland, with scattered trees and scrub around the boundary, surrounding the former East Ham gas works. It has some direct connectivity with the River Roding corridor as the A406 is elevated here. It provides good habitat for grassland invertebrates such as butterflies and grasshoppers and is likely to support reptiles such as slow worm and, possibly, grass snake. Birds such as kestrel, green woodpecker and meadow pipit which require large areas of grassland habitat also occur here. It is designated as Metropolitan Open Land and green space on the current Local Plan policies map.

- Barrington Playing Fields lies just to the north of Leigh Road Sports Ground and is similar rough grassland habitat bordered by semi-mature trees and areas of scrub. This site has been subject to tree-planting in the past albeit much of it appears to have failed. The 'Mushroom Farm' is an area of land lying between Barrington Playing Fields and the A406. The land beneath the A406 is a light industrial estate, but separating this area and Barrington Fields is

an inaccessible embankment covered in scrub with some areas of bramble and open grassland. It is likely to provide breeding habitat for birds and the scrub edge is valuable invertebrate habitat. Both of these sites are designated as Metropolitan Open Land and green space on the Local Plan policies map.

- The ditches in and around the intersection of A13 and A406 are remnants of the former marshes adjacent to the tidal part of the River Roding. Although there is no longer any tidal influence in these ditches, they still provide a network of largely undisturbed linear wetland habitat. They are identified as safeguarded flood defence infrastructure on the Local Plan policies map.

- Beckton Riverside is a site which was once occupied by Beckton gas works. It is now an extensive area of brownfield land bordering the River Thames comprising areas of rough grassland, ruderal habitat, open ground, scrub and a relatively large reed-fringed attenuation pond. The site supports some uncommon species of plant and breeding birds which are uncommon in London. It is likely to be an important site for invertebrates. It is designated as a Strategic Site in the Local Plan with an aspiration for major development including open space and green infrastructure. This site is part of a larger area of land identified as a Strategic Site in the existing Local Plan which aims to deliver a major new town centre and residential neighbourhoods with associated green infrastructure and public open space.

- The Thames Gateway Bridge Safeguarded Land is a corridor of land stretching from the Thames at Beckton to the Greenway. The land has become vegetated and includes areas of open mosaic habitat (contiguous with the Beckton Riverside site described above), scrub, small areas of ephemeral wetland and secondary woodland. It provides a valuable ecological connection between the Thames, the Greenway and the Roding valley to the north. The secondary woodland is a result of tree-planting along the Royal Docks Road. The majority of the SINC is land safeguarded for a potential Thames river crossing.

- Canning Town Recreation Ground is an existing district park with mature trees which has recently been ecologically enhanced by the creation of a relatively large area of wildflower meadow in the north-eastern part of the park.

- Portlands Lake East is a landscaped corridor in the Olympic Park East Village which connects Victory Park with the main part of the Olympic Park. It is part of the sustainable drainage system and provides an area of woodland and wetland habitat within an area of formal public realm. As such is provides a good example of access to nature in the built environment.

8.4.15 Four of the sites identified in Table 8.4 were discounted as potential new SINCs:

- Parts of the Limmo Peninsula and riverside south of Canning Town include areas of vegetated land associated with the DLR rail corridor and areas that have been landscaped as part of a riverside walk along the Lower Lea. However, the majority of site comprises hardstanding and former compounds as a consequence of the site having been a construction area for Crossrail. The potential SINC status of the site should be subject to future review following redevelopment of the site for housing with associated riverside landscaping and green space.

- Cody Dock lies adjacent to the tidal part of the River Lea. It comprises open water, a small reedbed, scattered trees and scrub, and planted areas with a mix of native and exotic species which are beneficial for wildlife. Although these habitats, plus its function as a community space, would merit Local SINC status, the dock is currently being restored to provide new workspace; a dry dock; moorings; a café; and community space. This will limit its intrinsic nature conservation value. However, the regeneration works will also establish a new connection to the River Lea Park walkway and the new facilities at Cody Dock will provide a hub for ecological improvements to River Lea Park and surrounding areas.

- Gallions Point Riverside includes various linear green spaces lying between the statutory flood defence wall on land around the mouth of the Royal Docks and the former river wall along the Thames which no longer provides a flood defence function. They include areas of scrub, open grassland and ecological landscaping that provides some informal access to parts of the riverside. However, some of these areas are already within the River Thames and Tidal Tributaries SINC. Those parts that are not are a mix of formal landscaping and more ecologically sympathetic landscaping, but they don't form a coherent site.

- The land at Royal Road was discounted as being identified as a new SINC. Although it contains habitat (rough grassland and scrub) which could qualify for Local SINC status. it has already been allocated in the current Local Plan as land for a potential special educational needs school and as potential green space. Furthermore, it is located in an area with existing Local and Borough SINC provision.

8.5 Summary of SINC review

8.5.1 The review of Newham SINCs has identified that:

- The majority of the existing SINCs continue to meet the criteria for recognition as Metropolitan, Borough or Local SINCs.

- Two existing Local SINCs should be upgraded to Borough status.

- One existing Local SINC should be deleted.

- Eight SINCs require boundary changes to include additional areas of habitat.

- Eight sites are proposed as new SINCs.

9.0 Developing standards for access to nature ; identify deficiencies

9.1 Context

9.1.1 The London Plan recognises the importance of access to nature both for its own intrinsic value and because of its benefits to people's health and well-being. Consequently, the land-use planning process should secure access to areas of natural habitat where appropriate so that Londoners can better experience and appreciate the natural environment within the city.

9.1.2 To ensure that access to nature is measured and monitored 'Areas of Deficiency in Access to Nature' (AoD) have been determined by mapping built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or Borough Site of Importance for Nature Conservation (SINC) i.e. those areas formally identified in Local Plans for the important habitats they support.

9.1.3 Prior to 2007 AoD was calculated by desk-top measurements and field surveys. Technological advances have automated this process and rather than the measurement of AoD being reliant on an estimation of 1km walking distances for neighbourhoods, predictive and custom modelling using geographic information system software can model AoD to show how changes to accessible Metropolitan or Borough SINC boundaries, or new access points into relevant SINCs, will impact AoD.

9.2 Areas of Deficiency in Access to Nature in Newham

9.2.1 For the purposes of the Local Plan review the existing standards recommended by the Greater London Authority, and mapped by Greenspace Information for Greater London, will be used to determine changes to the existing AoD in the borough.

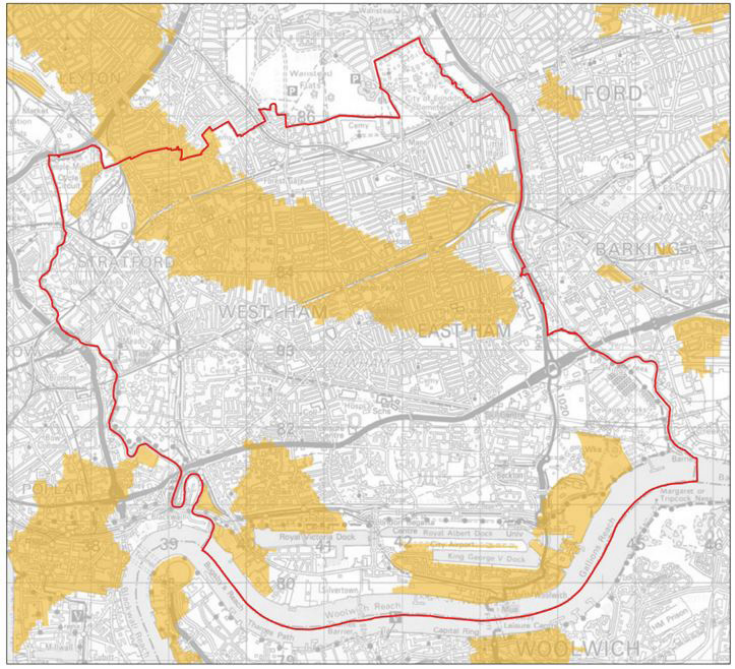
9.2.2 Many residents in the borough already benefit from access to nature due to the presence of sites and features such as the frontage of the River Thames, the Queen Elizabeth Olympic Park, accessible parts of

the River Lea at Bow Creek, the southern part of Epping Forest and The Greenway.

9.2.3 Nevertheless, some parts of the borough area borough currently deficient in access to nature. These are primarily:

- suburban parts of the borough between Stratford and East Ham where existing SINCs are only of Local value;
- parts of the eastern parts of the borough which are adjacent to areas of Borough value SINCs and Metropolitan Open Land that are currently private and inaccessible;
- the industrial, or former industrial, parts of the borough such as Beckton Sewage Works and Beckton Riverside, and the Thames river frontage between the Limmo Peninsula and Lyle Park.

9.2.4 Newham's AoD are illustrated below.



9.3 Reducing Areas of Deficiency in Newham

9.3.1 Reducing the extent of those parts of the borough that are in AoD is primarily reliant on increasing the provision of accessible Metropolitan or Borough SINCs in or within 1km of neighbourhoods within AoD.

9.3.2 The review of Newham's SINCs, which has provided an evidence base for the Local Plan, has identified opportunities for provision of new Borough SINCs in key locations. This includes the upgrade of West Ham Park from Local to Borough SINC, the potential creation of a Borough SINC at Beckton Riverside (subject to the masterplanning of this major strategic site), and potential new Borough SINCs along the Roding Corridor. However, most of the proposed sites along the Roding Corridor are currently private an inaccessible, except for the land at Barrington Fields which is owned by Newham Council but is currently inaccessible.

9.3.3 In addition to securing physical access to some of these site, the potential for these sites to reduce the borough's AoD is dependent on the outcome of the SINC review consultation, as the contribution to reducing AoD is reliant on their designation as Borough SINCs on adoption of the new Local Plan.

9.3.4 Despite the potential for the designation or establishment of new Borough SINCs to reduce AoD it is likely that parts of the borough will continue to be within AoD as currently defined by London Plan policy and SINC criteria. In these locations, policy needs to favour development and programmes that contribute to the greening of the public realm. This will not result in a formal reduction in the extent of AoD but these measures can provide more people with some experience of the natural world at the neighbourhood level, as well as some of the other benefits associated with urban greening such as air quality improvement and creating increased resilience to the impacts of climate change.

10.0 Opportunities for SANG to reduce pressure on Epping Forest

10.1 Context

10.1.1 Epping Forest lies to the north-west of the London Borough of Newham, It is designated under the Conservation of Habitats and Species Regulations 2017 (as amended) as a Special Area of Conservation (SAC).

10.1.2 Research undertaken in 2018 indicated that the special features of the SAC were in decline. This is due, in part, to recreational pressure from visitors who regularly travel up to 6.2 kilometres to visit the site.

10.1.3 The Government's nature conservation agency, Natural England, produced advice that all residential development within 3km of the SAC and all development with 100 or more dwellings within 6.2km of the SAC should make a financial contribution to strategic measures to manage these recreational pressure. These strategic measures, including increased management of sensitive parts of Epping Forest and the creation of suitable alternative natural green space (SANG), aim to encourage visitors to use designated areas away from sensitive parts of the Forest and to provide attractive alternative open spaces to reduce the visitor pressure on the habitats of the Epping Forest SAC.

10.1.4 Parts of the borough fall within the 6.2km 'zone of influence' and residential development in the borough is likely to result in an increase in recreational pressure on the Epping Forest SAC. Consequently, through the planning process the borough is required to assess likely significant effects of new development within the 6.2km zone of influence and secure suitable mitigation to ensure no adverse effects of new development. Suitable mitigation can be in the form of financial contributions to management of the SAC and/or contributions (physical or financial) to the establishment of SANG.

10.2 Criteria for SANG

10.2.1 There are no hard and fast criteria for SANG across the country, but Natural England has produced 'Guidelines for Creation of Suitable Alternative Natural Greenspace' drawing on experience and lessons learnt for the first SANG which were developed to protect the Thames Basin Heaths SAC.

10.2.2 SANG can be created from:

- existing open space with no existing public access or limited public access, which could be ecologically improved and made fully accessible to the public; or
- existing open space, which is already accessible, but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit a sensitive site.

10.2.3 SANG cannot be created on other sites of high nature conservation value which are likely to be damaged by increased visitor numbers.

10.2.4 The main requirements of SANG is that they should:

- be at least 4ha in size;
- provide for a circular walk of 2 - 5km;
- be perceived as semi-natural spaces with little intrusion of artificial structures;
- aim to provide a variety of habitats for users to experience;
- provide largely unrestricted access.

N.B. Sites of between 2 - 4ha are permissible if they are connected and can meet the other criteria above.

10.2.5 Desirable features of SANG, particularly with respect to reducing recreational pressure on the Epping Forest SAC, include:

- Cycle routes, especially for off-road cycling;
- Space to exercise dogs off leads.

10.3 SANGs opportunities in Newham

10.3.1 Parts of Newham already has a deficit of public open space which is likely to be exacerbated due to the planned growth in key wards. Consequently, the potential for many of the boroughs existing accessible open spaces to be improved to provide SANG is limited as they are already well used. Furthermore, they are already fulfilling a number of key functions, including outdoor sports provision which constrains the potential for enhancement of their landscape and ecological value which is an essential requirement of SANG.

10.3.2 Nevertheless, there are some strategic sites across the borough which have the potential to be enhanced so as to provide an experience that would meet the core SANG criteria. These include:

- Beckton District Park;
- a number of sites along the Roding Corridor
- Beckton Riverside – if part of a network of sites connecting to the Greenway and the River Thames
- The Lower Lea

10.3.3 Local Plan policies, and other council programmes, need to unlock the potential of these sites, especially those along the Roding Corridor and at Beckton Riverside which are currently inaccessible. The Green Infrastructure Strategy will provide further details about these opportunities.

11.0 Biodiversity Net Gain commentary

11.1 Context

11.1.1 Biodiversity in Newham, in common with elsewhere in London, is generally in decline. This is a result of direct effects such as increased development, loss of vegetated gardens and recreational pressure on green space, as well as indirect effects such as climate change which is disrupting life-cycles and seasonal patterns of migration.

11.1.2 London Plan policy requires the protection of Sites of Importance for Nature Conservation (SINCs) and the protection and conservation of priority species and habitats that sit outside the SINC network. This provides the core policy framework for conserving biodiversity. However, policy recognises that where harm to a SINC is unavoidable, and where the benefits of development clearly outweigh the impacts on biodiversity, proposals should:

- avoid damaging the significant ecological features of the site;
- minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site;
- deliver off-site compensation of better biodiversity value.

11.1.3 Government has recognised the challenges of meeting biodiversity objectives alongside national and regional policies promoting economic growth and meeting housing need. Consequently, the Environment Act 2021 introduced a requirement for new development to leave the natural environment in a measurably better state than it was beforehand by ensuring that all new development delivers a minimum 10% biodiversity net gain (BNG) either on the development site or, if this is not feasible, as an offset elsewhere. This requirement becomes mandatory in November 2023.

11.1.4 BNG is calculated using the approved Defra Biodiversity Metric. It uses a spreadsheet-based calculator to determine the total number of habitat units present on a site prior to development and the total number of habitat units retained, enhanced or created as a result of the development proposal. The BNG score results from subtracting the

habitat unit value of the existing habitats from the habitat unit value of the proposed habitats and presenting this as a percentage change.

11.1.5 A key tenet of the BNG approach is that the score provided by the calculator should not be the only factor determining whether a proposal has achieved a better outcome for biodiversity. The context of the proposal should also be considered, especially the other environmental benefits that can be achieved delivery of green infrastructure and/or nature-based solutions that can address the impacts of climate change or improve public health.

11.2 Application of BNG in London

11.2.1 Although it will be a mandatory requirement, BNGwill be delivered through the land use planning process with planning consent not given without the mandatory requirement being met.

11.2.2 Although 10% is the minimum mandatory requirement, local authorities have the scope to require a higher BNG through planning policy.

11.2.3 As yet no London borough has opted to propose policy requiring a BNG score higher than the forthcoming mandatory requirement.

11.3 Is there a justification for a higher BNG in Newham?

Why has national legislation set a 10% BNG requirement?

11.3.1 The 10% increase was selected on the basis that this would, in most circumstances, result in an appreciable and quantifiable net gain (i.e. codifying the '***measurable biodiversity net gain***' required in the NPPF) and because the Department of Environment Food and Rural Affairs (Defra) evidence base and impact assessment [2], undertaken to test the impact of the policy, indicated that the a 10% requirement is unlikely to significantly affect the viability of new development

Would an uplift in the BNG requirement affect viability in Newham?

11.3.2 Several local planning authorities outside of London, in Cambridgeshire, Bedfordshire and Kent, have explored adopting a 20% BNG requirement. A study by Kent County Council[3] found that:

- A shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances.
- The biggest cost in most cases will be to achieve the mandatory 10% BNG. The increase to 15% or 20% BNG in most cases is generally marginal.
- Because the BNG costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.

11.3.3 Although authorities in Kent are not directly comparable to the context in Newham, it is likely that the same considerations would apply, and viability would not be affected by a higher BNG requirement. Furthermore, average housing densities are unlikely to be affected in Newham, as delivery of BNG in London relies more heavily on the provision of green roofs than would be the case in Kent, and green roofs do not significantly affect land take. Nevertheless, a policy proposing an uplift in BNG in Newham that would be above the mandatory requirement would still be subject to viability testing.

11.3.4 Some additional factors are especially relevant in London which might add weight to any challenge on the grounds of viability or deliverability. Green roofs often make an important contribution to the achievement of BNG on urban development sites. This is because there is scope to create habitat on a biodiverse green roof which is less easy to achieve at ground level due to the other demands (such as active travel, recreation and play) which may not be compatible with sensitive habits created in the public realm. However, existing London Plan policy on minimising greenhouse gas emissions requires developments to maximise opportunities for on-site electricity and heat production, and new London Plan Guidance on Fire Safety[4] requires at least one lift per core (or more) to be a suitably sized evacuation lift. These other policy requirements reduce the area available for biodiverse green roofs.

Would a higher BNG requirement increase biodiversity in Newham?

11.3.5 Existing planning policies in the London Plan and Newham Local Plan already provide a framework for ensuring that the most important habitats are protected through designation as Sites of Importance for Nature Conservation. These policies encourage the delivery of development on existing developed land, or previously developed land, rather than land of nature conservation value. Therefore, most of the sites allocated for development have a relatively low biodiversity baseline because they are predominantly sites with existing buildings and low-quality habitats such as amenity grassland and planted trees and shrubs. Consequently, the 10% BNG requirement will deliver relatively little in the way of increased biodiversity as it is a 10% increase of a low baseline value. Furthermore, on sites with a low baseline value increasing the BNG requirement (to 15% or 20%) would still result in only small gains.

11.3.6 There are some allocated sites in Newham, such as former gasworks sites, where the biodiversity baseline is high. On those sites the forthcoming 10% BNG itself will be difficult to achieve, therefore, an increase in the BNG requirement to more than 10% may risk making the projects unviable or encourage developers to meet their BNG requirement offsite.

11.3.7 Where biodiversity loss cannot be mitigated or compensated for on site the BNG metric quantifies the number of habitat units that need to be provided as enhanced compensation offsite with the developer funding habitat creation or enhancement elsewhere.

11.3.8 Two key issues require consideration with respect to maximising the amount of compensatory habitat creation provided by increasing the percentage BNG requirement. Firstly, as most sites will have a relatively low biodiversity baseline the amount of offsite habitat creation required is likely to be small and, therefore, the compensation may not be significant; therefore, increasing the BNG requirement to more than 10% would likely result in a very marginal increase in the required compensation. Secondly, although local authorities will be able to use their own land to provide habitat creation offsetting for developers this will be subject to the same rules and requirements for other providers who are entering the market and local authorities will not be able to direct developers to deliver habitat creation on local authority land in preference to other suppliers. Therefore, unless Newham Council or other potential providers in the borough have relatively large areas of land on which habitat creation or enhancement can be the priority land use, provided at a competitive price and sustained for at least 30 years, it is likely that those developers who are required to deliver a large amount of offsetting will look to providers outside of the borough. Consequently, an increase in the BNG requirement to more than 10% will not necessarily result in increased biodiversity in Newham.

Does the London Plan Urban Greening Factor negate the need to seek an increase in percentage BNG?

11.3.9 The Urban Greening Factor (UGF) was developed for London, in part, due to the likelihood that on many development sites the BNG requirement may deliver relatively little due to the low biodiversity baseline. The UGF was not designed to deliver biodiversity benefits per se but, as all developments have to implement a significant amount of urban greening to achieve the recommended target score, in most cases (i.e. on development sites with a low biodiversity baseline), a BNG of well over 10% is usually achieved as a beneficial secondary outcome because of the inclusion of features such as biodiverse green roofs and additional tree planting. This is evidenced by the fact that most planning submissions submitted in Newham since January 1st 2022 have demonstrated BNG scores which range from 19.78% to 217% [5].

11.4 Conclusions

11.4.1 In Newham, raising the BNG requirement from at least 10% to 15% or 20% is likely to have limited benefits. This is because the vast majority of development sites in Newham will have a low biodiversity baseline, and a percentage increase of 15% or 20% from a low baseline will result in marginal gains over and above the forthcoming mandatory 10% requirement. Furthermore, for sites with a low biodiversity baseline the application of the UGF is likely to result in a BNG of over 10% by default, thus further weakening the case for seeking an uplift in the percentage

BNG *per se*.

11.4.2 There are a handful of allocated sites in the borough which will be required to provide a significant package of biodiversity net gain when or if developed. These are sites which have been identified as Strategic Sites for development that have not hitherto been assessed for their existing nature conservation value. The SINC review[6] undertaken to inform the new Local Plan has identified these sites. Rather than increasing the BNG requirement, which would likely encourage developers to seek offsets outside of the borough due to limited opportunity for offsetting with Newham, these sites should be dealt with through the application of planning policies relating to SINCs and the provision of new open space and green infrastructure.

[2]Net gain impact assessment (publishing.service.gov.uk)

[3]Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf (kentnature.org.uk)

[4]Fire Safety LPG | LGOV (london.gov.uk)

[5]Data available on the London Borough of Newham Planning Portal Simple Search (newham.gov.uk)

[6]Review of Sites of Importance for Nature Conservation in Newham. London Wildlife Trust. (October 2022)

12.0 Recommendations for Urban Greening Factor

12.1 Context

12.1.1 Newham, in common with other London boroughs, is facing a number of significant social and environmental challenges during the period of the next Local Plan.

12.1.2 Rapid population growth, in particular, will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space, not least the balance between providing enough housing and associated infrastructure and protecting and improving Newham's green spaces and natural environment.

12.1.3 It is widely accepted that the key to achieving this will be finding better ways for neighbourhoods to be more space-efficient through good planning and design. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities. A fundamental part of this approach is to incorporate green elements into the built environment to provide a range of benefits including enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the borough where existing traditional green space is limited.

12.1.4 London Plan policy requires all major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design. This requires incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Mayor has set urban greening targets of 0.4 for predominantly residential developments and 0.3 for predominantly commercial developments (excluding B2 and B8 uses).

12.1.5 The provision of urban greening to meet the required scores is determined by calculating how much urban greening of different types (which are given a different multiplier depending on their function and

efficacy) is being delivered and dividing the total area of proposed greening by the area of the site.

12.2 Application of UGF in London

12.2.1 Despite setting target scores, the London Plan policy recognises that London boroughs may wish to set their own target scores based on the needs and challenges faced by different boroughs.

12.2.2 Experience to date suggests that the target scores in the London Plan are achievable but challenging. Consequently, no London borough has yet set their own target scores. They have adopted the target scores provided in the London Plan.

12.2.3 Furthermore, at the London Plan Examination in Public the Inspector found that *"The scoring system provides a firm basis for assessment and is a justifiable and innovative starting point for policy making in this area. Whilst experiences vary and the testing undertaken has not been extensive, there is no strong evidence that for residential and office development the interim targets are unachievable. Some argue that they should be higher than 0.4 and 0.3 respectively but they appear to strike the right balance at the moment. Potential costs have been factored in and the policy will bring about benefits to the value of developments by focussing attention on greening and ensuring that it is considered from the outset."*

12.3 Is there a justification for higher UGF scores in Newham?

Does Newham have a 'green' deficiency?

12.3.1 Newham faces challenges with respect to population growth and intensification of development whilst also having a relatively low provision of open space across parts of the borough. Open space covers 30% of Newham although a significant amount of this space is open water; just 13.1 % of the borough is accessible green space. This is similar to Tower Hamlets, but compares unfavourably with neighbouring boroughs such as Waltham Forest, Redbridge and Barking & Dagenham. Furthermore, the borough has just 16% tree cover which is the second lowest in London.

Would setting higher UGF target scores address some of the challenges?

12.3.2 The UGF is not a 'green space factor'. Its primary purpose is to integrate functional landscaping into new development to deliver a range of benefits for climate adaptation; air quality; public health; and biodiversity conservation. It is not a mechanism for securing additional open space within new developments on order to meet public open space standards. It can however contribute to the creation of additional amenity green space, such as community gardens and terraces, often on podiums and roofs. These are beneficial to residents but don't always add to publicly accessible green space.

12.3.3 The UGF can however make a significant contribution to tree cover as it encourages good quality tree planting in all new developments.

12.4 What is the mechanism for setting higher scores?

12.4.1 The Mayor of London has produced draft guidance to boroughs regarding the application of the UGF[7] .

12.4.2 The guidance indicates that new borough targets should be based on evidence relating to the need and opportunity for new green infrastructure, ensuring it is both locally relevant and achievable. Boroughs will need to gather local evidence of sufficient scope and detail relating to issues such as flood management or urban heat to support bespoke target setting. Furthermore, the draft guidance indicates that it is essential, in order to retain the integrity of the approach, to retain:

[7]ugf_-_consultation_version_sept_2021.pdf (london.gov.uk)

- the calculation methodology;
- the surface cover types set out in London Plan Table 8.2; and
- the surface cover factor scores set out in London Plan Table 8.2.

12.4.3 The draft guidance issued by the Mayor has not yet been finalised. The final version is due to be published by the end of 2022 or early in 2023. Early indications are that the final version of guidance will require boroughs to maintain the calculation methodologies already provided which will limit the scope for boroughs to prepare bespoke approaches. However, the final guidance may also provide boroughs with the scope to seek urban greening offsetting where developments are unable to achieve the recommended target scores. This would provide a policy mechanism for ensuring appropriate levels of urban greening are provided in those parts of the borough where this is needed most.

12.5 Conclusion

12.5.1 The draft guidance issues by the Mayor of London provides limited scope for Newham to amend the UGF methodology and alter the recommended target scores. However, the possibility of requiring urban greening offsetting provides an alternative solution to achieving appropriate levels of urban greening. This will be explored further following publication of the final version of the Urban Greening Guidance by the Mayor of London.