

## Appendix 13: Community Facilities Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/001	Community Facilities	CF1 Existing community facilities						<p>[Add to it] Newham Local Plan 2022 Commentary</p> <p>Introduction</p> <p>These comments on the Newham Local Plan 2022 are submitted from the perspective of a trustee of Britannia Education Trust (BET) who operate the two primary schools in Silvertown, someone with a wider interest in neighbourhood planning in that area of the Royal Docks and as an urban designer who as worked on local plans for city authorities.</p>	Comment noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/002	Community Facilities	CF1 Existing community facilities						<p>[Add to it] Commentary is limited to the area of social infrastructure/community facilities (including schools) at a neighbourhood level and with regard to how the Local Plan links to and informs the development obligations set out in planning conditions, now the routine (if not in reality the only) way to deliver significant new community infrastructure.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul>

<b>Comment Response</b>	<b>Comment</b>	<b>Implementation</b>	<b>Justification</b>	<b>Clause</b>	<b>Introduction</b>	<b>Site allocation</b>	<b>Policy</b>	<b>Chapter</b>	<b>Comment Reference</b>	<b>Representor</b>	<b>Representation Reference</b>
<p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>											

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/003	Community Facilities	CF1 Existing community facilities						<p>[Add to it] The very large scale development of the Silvertown neighbourhood area has prompted both BET and West Silvertown Foundation (WSF), who operate the two community centres in that area, to consider how they might best plan ahead to meet the community needs of this rapidly growing community through existing and proposed new facilities.</p> <p>We have been told that the planning application for Silvertown Quays (and other developments) has been informed by the current and draft new Local Plan and associated guidance. We assume that the draft 2022 Local Plan will be used in this role for ongoing and future planning applications. It is important to clarify this as if this is not the case our comments are not going to potentially influence that Silvertown Quays planning application which is our major concern as it will define much of the area going forward given the potential scale of development obligations to provide social infrastructure that is feasible on this GLA owned 50 acre site ?</p>	Comment noted. The adopted Local Plan will be used primarily to assess the Silvertown Quays planning application. The emerging Local Plan will gain more weight as it progresses towards adoption and will be increasingly used to inform future planning applications. Comments are also welcome on individual planning applications.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/004	Community Facilities	CF1 Existing community facilities						[Add to it] It appears that the Local Plan plays a key role in setting the framework for negotiating development rights in the borough. As such, how it places requirements on developers and the planning team assessing site applications alike to effectively address and resolve defined social infrastructure needs is of critical importance, especially as there are no realistic other opportunities to realise such infrastructure investments given ongoing restrictions on central government spending and local authority's ability to raise funding of its own.	Comment noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/038	Community Facilities	CF1 Existing community facilities					CFI: Existing Community Facilities  Applicants wishing to bring forward a development which will impact an existing community facility should first consult Newham's Community Facilities Needs Assessment (2022) to understand existing provision in the borough and if the proposal site falls in an area of deficit.  Comment  There seems to be no acknowledgement that development can affect existing adjacent community facilities by way of increased demand. Phase 1 of Silvertown Quays has no social infrastructure provision and so will directly impact on the adjacent Britannia Village Hall community centre.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1, SI2 and SI3 all require the applicant to undertake a Social Value and Health Impact Assessment (see Policy BFN3). In addition, the Site Allocation's and Neighbourhood clauses in the Local Plan have been updated to reflect the Community Facilities Needs Assessment (2022). Where relevant, they now require applicants to provide community facilities to meet the needs of the local community.	

Reg18-T-009	Britannia Education Trust	Reg18-T-009/039	Community Facilities	CF1 Existing community facilities						<p>The CFNA provides mainly a survey of existing community facilities by location and number but remains silent on their suitability, capacity and condition as a provision beyond comparing numbers of various facilities as a ratio per 1000 population and 15 minute walking distance/accessibility.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Reg18-T-009	Britannia Education Trust	Reg18-T-009/040	Community Facilities	CF1 Existing community facilities							<p>Deficit areas appear to be only defined by distance of travel required and not capacity or quality of provision. This lack of metrics on actual provision versus demand means the CFNA does not appear to be a useful tool to guide investment in social infrastructure or inform strategic site allocation in the manner that education facilities are meant to follow.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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Reg18-T-009	Britannia Education Trust	Reg18-T-009/041	Community Facilities	CF1 Existing community facilities						<p>The CFNA seems mainly to be about protecting existing community facilities from being redeveloped for other uses.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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Reg18-T-009	Britannia Education Trust	Reg18-T-009/042	Community Facilities	CF1 Existing community facilities						The appears to be no attempt to define what an integrated neighbourhood social infrastructure might look like, how to arrive that this condition or the centrality of gains from development planning obligations (CIL and Section 106) in enabling the delivery of such a condition.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). Please see the new wording in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements for social infrastructure.
Reg18-T-006	Community Group Representative	Reg18-T-006/004	Community Facilities	CF1 Existing community facilities						[Add to it] It is good that protecting current facilities is included -	Support noted.
Reg18-T-006	Community Group Representative	Reg18-T-006/005	Community Facilities	CF1 Existing community facilities						[Add to it] however in North Woolwich there needs to be better options either for parking or improved public transport to reach facilities	Comment noted. Sustainable transport and parking is addressed in the policies in the Transport chapter of the Local Plan. In addition, this is why the policies in the Social Infrastructure chapter seek to direct facilities to well-connected locations.
Reg18-T-041	Community Group Representative	Reg18-T-041/001	Community Facilities	CF1 Existing community facilities						[Add to it] We need to upgrade rest and play areas. Make them normalised and available everywhere.	Comment noted. Please see GWS5 which addresses the need to provide new and improve play space in Newham.
Reg18-E-082	Resident	Reg18-E-082/039	Community Facilities	CF1 Existing community facilities			b.ii			8. Community facilities  • Page.123 (Existing Community Facilities - b.ii). Marketing for community use for at least 12 months, <b>rationale for this must be given</b> . Ideally it should be for 24 months, 12 months is a very short period to advertise and get responses.	A change to this policy approach has not been made. We did not consider this change to be necessary. The policy requires a minimum of 12 months marketing which is deemed to be a proportionate requirement. This, of course, does not preclude marketing taking place beyond this time frame.

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Reg18-K-037	Resident	Reg18-K-037/004	Community Facilities	CF1 Existing community facilities			1. Existing facilities will be protected and should not			There is a severe shortage of facilities and groups for older people in Newham. Access to services and affordable community gathering places is urgently required as personnel over 60 years of age are being ignored and forgotten, they are living in isolation, have no access to services and groups to socialise and commune. Urgent support for OAP services is required to prevent loneliness and isolation.	This policy approach has now changed to provide better guidance on what we consider an affordable space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.
Reg18-T-108	Resident	Reg18-T-108/001	Community Facilities	CF1 Existing community facilities						[Add to it] We need more facilities	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-T-123	Resident	Reg18-T-123/001	Community Facilities	CF1 Existing community facilities						[Add to it] toilets in public places, especially parks, existing toilets in Little Ilford park are closed for the last fifteen years.	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy SI2 already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation

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											text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2.
Reg18-T-126	Resident	Reg18-T-126/004	Community Facilities	CF1 Existing community facilities						[Keep it]	Support noted.
Reg18-T-002	Resident	Reg18-T-002/062	Community Facilities	CF1 Existing community facilities						[Change it] Be bolder	Comment noted.
Reg18-T-018	Resident	Reg18-T-018/009	Community Facilities	CF1 Existing community facilities						[Add to it] Helping	Comment noted.
Reg18-T-019	Resident	Reg18-T-019/004	Community Facilities	CF1 Existing community facilities						[Add to it] It's not clear as it feels a lot of information is not clear to me to contribute and educate us.	The Local Plan has been drafted to be clear and concise and uses plain English as far as possible so that it can be used and understood by a range of users. However, it is also a statutory planning document which means the document and policies are required to use planning language.
Reg18-T-038	Resident	Reg18-T-038/001	Community Facilities	CF1 Existing community facilities						[Add to it] Every "community" facility I come across are actually religious places of worship, who only care about what affects their ability to go on praying and very little about how to build a truly inclusive, tolerant, future for their children, the very reason they are all here! Does the council not have any real community objectives where real multiculturalism can be nurtured?	Comment noted. A range of community facilities play an important role in all our lives. The Local Plan was informed by the Social Integration Strategy and seeks to ensure a range of community facilities are protected and delivered in suitable locations across the borough.

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Reg18-T-038	Resident	Reg18-T-038/002	Community Facilities	CF1 Existing community facilities						[Add to it] What happened to youth clubs, and places where elderly or lonely, or anyone wishing to meet new people who are not all about praying or drinking to their death?	Comment noted. The policies in the Social Infrastructure Local Plan chapter are designed to protect and support new social infrastructure, of the type needed and in the most suitable location for Newham's communities.
Reg18-T-043	Resident	Reg18-T-043/004	Community Facilities	CF1 Existing community facilities						[Add to it]	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-057	Resident	Reg18-T-057/019	Community Facilities	CF1 Existing community facilities						[Add to it] X	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-058	Resident	Reg18-T-058/021	Community Facilities	CF1 Existing community facilities						[Add to it] More community centres at affordable prices	This policy approach has now change to provide better guidance on what we consider an affordable space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.
Reg18-T-072	Resident	Reg18-T-072/014	Community Facilities	CF1 Existing community facilities						[Add to it] Please ensure all community facilities are open to people of all ages. Many older people over 50s are being excluded from various hubs and centres, co-working spaces etc. Even Over 60s need safe places to meet up with friends and take part in cultural and work-related activities and learn new skills.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of facilities which older people may use.

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Reg18-T-088	Resident	Reg18-T-088/001	Community Facilities	CF1 Existing community facilities						[Change it] There is cycle shed facility in many local community park.	This policy approach has now change to provide better guidance in the implementation text to Policy SI1.7 on the need to provide cycle parking and storage. It now directs the reader to Local Plan Policy T3. Policy T3 sets out the requirements for how community facilities should be accessible and support access by sustainable modes of transport. This includes guidance on provision of cycle parking and storage.
Reg18-T-105	Resident	Reg18-T-105/008	Community Facilities	CF1 Existing community facilities						[Keep it]	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/016	Community Facilities	CF1 Existing community facilities			1.a			Sport England welcome the protection stance	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/017	Community Facilities	CF1 Existing community facilities			1.a			but it would like to highlight that under 1 a. future users should also be considered and not just current users or potential users when a facility is not in use.	This policy approach has now changed to clarify the intent of the policy which was to consider future as well as existing users of community facilities. Please see the new wording in Policy SI1 and the supporting Implementation point.
Reg18-E-118	Sport England	Reg18-E-118/018	Community Facilities	CF1 Existing community facilities			1.a.iii			In addition, in relation to 1. a, could it be clarified what is meant by 'available'? Sport England would only consider it acceptable (and align with National Policy) if the alternative facility has the same facilities as the site to be lost and has the spare capacity to accommodate the displaced current and future demand. It is recommended that this is clarified in this Policy.	This policy approach has now changed to clarify the intent of the policy and to better align with the NPPF. Please see the new wording in the supporting Implementation text for Policy SI1.

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Reg18-E-118	Sport England	Reg18-E-118/019	Community Facilities	CF1 Existing community facilities			1.b.i			In relation to CF1 1. b. i, Sport England again welcomes the stance however for a site to be surplus Sport England considers that this should be surplus to current and future needs/use not just existing use, especially given the growth projected in the borough and the limited land available to construct new facilities at a later date.	This policy approach has now changed to clarify the intent of the policy and to better align with the NPPF. Please see the new wording for Policy SI1.
Reg18-E-118	Sport England	Reg18-E-118/020	Community Facilities	CF1 Existing community facilities			1.b.iii			Sport England, however, considers that CF1 1 b. iii is contrary to both the NPPF, Paragraph 99, and Sport England Policy where it relates to sport facilities. Sport facilities, therefore, should be excluded from this exception for 1. b. iii. to be sound.	This policy approach has now changed to exclude sporting facilities from this exemption.
Reg18-E-118	Sport England	Reg18-E-118/021	Community Facilities	CF1 Existing community facilities						Sport England contends that developers should be required to consider the impact on existing facilities and mitigate any harm before bringing forward a development therefore it supports CF1.1.	Support noted.
Reg18-T-054	Theatre Trust	Reg18-T-054/001	Community Facilities	CF1 Existing community facilities						[Keep it] We welcome Policies CF1 [and CF3] which provide strong protection for Newham's valued facilities including its cultural venues. This includes a criteria within implementation guidance seeking asking prices/rents to reflect rates paid by community groups.	Support noted.
Reg18-T-054	Theatre Trust	Reg18-T-054/002	Community Facilities	CF1 Existing community facilities						[Keep it] We welcome Policies [CF1] and CF3 which provide strong protection for Newham's valued facilities including its cultural venues. This includes a criteria within implementation guidance seeking asking prices/rents to reflect rates paid by community groups.	Support noted.



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Reg18-T-054	Theatre Trust	Reg18-T-054/003	Community Facilities	CF1 Existing community facilities						[Keep it] The policy may be further enhanced through seeking demonstration that a facility couldn't be made successful under alternative methods of ownership for example community/voluntary operation.	A change this policy approach has been made. It should be noted that Policy SI3 already requires applicants to demonstrate and evidence that the facility has been actively marketed for culture and leisure use for at least 12 months and it can be clearly shown there is no alternative culture and leisure use that could take on the space to meet the needs of the local neighbourhood. However, we have added the need to consider of alternative methods of ownership to the Implementation text for Policy SI1- which is used in reference to Policy SI3.
Reg18-E-050	Anchor	Reg18-E-050/020	Community Facilities	CF2 New and re-provided community facilities						Anchor does not agree with the classification at Page 122 of nursing homes as “community facilities” and “main town centre uses”; these definitions are not consistent with the NPPF. The inclusion of nursing homes within the definition introduces an additional layer of policy control via policies CF1 and CF2, in addition to Policies H6 and H7, which is not justified or effective. The policies would effectively prevent any nursing home development which is not within a town, or local, centre which is not consistent with national policy.	This policy approach has now change to remove reference to nursing homes in the definition of community facilities. Nursing homes are indeed assessed under the policies in the housing chapter and not in this chapter on community facilities.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/012	Community Facilities	CF2 New and re-provided community facilities						I have added my text in one location as it is all sits within the category of Community Facilities. Here is a link to the original MS Word Doc that was formatted as series of tables linking plan text refs to my comments: [Hyperlink added - additional comments from hyperlinked document provided below]	Comment noted.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/043	Community Facilities	CF2 New and re-provided community facilities			6		<p>CF2: New and Re-Provided Community Facilities</p> <p>6. Proposals for all new and re-provided (including modernisation and/or expansion) community facilities should:</p> <p>a. provide a Social Value-Health Impact Assessment (see Policy BFN3); and</p> <p>b. demonstrate that early consultation has been undertaken with the intended operator and users of the space. Community Facilities should be co-designed, from the outset, in consultation with the existing and/or intended users and organisations;</p> <p>Comment</p> <p>It is not clear at what point these activities should take place.</p>	This policy approach has now changed due to the need to provide greater clarity on the application of this clause (formerly CF2.6). Please see the new wording in the implementation text SI2.7.	
Reg18-T-009	Britannia Education Trust	Reg18-T-009/044	Community Facilities	CF2 New and re-provided community facilities			6		<p>Consultation on Silvertown Quays development has not gone to this level of detail and only zones use areas are submitted with the current planning permission.</p>	Comment noted.	
Reg18-T-009	Britannia Education Trust	Reg18-T-009/045	Community Facilities	CF2 New and re-provided community facilities			6		<p>To make community use viable early design briefs, plan layouts, site colocation and defined lease/rental costs are all necessary.</p>	Comment noted.	

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/046	Community Facilities	CF2 New and re-provided community facilities			6			If actual operators of the community facilities are not identified as part of the early design of the site there will be a tendency to have shoehorn community uses into unsuitable locations and layouts.	Comment noted. Policy SI2 does not support speculative facilities for the reasons you set out in your comment. Please see Policy SI2.4.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/047	Community Facilities	CF2 New and re-provided community facilities			6			Square metre allowances in planning permissions is not sufficient to support community uses in an efficient and cost effective manner.	Comment noted. Policy SI2, for the reasons you set out in your comment, includes a comprehensive set of requirements for applications for new social infrastructure. Please see Policy SI2.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/048	Community Facilities	CF2 New and re-provided community facilities			6			The above mentioned comments highlight the need for a proactive approach by LBN in planning obligations requiring early pre-consent operator engagement and outline viable designs assessed by LBN as to their acceptability.	Comment noted. Policy SI2 does require early engagement with users / intended user and operators for the reasons you set out in your comment. Please see Policy SI2.4.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/049	Community Facilities	CF2 New and re-provided community facilities			6			Current practice tends to be hit or miss if the developer wishes to floor this logic as there is no real incentive for them to concern themselves with viability for a community facility space given there is no commercial benefit/liability accruing.	Comment noted. Policy SI2 does not support speculative facilities for the reasons you set out in your comment. Please see Policy SI2.4.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/050	Community Facilities	CF2 New and re-provided community facilities						3.96 New facilities should seek to address gaps in provision, both existing and future. Newham's Community Facilities Needs Assessment (2022) has helped to establish an understanding of who lives in the borough currently and how this may change over time.  Comment  The CFNA provides no real metrics on what	Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include: <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> </ul>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
<ul style="list-style-type: none"> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses,</p>	<p>needs have to be met by the provision of community facilities relative to demand in that area/neighbourhood. This seems a major omission as the mere presence of a community facility does not mean it is adequate to meet demand arising from that community. As a consequence a space allocation in a development might be designated as a community use but prove inadequate to meet demand and/or too small to operate at an affordable level. The proposed legal agreement with LBN or Community Use Agreements may partly address this issue</p>										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/051	Community Facilities	CF2 New and re-provided community facilities					<p>3.98 Community facilities should integrate with the surrounding area and create places where people feel welcome. Newham's community facilities play an important role in providing spaces where people from different backgrounds can meet, socialise and have shared experiences. It is important to plan for, design and manage community facilities to help facilitate social interaction.</p> <p>Comment</p> <p>There is no explanation on how this aim might be implemented, who is deciding and planning what this integration of facilities will look like.</p>	<p>This Policy approach has now changed to make it clearer that we want community spaces to be welcoming which was already a requirement of S12 at point S12.6f. We have now included additional wording at this point to require schemes to facilitate social integration. Please see Local Plan Policy S12.</p>	

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/052	Community Facilities	CF2 New and re-provided community facilities						<p>[Comment on 3.98]</p> <p>Given developers' interests are inherently on maximising land values/sales profits they will have little natural interest in the immediate benefits to their customers buying or renting property on their site. Who is going to require them to contribute to community wide benefits if not via the planning obligation process? The question then arises on how well the local plan is set up to exploit this necessity to leverage community benefit from development rights granted.</p>	Comment noted. Policy BFN4 and the planning obligations sections throughout the plan outline how the plan requires developers to deliver community benefits. As required by national policy this is viability tested to ensure deliverability.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/053	Community Facilities	CF2 New and re-provided community facilities			2			<p>CF2.2 Applicants should consult Newham's Community Facilities Needs Assessment (2022) to ascertain the current provision of community facilities in the borough and whether or not the site is in an area of deficit. A proposals neighbourhood will depend on the type of service it is offering.</p> <p>Comment</p> <p>As stated prior, the CFNA does not provide much by way of community facility area deficit at a neighbourhood level. The isochrones (15 minute walking distances) provide only travel times to listed facilities and not their capacity or capability to meet actual levels and types of needs.</p>	This policy approach has now changed due to the need to provide greater clarity on the studies applicants should consult and the requirement to also consult with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. Please see the new wording in policies SI1, SI2, SI3 and SI4.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/054	Community Facilities	CF2 New and re-provided community facilities			2			Schools, childcare and health clinics are missing from such mapping.	<p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											For social infrastructure we have a statutory duty to provide, or where there are national targets or a planned delivery by the Council, the Local Plan secures and supports this delivery through the neighbourhood policies and site allocations. For all other types of social infrastructure, the Social Infrastructure policies are designed to enable community/charity/market-led community facilities to come forward in the most appropriate locations. This is supported by requirements in the site allocations for developers to deliver community facilities of a type required on their developments, as assessed at the point of delivery.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/055	Community Facilities	CF2 New and re-provided community facilities			2			LBN seems to be relying on developers to assess what is the nature of community need in the area of their development. This is problematic given the lack of metrics in the CFNA to guide them and the inherent conflict of interest in their commercial objectives of maximising returns and reducing exposure to planning obligations.	This policy approach has now changed due to the need to provide greater clarity on the studies applicants should consult and the requirement to also consult with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. Please see the new wording in policies SI1, SI2, SI3 and SI4.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/056	Community Facilities	CF2 New and re-provided community facilities			2			There appears to be no obligation to share with the communities in the neighbourhood how the developers arrive at their assessment of what they need to do to define and meet local need.	This policy approach has now changed due to the need to provide greater clarity on the studies applicants should consult and the requirement to also consult with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. Please see the new wording in policies SI1, SI2, SI3 and SI4.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/057	Community Facilities	CF2 New and re-provided community facilities			2			[There appears to be no obligation to share with the communities in the neighbourhood how the developers arrive at their assessment of what they need to do to define and meet local need.] This may be shrouded in commercial confidentiality along with other development obligations negotiated with LBN planners. Public consultation on the Silvertown Quays development application provided no information on what community facilities need can be assessed or how it was going to be met on or off site by development obligations and/or defined proposals.	This policy approach has now changed due to the need to provide greater clarity on the studies applicants should consult and the requirement to also consult with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility. Please see the new wording in policies SI1, SI2, SI3 and SI4.
Reg18-E-148	City of London	Reg18-E-148/023	Community Facilities	CF2 New and re-provided community facilities						Whilst we support the overarching vision of the draft Local Plan to create 15-minute neighbourhoods, we do note that Draft Policy DCF2 seeks to take a town-centre first approach to the delivery of new community facilities smaller than 1000sqm GIA.	This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.

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Reg18-E-148	City of London	Reg18-E-148/024	Community Facilities	CF2 New and re-provided community facilities			CF2.2 (d)			We would note, however, that not all community facilities will be best-suited for town centre and local centre locations. For example, those community facilities which provide sporting/exercise facilities or youth facilities, may be better placed closer to the facilities with which they are associated, such as a park or playing pitches. As such, we consider the wording of Part (d) of Draft Policy CF2.2 needs to be more nuanced to reflect that a sequential hierarchy is dependent upon the nature of the community facility proposed.	This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.
Reg18-E-148	City of London	Reg18-E-148/025	Community Facilities	CF2 New and re-provided community facilities			CF2.2 (d)			City of London are exploring the potential to deliver a community facility on the [West Ham Park Nursery] Site, with uses which could be linked to West Ham Park's value as a place for sports recreation, green space and biodiversity. The current draft wording to Part (d) of Draft Policy CF2.2 would stifle this ambition.	This policy approach has now changed to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/051	Community Facilities							The final plan should make it very clear that planning policies will protect and enhance the services and facilities available to our present marginalised communities. These communities must not be abandoned to the market driven gentrification that the draft plan now implies.	Comment noted. Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, business and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town

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											centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also requires that all significant developments are masterplanned alongside the existing community - so that the community are central to shaping the borough as it changes.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/055	Community Facilities							Social infrastructure and places of worship Given the scarcity of non-residential premises in many localities of the Borough, Newham should prioritise protecting space for social infrastructure, including places of worship but equally ensure that the provision of schools, social amenities and properly staffed health and care facilities should be a must for development to take place.	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting the delivery of new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.

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Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/056	Community Facilities							The Council should recognise the legitimacy of places of worship being included within section 106 agreements for new developments. <b>The community infrastructure levy</b> may also be used to support the provision of places of worship.	<p>Comment noted. The term community facility used in the Local Plan encompasses places of worship. The site allocations in the Neighbourhood chapter have been updated to include, where in areas of deficiency, the need to deliver community facilities. Faith facilities could therefore come forward and be delivered as part of these new development sites to meet this new policy requirement.</p> <p>The use of Community Infrastructure Levy is guided by the Council's budget setting process.</p>
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/057	Community Facilities							As part of any <b>equality impact assessments</b> , the Council should examine planning application data to assess whether rates of planning refusal are higher for some faith groups, as well as for other groups with 'protected characteristics. If there are discrepancies in the refusal rates, the council should act to address any potential inequalities in the planning process.	<p>Comment noted. We are undertaking an Equalities Impact Assessment on the Local Plan, this is published as part of the Integrated Impact Assessment alongside the Regulation 19 consultation. Please note, we do not collect equalities data on applicants and would want to avoid drawing conclusions based on assumptions or incomplete data. We are working with colleagues in the corporate policy team to develop an improved methodology to consider equalities considerations within individual planning applications.</p> <p>The policies in the Social Infrastructure Chapter apply, irrespective to faith group and are neutral on the intended faith of the user.</p> <p>It should also be noted that following feedback from faith groups and other community organisations as well as the findings of the Community Facilities Needs Assessment, policy SI2 offers more flexibility on the location of</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											community facilities than the adopted Local Plan (2018). A change to this policy approach has been also made due to the need to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy S12.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/064	Community Facilities							Public toilets There has been decreased access to public toilets in the borough. The 15-minute neighbourhood must have provision related to public toilets and these should not be left to the "community toilets" plan brought in under the former Administration. Under this scheme toilet provision was largely left to the good will of local commercial businesses. London Plan (2021) Policy S6 provides a consistent strategic framework for boroughs to require free, publicly accessible toilets in development proposals. This must be implemented in Newham and mentioned in the draft local plan as a key priority: all large scale developments (150 units plus) should automatically provide accessible and free public toilets. The local plan also needs a policy for public toilet provision, for example through community toilet schemes for smaller developments.	This policy approach has now changed to ensure better alignment with London Plan Policy S6. Policy S12.7(l) already requires the provision of free, publically available toilets within community facilities. This requirement was further expanded on, in the Reg 18 Implementation text. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, to reference the British Standard for 'Changing Spaces' and to add information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for S12. In addition policy HS2 encourages the delivery of new toilets in new developments within Town and Local Centres.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben,	Reg18-E-151/065	Community Facilities							Public toilets There has been decreased access to public toilets in the borough. The 15-minute neighbourhood must have provision related to public toilets and these should not be left to the "community toilets" plan brought in under the former Administration. Under this	This policy approach has now changed to ensure better alignment with London Plan Policy S6. Policy S12.7(l) already requires the provision of free, publically available toilets within community facilities. This requirement was further expanded on, in the Reg 18 Implementation text. However, for clarity, and to

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
	Cllr Master, Cllr Sarley Pontin									scheme toilet provision was largely left to the good will of local commercial businesses. London Plan (2021) Policy S6 provides a consistent strategic framework for boroughs to require free, publicly accessible toilets in development proposals. This must be implemented in Newham and mentioned in the draft local plan as a key priority: all large scale developments (150 units plus) should automatically provide accessible and free public toilets. The local plan also needs a policy for public toilet provision, for example through community toilet schemes for smaller developments.	show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, to reference the British Standard for 'Changing Spaces' and to add information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2. In addition policy HS2 encourages the delivery of new toilets in new developments within Town and Local Centres.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/066	Community Facilities							Public toilets There has been decreased access to public toilets in the borough. The 15-minute neighbourhood must have provision related to public toilets and these should not be left to the "community toilets" plan brought in under the former Administration. Under this scheme toilet provision was largely left to the good will of local commercial businesses. London Plan (2021) Policy S6 provides a consistent strategic framework for boroughs to require free, publicly accessible toilets in development proposals. This must be implemented in Newham and mentioned in the draft local plan as a key priority: all large scale developments (150 units plus) should automatically provide accessible and free public toilets. The local plan also needs a policy for public toilet provision, for example	This policy approach has now changed to ensure better alignment with London Plan Policy S6. Policy SI2.7(i) already requires the provision of free, publically available toilets within community facilities. This requirement was further expanded on, in the Reg 18 Implementation text. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, to reference the British Standard for 'Changing Spaces' and to add information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2. In addition policy HS2 encourages the delivery of new toilets in new developments within Town and Local Centres.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										through community toilet schemes for smaller developments.	
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/010	Community Facilities	CF2 New and re-provided community facilities					<p>Draft Policy CF2 should explicitly support the endeavours of non-profit organisations seeking to re-provide community facilities for the benefit of the broader community without the need to justify the location or floorspace amount where a like-for-like provision is being provided.</p> <p>Whilst we support in principle the newly drafted Policy CF2 (New and re-provided Community Facilities), the policy should be explicit in supporting the re-provision of community facilities and make it simpler for charities such as the River Christian Centre to deliver modernised facilities. We support the following findings within the Community Facilities Needs Assessment 2022 (page 23), which recognises the need for community facilities within the wider neighbourhood, recommending to: Create flexibility within the Town Centre First approach to allow provision of community facilities outside of town centres to support the network of 15-minute neighbourhoods and provide amenities for areas with new housing developments.</p>	<p>Comment noted. With regard to re-provision of existing community facilities, Policy SI1 is clear that existing community facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that certain criteria are met. Policy SI2 supports the reconfiguration or expansion of community facilities outside of a Town or Local Centre where it can be demonstrated it meets the criteria in SI2. This means it could not increase footfall, would need to have a similar catchment, could not impact negatively on the transport network and it would need to be neighbourly. With regard to Town Centre First this policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.</p>	

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Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/012	Community Facilities	CF2 New and re-provided community facilities						Our Site's redevelopment will provide the capacity to address both the existing under-provision of community infrastructure and future demands from new residents in the wider regeneration area. The scheme builds upon RCC's 125-year history by delivering a modern, inclusive, and community-focused mix-use centre that meets a wide variety of local residents' needs in a shared location, encouraging social integration and common identity to help build greater cohesion and resilience to this part of Newham.	Comment noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/083	Community Facilities	CF2 New and re-provided community facilities						Community facilities - more medical centres	<p>The Local Plan must plan for all types of social infrastructure. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>The need for health facilities, across the Plan period, have been informed through partnership working with HUDU and NHS partners.</p>



<b>Comment Response</b>	For social infrastructure we have a statutory duty to provide, or where there are national targets or a planned delivery by the Council, the Local Plan secures and supports this delivery through the neighbourhood policies and site allocations.
<b>Comment</b>	
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/084	Community Facilities	CF2 New and re-provided community facilities						More GPs with more flats	<p>The Local Plan must plan for all types of social infrastructure. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>The need for health facilities, across the Plan period, have been informed through partnership working with HUDU and NHS partners.</p> <p>For social infrastructure we have a statutory duty to provide, or where there are national targets or a planned delivery by the Council, the Local Plan secures and supports this delivery through the neighbourhood policies and site allocations.</p>
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/100	Community Facilities	CF2 New and re-provided community facilities			6			General statement in CF2 6g&k 'inclusive and accessible' - a definition of inclusion in terms of the Local plan is needed and note it is to respond to the specific demographic where the site is in Newham would be helpful here.	Comment noted. The term 'inclusive and 'accessible' has been added to the Local Plan glossary as its use is wider than this chapter. Further detail has also been provided in the implementation text to provide clarification on the expectations related to public toilets.

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Reg18-E-082	Resident	Reg18-E-082/040	Community Facilities	CF2 New and re-provided community facilities				3.96		<ul style="list-style-type: none"> <li>Page.128 (3.96). There is a reference to the Community Facilities Needs Assessment (2022), however the hyperlink mentions the Strategic Leisure Facility Needs Assessment (2017). This uses national data, which does not reflect the community in Newham which is highly diverse. There is a focus on using activity data from Sports England to determine sports and leisure needs however it is well recognised that Sport England survey data is very limited, biased in terms of who responds and <b>does not reflect diverse needs of a community such as Newham</b>. Further the quantum of community facilities does not correlate with population density and population core areas of the borough including proposed 15-minute neighbourhoods.</li> </ul>	Noted. The link in the Reg 18 published Local Plan incorrectly linked to the Local Plan (2018) evidence base. This will be corrected in the Reg 19 Local Plan. Since Regulation 18 Newham, we have completed the Built Leisure Needs Assessment (2024). It has considered access to leisure facilities by foot and public transport and reflects the needs of the people living in Newham through assessment of its demographics.
Reg18-E-082	Resident	Reg18-E-082/041	Community Facilities	CF2 New and re-provided community facilities				Justification general		<ul style="list-style-type: none"> <li>Page.128. Accessible public toilets. <b>There has been decreased access to public toilets in the borough</b>, it is critical for the elderly and those with disabilities and families with young children. They enable these groups to participate in public life such as to go out and shop or explore the local area. The 15-minute neighbourhood must have provision of public toilets. London Plan (2021) Policy S6 provides a consistent strategic framework for boroughs to require free, publicly-accessible toilets in development proposals. This must be implemented in Newham and mentioned in the Draft Local Plan as a key priority, all large-scale developments (150 units plus)</li> </ul>	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy SI2.6(k) already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										should automatically provide accessible and free public toilets.	
Reg18-E-139	Resident	Reg18-E-139/029	Community Facilities	CF2 New and re-provided community facilities						CF2 includes existing community facilities that need 'reconfiguring' modernisation or expansion (point 4 and 6 p127) this is effectively the vast majority of charitable community facilities, rendering CF1 problematic as it assumes that existing community facilities do not need adapting to be sustainable. 49% of community buildings are places of worship and this would probably affect the majority of these.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 (formerly CF2) would allow reconfiguration and modernisation of existing places of worship. Policy SI2, as drafted, permits such work but has clauses to ensure that such development does not cause an unacceptable impact on the surrounding neighbourhood, such as transport and highways impacts.
Reg18-K-037	Resident	Reg18-K-037/005	Community Facilities	CF2 New and re-provided community facilities					CF2.7	Significant investment in the arts in Newham is required to ensure the future growth of theatres in addition to beautifying areas with art, planting social spaces and maintaining them. <b>Maintenance of refuse collection is key too in the borough.</b> If education and policing of standards and expectations is undertaken the beauty and history of the area can be preserved.	Comment noted. Policy SI3 highlights the importance of protecting Newham's arts facilities and supporting their growth. The policies in the Green and Water Spaces Chapter of the Local Plan support the protection and improvement to the planting of the borough's social spaces and their maintenance.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-047	Resident	Reg18-K-047/007	Community Facilities	CF2 New and re-provided community facilities						These kind of facilities are really needed in the Royal Docks and Beckton area, where they are currently severely lacking [this rep was made twice by the same person in same location on Konveio]	This policy approach has now changed to provide better guidance on where we would like to see new social infrastructure to come forward. Please see the following neighbourhoods and their relevant site allocations: N1 North Woolwich, N2 Royal Victoria, N3 Albert North and N11 Beckton.
Reg18-T-108	Resident	Reg18-T-108/002	Community Facilities	CF2 New and re-provided community facilities						[Keep it]	Support noted.
Reg18-T-123	Resident	Reg18-T-123/002	Community Facilities	CF2 New and re-provided community facilities		Move to CF3 ?				[Add to it] add continued maintenance to Tennis court in Little Ilford park.	Comment noted. We have provided the Parks and Leisure teams with your feedback regarding the tennis court in Little Ilford Park.
Reg18-T-123	Resident	Reg18-T-123/004	Community Facilities	CF2 New and re-provided community facilities		Which park ? Move to CF3				[Add to it] switch off flood light in the basketball court which is on 24/7.	Comment noted. We have provided the Parks team with your comment.
Reg18-T-123	Resident	Reg18-T-123/005	Community Facilities	CF2 New and re-provided community facilities		Move to CF3 ?				[Add to it] do not allow dogs in the tennis courts in the parks.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding allowing dogs on tennis courts, is not provided in the Local Plan, nor is it something the Local Plan can deliver. We have provided the Parks team with your comments regarding the control of dogs on the borough's tennis courts.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-126	Resident	Reg18-T-126/005	Community Facilities	CF2 New and re-provided community facilities						[Keep it]	Support noted.
Reg18-T-018	Resident	Reg18-T-018/010	Community Facilities	CF2 New and re-provided community facilities						[Add to it] More social gatherings places	A change to this policy approach has not been made. We did not consider this change to be necessary as the Chapter on Social Infrastructure already sets out the importance of social meeting places for mental health and wellbeing. The policies in this chapter seek to protect existing community facilities and guides where new facilities are needed, including the questions to consider and address when delivering such spaces.
Reg18-T-019	Resident	Reg18-T-019/005	Community Facilities	CF2 New and re-provided community facilities						[Add to it] Unclear how much work has been with done with local communities	The consultant, Publica, who undertook the Community Facilities Needs Assessment (2022), conducted six typology workshops with people or manage or operate a facility and VCS to understand how facilities spaces are used and support soft infrastructure and outline any opportunities, challenges and risks for community services and assets. The attendees of these workshops are set out on page 60 of the report and include representative from the voluntary community sector, community centres and libraries, places of worship and faith groups, cultural facilities and pubs, exhibition spaces and halls and youth zones. In addition to the workshops, Publica and Planning Policy officers from Newham developed an e-questionnaire using the Typeform platform, for people who manage or operate a facility to provide detailed

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											information on the design, use and management of facilities across the borough. The e-questionnaire also created opportunity for service providers to provide information on how they use and engage with facilities, as well as those who are looking for space. The e-questionnaire ran from the 1st February to the 8th March 2022 and was a key source of information for the facilities audit. There were 76 responses in total (the Typeform report is included in Appendix C for the Assessment): <ul style="list-style-type: none"> <li>• 33 (43%) responses managed or operated a facility.</li> <li>• 26 (34%) responses managed an organisation that used a facility.</li> <li>• 17 (22%) responses managed an organisation but did not currently have a facility and was in need of one.</li> </ul>
Reg18-T-034	Resident	Reg18-T-034/023	Community Facilities	CF2 New and re-provided community facilities						[Add to it] We need a wider range of affordable community facilities in each of the neighbourhoods: libraries, meeting space, exercise hubs, yoga spaces.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 and SI3 already set out the requirement for community facilities to undertake a Social Value-Health Impact Assessment (Policy BFN3) and that facilities should enter into a Community Use Agreement, secured through a legal agreement with the Council. This is to ensure the long-term use and affordability of facilities.
Reg18-T-038	Resident	Reg18-T-038/003	Community Facilities	CF2 New and re-provided community facilities						[Add to it] Bring about multicultural facilities and dare to stand up to religious places cropping up every few buildings, dividing people into their own little communities, who can never seem to change unless their lives depended on it!	Comment noted. A range of community facilities play an important role in all our lives. The Local Plan was informed by the Social Integration Strategy and seeks to ensure a range of community facilities are protected and delivered in suitable locations across the borough.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-043	Resident	Reg18-T-043/005	Community Facilities	CF2 New and re-provided community facilities						[Add to it]	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-057	Resident	Reg18-T-057/020	Community Facilities	CF2 New and re-provided community facilities						[Add to it] X	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-058	Resident	Reg18-T-058/025	Community Facilities	CF2 New and re-provided community facilities						[council should take some presses and rent it to upcoming entrepreneurs that will help them,] community centres,	This policy approach has now change to provide better guidance on what we consider an affordable space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.
Reg18-T-072	Resident	Reg18-T-072/015	Community Facilities	CF2 New and re-provided community facilities						[Add to it] Ensure all age groups esp. older people over 60s are included in your masterplans for communities facilities and activities like library and reading rooms, quiet rooms etc. Not just for children. Older people also need to have designated spaces for their needs.	This policy approach has now changed due to the need to ensure we are being clear about our expectations of the co-design process. This included the need to speak with and consider the needs of different age groups. Please see the new wording in SI2 implementation text.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-073	Resident	Reg18-T-073/001	Community Facilities	CF2 New and re-provided community facilities						[Add to it] The policy is focused on council run community facilities and doesn't factor-in/engage with all of the facilities in the borough run by the faith and voluntary sector.	A change to this policy approach has not been made. We did not consider this change to be necessary because the Social Infrastructure chapter already includes a table of those facilities covered by the policies in the chapter. This includes religious infrastructure. In the introduction to this chapter we make clear that the facilities listed in the table are not intended to be exhaustive and that other facilities may be considered community facilities. Furthermore, we set out that this chapter seeks to protect and promote community facilities, both those in public and private ownership, to meet the needs of Newham's growing population.

Reg18-T-074	Resident	Reg18-T-074/004	Community Facilities	CF2 New and re-provided community facilities							<p>[Add to it] The policy is focused on council run community facilities and doesn't factor in/engage with all of the facilities in the borough run by the faith and voluntary sector.</p>	<p>The Local Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (S11) and supporting new social infrastructure (S12, S13 and S14). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing social infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.</p> <p>The Local Plan must plan for all types of social infrastructure. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham's social infrastructure we have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough's existing community facilities and considers how the future growth of Newham's neighbourhoods may influence the need for new</p>
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											<p>services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2023), Playing Pitch Strategy (2023), Comment noted. Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p> <p>For social infrastructure we have a statutory duty to provide, or where there are national targets or a planned delivery by the Council, the Local Plan secures and supports this delivery through the neighbourhood policies and site allocations. For all other types of social infrastructure, the Social Infrastructure policies are designed to enable community/charity/market-led community facilities to come forward in the most appropriate locations. This is supported by requirements in the site allocations for developers to deliver community facilities of a type required on their developments, as assessed at the point of delivery.</p> <p>The Community Facilities Needs Assessment</p>
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										<p>(2022) can only provide a snapshot in time about the provision of the particular types of social infrastructure which the evidence base was designed to address (as set out above). The need for certain types of social infrastructure will naturally change over time. However, it will provide a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.</p> <p>Through these mechanisms we will ensure that community facilities, of the type required, are delivered where they are wanted and where there is a provider to operate them</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-088	Resident	Reg18-T-088/002	Community Facilities	CF2 New and re-provided community facilities						[Change it] lack of public toilets,	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy SI2.6(k) already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2.
Reg18-T-088	Resident	Reg18-T-088/003	Community Facilities	CF2 New and re-provided community facilities						[Change it] no cycle shed,	A change to this policy approach has been made to direct the reader to Policy T3: Transport behaviour change. Policy T3.3 addresses the need for all new development to deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan (2021) standards). Policy SI2.g now directs the reader to Policy T3, this change has also been made to the Implementation text for this policy.
Reg18-T-088	Resident	Reg18-T-088/004	Community Facilities	CF2 New and re-provided community facilities						[Change it] no CCTV	Unfortunately it was not clear what change you wanted to make to this part of the Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-105	Resident	Reg18-T-105/009	Community Facilities	CF2 New and re-provided community facilities						[Keep it]	Support noted.
Reg18-E-092	Royal Docks	Reg18-E-092/067	Community Facilities	CF2 New and re-provided community facilities			CF2.1d			The Site [N4.SA1 Royal Albert North] provides an opportunity to connect with water through water-based recreation, supported through improved water access and facilities that could grow increased local participation and complement new development proposals. In particular, re-development and expansion of the existing Regatta Centre could provide the infrastructure needed to deliver this.. However, policy CF2 (1d) is resisted, as the Regatta Centre does not currently occupy a Town or Local Centre but serves a distinct and well used community need that could be improved and expanded.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2, as it had been drafted at Regulation 18, and also at Regulation 19 would allow for an expansion of the existing Regatta Centre. Expansion outside of a Town or Local Centre is supported where it can be demonstrated it meets the criteria in SI2. This means it could not increase footfall, would need to have a similar catchment, could not impact negatively on the transport network and it would need to be neighbourly. Policy SI3 would also apply to the Regatta Centre since it is a leisure use.
Reg18-E-118	Sport England	Reg18-E-118/022	Community Facilities	CF2 New and re-provided community facilities						Policy CF2 aligns with the Enhance and Provide objectives of Sport England's Planning Policy and is, therefore, supported.	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/023	Community Facilities	CF2 New and re-provided community facilities			7.b			The provision in 7. b. that community facilities are required to enter a Community Use Agreement is also welcomed.	Support noted.

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Reg18-E-118	Sport England	Reg18-E-118/024	Community Facilities	CF2 New and re-provided community facilities			7.b			There is a free online resource from Sport England called Use Our School that offers further guidance and information for local authorities and other providers on how to make the best use of facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites but can be applicable to other community facilities as well. 'Use Our School' can be accessed at <a href="http://www.sportengland.org/useourschool">www.sportengland.org/useourschool</a>	This wording change has been made. Please see the new wording in the implementation text for both SI2 and SI4 which now reference the Use Our Schools online resource.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/063	Community Facilities	CF2 New and re-provided community facilities						[Appendix A] The policy is largely supported.	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/064	Community Facilities	CF2 New and re-provided community facilities			CF2.6k			[Appendix A] However, under Part 6(k), it is requested that "where feasible" is included to reflect that some facilities may not be of a scale that can provide all of the amenities set out.	This policy approach has now changed to ensure we are being proportionate in our requirement for public toilets. Policy SI2 now include reference to a threshold for where we require the provision of public toilets. It also stipulates that where feasible smaller development it will be required to provide public toilets. Please see the new wording in Policy SI2.
Reg18-E-148	City of London	Reg18-E-148/026	Community Facilities	CF3 Cultural and leisure facilities						We support the principles of Draft Policy CF3 (culture and leisure facilities) which outlines that development of new leisure facilities will be supported and encouraged in line with Draft Policy CF2.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-039	Community Group Representative	Reg18-T-039/001	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] Leisure and cultural facilities must have a direct connection to planning applications for housing developments. We can't build more housing without tying in community facilities.	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-T-041	Community Group Representative	Reg18-T-041/005	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] More leisure facilities and cultural facilities.	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-T-041	Community Group Representative	Reg18-T-041/006	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] More use of open spaces and parks.	Comment noted. The Green and Water Spaces Chapter seeks to make best use of our open spaces and parks, this includes making them available for community activities. Please see policies GWS1 and GWS5 in particular.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/049	Community Facilities	CF3 Cultural and leisure facilities						Why do we still have to go online to book swimming? Why can't we just turn up!! Why is it limited? Often closed	Comment noted. We have provided the Leisure team with your comments.

Reg18-E-051	Resident	Reg18-E-051/002	Community Facilities	CF3 Cultural and leisure facilities						<p>We all know that good quality housing is needed in Newham BUT building housing at the expense of leisure facilities is extremely short sighted. The people of Newham already suffer disproportionately from poor health, obesity etc so how can reducing access to leisure and fitness facilities be the answer? It makes no sense.</p> <p>I have lived near Abbey Arms for 40 years and have raised 4 children in this neighbourhood. The Balaam Leisure Centre has always been an essential facility. All my children have learnt to swim there and as an adult I have regularly used both the swimming pool and the gym facilities. The alternative sites (Newham Leisure Centre, East Ham) are too far away to be convenient.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate following the completion of the Built Leisure Needs Assessment (2024). The forced closure of Balaam Leisure Centre in 2018 exacerbated an already existing deficit of built leisure facilities within the borough. The Council subsequently commissioned a Built Leisure Needs Assessment (BLNA) to provide an evidence base to support the emerging Local Plan and to inform decisions on the need for the improvement of leisure services across Newham. The BLNA (2024) considers the quality of the existing provision and how the projected growth over the Local Plan period (to 2038) will impact the need for future provision and where such facilities should be located to meet demand.</p> <p>The BLNA (2024) is published alongside the Local Plan Regulation 19 consultation. The Assessment identified a number of findings, including:</p> <ul style="list-style-type: none"> <li>• Insufficient pay and play accessible sports hall, swimming pools and health and fitness provision to meet current and future demand (by 2038);</li> <li>• Significant under-supply of sports halls, swimming pools and health and fitness provision, both now and to 2038; the level of under-supply of sports halls and swimming pools is such that it will only be addressed if new facilities are developed.</li> <li>• A recommendation to invest in new facilities in Canning Town and Beckton, including swimming pools, sports hall and fitness.</li> <li>• A recommendation to invest in a new leisure centre on the existing Newham Leisure Centre but on a larger scale than the current facility.</li> </ul> <p>Refurbishing and bringing back into use the Balaam Leisure Centre is considered uneconomical and the site would not be able to</p>
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											<p>provide the range of services needed to serve local residents in an easily accessible location. The close proximity of the existing Newham Leisure Centre and the need for a new leisure centre in Canning Town as set out in the BLNA (2024), would better meet the needs of residents in the borough.</p> <p>It is recognised that the closure of the Balaam Leisure centre has meant the loss of a local facility for the residents of Plaistow, however, the provision of new facilities in Canning Town alongside with the existing facilities already available at the Newham Leisure Centre, will compensate for this and both locations are readily accessible by both walking and public transport.</p> <p>In 2019, the Council consulted in with residents on options for the future of Balaam Leisure Centre including the release of the closed site for affordable housing development. Having given due consideration to the consultation responses and the options proposed as a result, Cabinet on 20 July 2023 made a determination to close the site Balaam site for leisure purposes.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-047	Resident	Reg18-K-047/004	Community Facilities	CF3 Cultural and leisure facilities						Entertainment & culture facilities are needed in the east/southeast of the borough where currently there are none or very few (especially since closure of Showcase cinema which was poorly located away from where people wanted to go) [originally submitted in response to clause 4 of BNF1 Spatial Strategy]	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-T-108	Resident	Reg18-T-108/003	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] Have a sports centre in Stratford	Comment noted. The Regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) which is evidence to support our policy approach to the borough's leisure needs.
Reg18-T-123	Resident	Reg18-T-123/007	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] [provide café in Little Ilford park,] reopen toilet facilities	A change to this policy approach has not been made. We did not consider this change to be necessary appropriate as the Local Plan cannot influence the opening hours of public toilets in our existing parks. Your comment, regarding the desire to re-open the public toilets in Little Ilford Park has been passed on to the Parks Team.
Reg18-T-126	Resident	Reg18-T-126/006	Community Facilities	CF3 Cultural and leisure facilities						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-019	Resident	Reg18-T-019/006	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] There are not enough gyms	Comment noted. The Regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) which is evidence to support our policy approach to the borough's leisure needs.
Reg18-T-019	Resident	Reg18-T-019/007	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] hopefully more transparency pls	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-038	Resident	Reg18-T-038/004	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] Joint venture between council and community is required for healthier and more cohesive communities. Not just council and businesses for the purposes of making profit.	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-057	Resident	Reg18-T-057/021	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] X	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.
Reg18-T-072	Resident	Reg18-T-072/016	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] Ensure older people's needs are included in design and provision of cultural, educational and co-working hubs and F&B facilities.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of facilities which older people may use. Policy SI2 requires applicants to demonstrate that early consultation has been undertaken with the intended operator and users of the space.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											Community Facilities should be co-designed, from the outset, in consultation with the existing and/or intended users and organisations.
Reg18-T-072	Resident	Reg18-T-072/017	Community Facilities	CF3 Cultural and leisure facilities					Look at again	[Add to it] All should be affordable since Westfield is very expensive for locals and visitors who are pensioners and low-income families.	This policy approach has now change to provide better guidance on what we consider an affordable space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.
Reg18-T-088	Resident	Reg18-T-088/005	Community Facilities	CF3 Cultural and leisure facilities						[Keep it] Need more leisure centers because sometimes too long waiting time	Comment noted. The Regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) which is evidence to support our policy approach to the borough's leisure needs.
Reg18-T-103	Resident	Reg18-T-103/017	Community Facilities	CF3 Cultural and leisure facilities						[Change it] More cultural spaces. The heritage of locals is bein ignored	A change to this policy approach has not been made. The Local Plan addresses the need for cultural facilities through protecting existing facilities (SI1) and supporting new facilities (SI2 and SI3).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-105	Resident	Reg18-T-105/010	Community Facilities	CF3 Cultural and leisure facilities						[Keep it]	Support noted.
Reg18-T-109	Resident	Reg18-T-109/037	Community Facilities	CF3 Cultural and leisure facilities		Move to CF4 ?				[Add to it] Absolutely vital to Newham residents especially crèche	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy S14 and Policy J4 of the Local Plan at Regulation 18 made provision for the need to deliver childcare.
Reg18-T-109	Resident	Reg18-T-109/038	Community Facilities	CF3 Cultural and leisure facilities						[Add to it] Absolutely vital to Newham residents especially [crèche] and fitness needs	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy S14 and Policy J4 of the Local Plan at Regulation 18 made provision for the need to deliver childcare.
Reg18-E-118	Sport England	Reg18-E-118/002	Community Facilities	CF3 Cultural and leisure facilities						Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for sport participation and physical activity provision now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<a href="https://www.sportengland.org/guidance-and-support/facilities-andplanning/planning-sport">https://www.sportengland.org/guidance-and-support/facilities-andplanning/planning-sport</a>	
Reg18-E-118	Sport England	Reg18-E-118/003	Community Facilities	CF3 Cultural and leisure facilities						Sport England have reviewed the Draft Local Plan documents in light of these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF) and does not consider that document is justified, complies with National Policy and positively plans for sport. As a result, Sport England does not consider that document is sound at this stage.	Comment noted. The Regulation 18 sporting facility allocations and policies that relate to sporting facilities were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest requirements for sporting facilities which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024) which is evidence to support our policy approach to the borough's sporting needs. We have worked closely with our appointed consultants for the Built Leisure Needs Assessment (2024) and those for the Playing Pitch Strategy (2024) and Sport England



<b>Comment Response</b>	between Regulation 18 and 19 to ensure we are justified in our approach and meet the requirements of the NPPF.
<b>Comment</b>	
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/004	Community Facilities	CF3 Cultural and leisure facilities						<p>The NPPF requires each Local Plan to address the spatial implications of economic, social and environmental change based on an adequate, up-to-date and relevant evidence base. The NPPF, at paragraph 98, requires that: <i>“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”</i> Sport England consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Local Plan and these should be based on a robust and up-to-date evidence base, such as Playing Pitch and Built Facility Strategies, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to address current deficits and meet demand from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within Newham and therefore should direct the objectives and policies of the Local Plan.</p>	<p>Comment noted. Since Regulation 18 Newham has worked with Sport England on its Playing Pitch Strategy (2024) and Built Leisure Needs Assessment (2024) both of which will be published alongside our Regulation 19 consultation. These two pieces of work have been used to inform the Regulation 19 Local Plan.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-118	Sport England	Reg18-E-118/005	Community Facilities	CF3 Cultural and leisure facilities						As noted in the document, the Council are currently developing both a Built Leisure Needs Assessment and a Playing Pitch Strategy which should provide robust and up-to-date evidence bases for any emerging policies. Sport England does welcome that the Council have begun this process and does intend to provide support throughout the strategies development however since, at the time of writing, these strategies have not been completed Sport England have no alternative than to consider that the policies that relate to sport facilities, including those that advocate new, improved/reconfigured or loss of sport facilities, are not based on robust and upto- date strategies therefore it has to consider that the policies are not sound at this stage.	Comment noted. The Regulation 18 sporting facility allocations and policies that relate to sporting facilities were informed by the early modelling work for the Built Leisure Needs Assessment. This has since been refined and finalised and has informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) which is evidence to support our policy approach to the borough's leisure needs. We have worked closely with our appointed consultants for the Built Leisure Needs Assessment (2024) and those for the Playing Pitch Strategy (2024) and Sport England between Regulation 18 and 19 to ensure we are sound in our approach and meet the requirements of the NPPF.
Reg18-E-118	Sport England	Reg18-E-118/006	Community Facilities	CF3 Cultural and leisure facilities						Once the Built Leisure Needs Assessment and a Playing Pitch Strategy have been completed Sport England expects that the policy and site recommendations from these documents inform the Vision, Objectives, Policies and Neighbourhood/site allocations of the Local Plan.	Comment noted. The Regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. Please see Newham's Built Leisure Needs Assessment (2024) and Playing Pitch Strategy (2024) which is evidence to support our policy approach to the borough's leisure needs. This evidence base has been refined and finalised and both have informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations .
Reg18-E-118	Sport England	Reg18-E-118/025	Community Facilities	CF3 Cultural and leisure facilities						On the basis that the Council's emerging strategies highlighted above seek to protect facilities, Sport England support the protection stance.	Support noted.

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Reg18-E-118	Sport England	Reg18-E-118/026	Community Facilities	CF3 Cultural and leisure facilities					CF3.1	That said, it is concerned with the comment in CF3.1 as it indicates that sites would only be protected if viable which is different to being needed as stated in the policy and surplus as stated in the NPPF, Paragraph 99. Sport England advises that this is made clear in CF3.1.	This wording change has been made, see Policy SI3 which now aligns with the wording in Paragraph 99 of the NPPF (2023).
Reg18-E-118	Sport England	Reg18-E-118/027	Community Facilities	CF3 Cultural and leisure facilities					CF3.2	CF4.2 [CF3.2] quotes the emerging Built Leisure Needs Assessment which is welcomed but Sport England recommends that the emerging Playing Pitch Strategy should also be mentioned as a development could have an impact on playing fields, including artificial grass pitches.	This wording change has been made, see Policy SI3 Implementation text.
Reg18-E-118	Sport England	Reg18-E-118/028	Community Facilities	CF3 Cultural and leisure facilities					CF3.2	Sport England welcomes the acknowledgement in CF4.2 [CF3.2] that school sports, colleges, community centres and commercial schemes could also provide community sport facilities and these can be secured for community use through a Community Use Agreement (as per the requirement of Policy CF2).	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/065	Community Facilities	CF3 Cultural and leisure facilities			MOVE BFN:4			[Appendix A] The requirement for a Social Value and Health Impact Assessment is supported and could be integrated into a Reserved Matters Specification for the Silvertown Outline Component. The emerging policy refers to the need to adhere to Newham's "Cultural Passport Scheme". Further explanation of the Cultural Passport Scheme is required in the supporting text.	Support noted. This policy approach has now changed due to the cultural passport being an emerging Newham initiative. Please see the new wording in Policy SI3 which has moved this requirement to the implementation text because further details of the cultural passport scheme, at this point, are not known.

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Reg18-T-054	Theatre Trust	Reg18-T-054/004	Community Facilities	CF3 Cultural and leisure facilities						[Keep it] We support this policy in line with our comments in relation to Policy CF1, and welcome that there is additional policy for Newham's valued cultural facilities.	Support noted.
Reg18-T-104	Works in borough	Reg18-T-104/004	Community Facilities	CF3 Cultural and leisure facilities						[Keep it]	Support noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/005	Community Facilities	CF4 Education and childcare facilities						<p>[Add to it] CF4: Education and Childcare Facilities</p> <p>Plan Reference page 137</p> <p>Comment</p> <p>2. The delivery of new educational facilities to meet changing pupil place needs will be secured through:</p> <ul style="list-style-type: none"> <li>a. ensuring the education facility is delivered in the appropriate phase of development;</li> <li>b. securing the long-term option to deliver an education facility on specified site allocations; and</li> <li>c. requiring a flexible design so the facility can grow incrementally as pupil numbers increase.</li> </ul> <p>The mechanism by which these 3 aims are to be achieved is not clear.</p> <p>[Originally submitted in response to CF1]</p>	This policy approach has now changed due to the need to provide greater clarity on the approach to providing education space. Please see Policy SI4 and its implementation text.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/006	Community Facilities	CF4 Education and childcare facilities			2			<p>[Add to it] Mention is made of a child yield model and GLA School Roll projection Service in the A School Place Planning Strategy 2022 to 202. Two issues arise from the use of these methods:</p> <p>The primary planning areas used to show forecast supply and demand projections cover Beckton and Royal Docks as a single entity. The model assumes differences in supply and demand can be balanced over this area but this is unrealistic given the need for local provision (15 minute neighbourhoods and practically given the difficulty of primary school children travelling up to 8 km from their homes to school). An aim to keep travel distances/times for primary school children needs to be stated.</p> <p>[Originally submitted in response to CF1]</p>	Comment noted. The required locations of new schools have been informed by Newham's pupil study, Places for All (2022), which considers travel distances for primary school pupils.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/007	Community Facilities	CF4 Education and childcare facilities			2			<p>[Add to it] Demand from the high density new housing developments are stated as 'The size and establishment of the primary school provision will be dependent upon the number of homes delivered and the residential housing mix to ensure school places are brought on in line with the growth from housing.' p17. A 2FE primary school is proposed as meeting the demand from the Silvertown Quays development but this seems a very low provision given phase 1 alone will generate over 1000 new homes and the current planning permission under review from Dec 2022 is doubling the housing density across the whole site.</p>	Comment noted. The pupil study is updated every year and includes consideration of changing housing projections as well as changing trends in pupil enrolment. To reflect the need to remain responsive, policy S14 requires developers to engage with the council's education department at the point of delivery to ensure the right size school is delivered. The need for schools to be flexibly designed to meet changing demand is also outlined in S14.

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										[Originally submitted in response to CF1]	
Reg18-T-009	Britannia Education Trust	Reg18-T-009/008	Community Facilities	CF4 Education and childcare facilities			2			[Add to it] Phase 1 of Silvertown Quays provides no additional school places and there are no plans to expand existing facilities of the area to meet this phase 1 demand. There should be mention how demand is to be met via such measures as temporary accommodation provided prior to phased delivery of new permanent school facilities  [Originally submitted in response to CF1]	Comment noted. The pupil study is updated every year and includes consideration of changing housing projections as well as changing trends in pupil enrolment. To reflect the need to remain responsive, policy S14 requires developers to engage with the council's education department at the point of delivery to ensure the right size school is delivered. The need for schools to be flexibly designed to meet changing demand is also outlined in S14.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/009	Community Facilities	CF4 Education and childcare facilities			2			[Add to it] The pupil yield modelling used for new high density development is questionable given that Royal Wharf Primary School is oversubscribed by 100% and the only other primary school in the neighbourhood is similarly oversubscribed.  [Originally submitted in response to CF1]	Comment noted. The pupil study is updated every year and includes consideration of changing housing projections as well as changing trends in pupil enrolment. To reflect the need to remain responsive, policy S14 requires developers to engage with the council's education department at the point of delivery to ensure the right size school is delivered. The

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											need for schools to be flexibly designed to meet changing demand is also outlined in S14.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/010	Community Facilities	CF4 Education and childcare facilities			2		<p>[Add to it] Securing long-term options to deliver education facilities through SSAs needs some metrics defined for such facilities so this obligation/burden placed in development sites is known in detail to the site purchasers/owners. Since such planning obligations are the primary way that new social infrastructure is delivered, it is important that it is fully factored into the assumed land value being established by the market before any change in use/planning consent is negotiated. If the assumption is just for minimum compliant DfE school sizes and shared use/multiple colocation of other social infrastructure (currently unquantified by LBN guidance/requirements) in specific site allocations, then the development land prices will rise accordingly and develop expectation of reasonable minimum development obligations will be the built into their viability model.</p> <p>[Originally submitted in response to CF1]</p>	Comment noted. The sites required to deliver schools are identified in BFN1, S14 and the site allocations.	



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Reg18-T-009	Britannia Education Trust	Reg18-T-009/011	Community Facilities	CF4 Education and childcare facilities			2			<p>[Add to it] Flexibility of design to allow facilities to grow to meet increasing demand (and reduction as roles fall) seems essential but there is no guidance on how to interpret this when it comes to strategic site allocations. The DfE have reduced space standards for outdoor play areas to reduce delivery costs, meaning that historic opportunities for expansion using this space are not possible on most new school sites. LocateED at the DfE recommend strategic site allocations include additional area over the minimum DfE guidance that will allow colocated facilities. Additional site area could serve community need such as playing fields/sports facilities as part of an overall social social infrastructure strategy.</p> <p>[Originally submitted in response to CF1]</p> <p>[Note rest of the comments in response to CF1 captured under below hyperlinked document - see T-009/012].</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the design requirements of individual school sites will need to be assessed at the point of application.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/013	Community Facilities	CF4 Education and childcare facilities			2			<p>Plan Reference page 137</p> <p>CF4</p> <p>7. Schools and higher education facilities should be designed and managed to meet a variety of community uses by:</p> <ul style="list-style-type: none"> <li>a. providing access for community uses outside of core hours;</li> <li>b. ensuring that the design of new education facilities is flexible in order to allow for a variety of uses within them.</li> </ul> <p>Comment</p> <p>This aim is laudable but there is no real guidance on how this is to be achieved. Sharing facilities is promoted by the DfE but this will inevitably require additional space and funding beyond DfE standards for schools design to be viable.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the need for schools to be available to use by the wider community is an established approach and adheres to the adopted London Plan Policy S3.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/014	Community Facilities	CF4 Education and childcare facilities			7			The logical way this could be tackled is for strategic site allocations to define required site areas over and above minimums set by the DfE that inherently only cover single use provision.	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for education space has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/015	Community Facilities	CF4 Education and			7			Another detail that is missing is that of coordinated social infrastructure assessment that might place education facility provision within their inherent context of a	Unfortunately it was not clear what change you wanted to make to this part of the Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
				childcare facilities						neighbourhood level network of provision/facilities.	
Reg18-T-009	Britannia Education Trust	Reg18-T-009/016	Community Facilities	CF4 Education and childcare facilities			7			LBNs CF2: New and re-provided community facilities and the Community Facilities Community facilities Needs Assessment appears not to be strongly linked to CF4: Education and Childcare Facilities and the GLA's Shaping Neighbourhoods Portfolio of SPGs is not referenced despite the recognised need by LBN to plan in terms of this neighbourhood scale within the Local Plan.	Comment noted. Those SPGs are associated with a London Plan which has been replaced. They are no longer part of London's Development Plan.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/017	Community Facilities	CF4 Education and childcare facilities			7			The consequence of the lack of detail in what a strategic site allocations means in practice for education facilities and associated social infrastructure means the associated development obligations are wholly up to site by site planning negotiation based on developer interpretation of the limited metrics/precedents available. This lack of articulation of what good neighbourhood level social infrastructure 'looks like' weakens the hand of the local authority in setting reasonable development obligations.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). Please see the new wording in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements for social infrastructure. This policy approach seeks to strike the right balance to ensure applicants are clear on what is required but retain sufficient flexibility so that the right type of facilities can be brought forward at the point in time the application is made and delivered.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/018	Community Facilities	CF4 Education and childcare facilities			7			It also has the effect of undervaluing social infrastructure investment in the context of more clearly articulated demands such as affordable/social housing and open space provision.	This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). Please see the new wording in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements

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											for social infrastructure. This policy approach seeks to strike the right balance to ensure applicants are clear on what is required but retain sufficient flexibility so that the right type of facilities can be brought forward at the point in time the application is made and delivered.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/019	Community Facilities	CF4 Education and childcare facilities			7			Missing also here is that community access to education facilities has an operating cost in addition to capital cost if the facility design does not allow independent community access, separate toilets and security system for the main education facility. If such added operational costs are not avoided via a planning requirement it may prove unaffordable to use such shared facilities. This is another reason to have defined specifications for site specific allocations.	Comment noted. This is not something which can be addressed in detail in the Local Plan but would form part of the pre-application discussions with the Council on sites deliver education uses.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/020	Community Facilities	CF4 Education and childcare facilities			7	3.110	<p>Plan Reference page 137</p> <p>Justification</p> <p>3.110 Beyond addressing the statutory requirement of Local Authorities to provide sufficient places, this policy also speaks to the importance of educational facilities as sites that promote community cohesion.</p> <p>Comment</p> <p>There are no supporting metrics or guidance that would allow strategic site allocations to quantify and make space allowances for such 'coe' hubs that combine schools with other community facilities. Implementation of this policy is then left wholly open to vararies of site by site interpretation and negotiation rather than working from a defined site site allocation set of integrated social infrastructure requirements. Advice from the Royal Docks Team is that it is left to the developers to assess local social needs and make proposals in compliance with the Local Plan.</p>	<p>This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). Please see the new wording in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements for social infrastructure.</p>	

Reg18-T-009	Britannia Education Trust	Reg18-T-009/021	Community Facilities	CF4 Education and childcare facilities				3.110		Reference is made to the Community Facilities Needs Assessment, 2022, but this is largely an assessment of current provision with very little by way of methods or metrics to calculate what should be provided at a neighbourhood or site level	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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Reg18-T-009	Britannia Education Trust	Reg18-T-009/022	Community Facilities	CF4 Education and childcare facilities				3.110		<p>[Reference is made to the Community Facilities Needs Assessment, 2022, but this is largely an assessment of current provision with very little by way of methods or metrics to calculate what should be provided at a neighbourhood or site level.]critically, schools are not covered by this assessment and this poses an issue when the colocation of community facilities news to be considered in setting strategic site allocations.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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Reg18-T-009	Britannia Education Trust	Reg18-T-009/023	Community Facilities	CF4 Education and childcare facilities						<p>Plan Reference page 137</p> <p>CF4.1 New education facilities outside of those planned in site allocations will be considered as long as need for them is demonstrated. Applicants will have to submit evidence of need, including the number of potential pupils and evidence that there are not sufficient education spaces to meet demand.</p> <p>Comment It is not clear who the 'applicants' might be or when and who to speak to regarding this policy clause.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as an applicant would be someone bringing forward a site for a new school. The use of the term applicant has been used consistently through the Local Plan. The next line in the implementation text states that 'Applicants should engage in early Pre-Application discussions with the Education Place Planning team'.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/024	Community Facilities	CF4 Education and childcare facilities			1			<p>Phase 1 Silvertown Quays is proceeding with no education facilities provided. Surely it is LBN's responsibility to identify proactively the need for additional school places outside site allocation and make the case for ensuring their supply.</p>	Comment noted. The Places for All Strategy (2022) and our work with Newham's Education department have informed our approach to education requirements in the Local Plan site allocations. In response to this evidence of need, the Regulation 19 approach remains the same in respect of the sites being allocated for primary, secondary and SEND education. The need for SEND provision is evidenced in the Places for All Strategy (2022) and a separate SEND Strategy (2023) which was adopted by the Council in October 2023. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.

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Reg18-T-009	Britannia Education Trust	Reg18-T-009/025	Community Facilities	CF4 Education and childcare facilities			1			Both local primary schools are already heavily oversubscribed.	Comment noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/026	Community Facilities	CF4 Education and childcare facilities			1			There is a need to see policy covering education facilities on a neighbourhood level that would require planning obligations to optimise existing facilities at that scale of planning rather than simply building new facilities in isolation that perpetuate disparities and do not aid community cohesion.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 only requires new education facilities where our evidence supports the need for new facilities (Newham's Places for All Strategy (2022) and Newham's SEND Strategy (2024)). We also work closely with our Education colleagues who have informed our approach to education allocations. We have added a wording change to the policy to make it clear we only seek new education facilities of the scale required to meet the projected need for school places.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/027	Community Facilities	CF4 Education and childcare facilities			1			Current use of CIL does not require LBN to use such gains to deal with existing local social infrastructure deficiencies. Silvertown Quays is said to raise £60m in CIL and yet the Local Plan policy appears to overlook the need to address the need for investment across a neighbourhood and not just within the development site area	The expenditure of CIL is informed by the Council's Infrastructure Delivery Plan and Capital Programme, both of which consider the growth occurring in the borough and where new infrastructure is required to meet that growth.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/028	Community Facilities	CF4 Education and childcare facilities			1			<p>Plan Reference page 137</p> <p>CF4.5 In terms of layout, new education facilities need to provide outdoor greenspace at ground-floor level (including play spaces, allotments, gardens, trees, sheltered outdoor spaces, and food growing spaces) in line with Sport England's Planning for Sport Guidance (2019).</p> <p>Comment</p> <p>This policy appears to have no defined metrics as to what is a suitable provision. The Sport England Guidance appears to be focussed on principles and there is no obvious way of assessing compliance.</p>	<p>Comment noted. The Local Plan takes a proactive approach to the protection of green space and seeks the provision of green space in new education facilities and recommends locating new schools in proximity to publicly accessible open space (Policy SI4). The amount of onsite green space provision for new education facilities will be context sensitive. As such, it is not appropriate to specify a defined amount of green space which is applicable for all new education uses. The Green and Water Strategy (2024) has undertaken a comprehensive assessment of Newham's green space. This, and the accompanying Action Plan, will be used at pre-application to ensure all new schools are maximising the provision of outdoor learning space.</p>
Reg18-T-009	Britannia Education Trust	Reg18-T-009/029	Community Facilities	CF4 Education and childcare facilities			5			<p>There appears to be information on spatial requirements for allotments, gardens and food growing spaces. The recently completed Royal Wharf Primary School is maybe a good example of such policy aims not realising such facilities in practice.</p>	<p>Comment noted. The Local Plan takes a proactive approach to the protection of green space and seeks the provision of green space in new education facilities and recommends locating new schools in proximity to publicly accessible open space (Policy SI4).</p>
Reg18-T-009	Britannia Education Trust	Reg18-T-009/030	Community Facilities	CF4 Education and childcare facilities			5			<p>BB103 provides guidance on max and min outdoor greenspace area, but the range is big and there is a risk that minimum greenspace provision is made, compromising the functionality of such a provision.</p>	<p>Comment noted. The Local Plan takes a proactive approach to the protection of green space and seeks the provision of green space in new education facilities and recommends locating new schools in proximity to publicly accessible open space (Policy SI4).</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/031	Community Facilities	CF4 Education and childcare facilities			5			Current development trends are quite different to those of circa 20 years ago, with very high densities, low garden provision and minimal outdoor play space for general use. This places an importance on the access to green spaces within education facilities as community resources in addition to specific school use.	Comment noted. We agree with this assertion, which is why the Local Plan takes a proactive approach to the protection of green space and seeks the provision of green space in new education facilities and recommends locating new schools in proximity to publicly accessible open space (Policy SI4).
Reg18-T-009	Britannia Education Trust	Reg18-T-009/032	Community Facilities	CF4 Education and childcare facilities			5		<p>Plan Reference page 137</p> <p>New education facilities need to provide access for community uses outside of core hours, which include before and after school hours, half terms, and summer holidays. All spaces within educational facilities, including classrooms, halls, gyms, outdoor spaces, and canteens, should be available for local community groups and the Council. In order to guarantee access to the community, a Community Use Agreement will be secured that will prioritise community uses at affordable rates.</p> <p>Comment</p> <p>This sounds good in theory but what is the mechanism to make this a requirement placed as an obligation on developer's planning permission? Notional community access rights are meaningless unless the design of the facilities can accommodate such shared use in both layout and the</p>	This policy approach has now changed to ensure the ambition of securing shared use of education spaces is deliverable. Policy SI4 now includes the requirement for applications where these is shared use of education facilities to enter into a Community Use Agreement, secured through a legal agreement, with the Council .	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		operational model the school uses is suitable.									
	Comment noted.	Community use of education facilities may be double counting already committed single use space such as most school class rooms, toilets etc.		7			CF4 Education and childcare facilities	Community Facilities	Reg18-T-009/033	Britannia Education Trust	Reg18-T-009

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-009	Britannia Education Trust	Reg18-T-009/034	Community Facilities	CF4 Education and childcare facilities			7			Where there is a planned shared use of school accommodation it has to be viable in terms of the inherent additional costs such use will incur either to the school or the community users. Affordability is a big issue raised by the CFNA and promotion of shared use education facilities in the Local Plan needs backing up with real models of how this will work in practice.	Comment noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/035	Community Facilities	CF4 Education and childcare facilities			7			There is a danger that assumed shared use is a pretext to reduce site allocation for separate community infrastructure.	Comment noted. This is not the intention of Policy SI4, which is to ensure we make the best use of our buildings and social infrastructure in Newham. This is a recognised approach to resource allocation and one supported in both the NPPF and the London Plan.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/036	Community Facilities	CF4 Education and childcare facilities			7			Dedicated shared space in education facilities has been provided at locations such as Drew Primary School but this is a discrete building with its own entrance and security arrangements.	Comment noted.
Reg18-T-009	Britannia Education Trust	Reg18-T-009/037	Community Facilities	CF4 Education and childcare facilities			7			New education facilities will require a detailed agreement on how shared use of such facilities by the community will work in practice before planning assumptions can be made and agreed by developers.	This policy approach has now changed to ensure the ambition of securing shared use of education spaces is deliverable. Policy SI4 now includes the requirement for applications where there is shared use of education facilities to enter into a Community Use Agreement, secured through a legal agreement, with the Council .
Reg18-T-041	Community Group Representative	Reg18-T-041/007	Community Facilities	CF4 Education and childcare facilities			7			[Keep it]	Support noted.

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Reg18-E-053	Department for Education	Reg18-E-053/002	Community Facilities	CF4 Education and childcare facilities						4. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 95).	Comment noted. The Places for All Strategy (2022) and our work with Newham's Education department have informed our approach to education requirements in the Local Plan site allocations. In response to this evidence of need, the Regulation 19 approach remains the same in respect of the sites being allocated for primary, secondary and SEND education. The need for SEND provision is evidenced in the Places for All Strategy (2022) and a separate SEND Strategy (2023) which was adopted by the Council in October 2023. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.
Reg18-E-053	Department for Education	Reg18-E-053/003	Community Facilities	CF4 Education and childcare facilities						The department supports the principle of Newham safeguarding land through site allocations for the provision of new schools to meet government planning policy objectives as set out in paragraph 95 of the NPPF.	Support noted.
Reg18-E-053	Department for Education	Reg18-E-053/004	Community Facilities	CF4 Education and childcare facilities						When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education. <sup>1</sup> <a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>	Comment noted. Policy SI4 already makes provision for the need for a flexible design to allow for future growth. This is further expanded in the implementation text (SI4.3). The evidence base links for this policy already make reference to the DfE guidance.



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Reg18-E-053	Department for Education	Reg18-E-053/005	Community Facilities	CF4 Education and childcare facilities						Newham should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development <sup>2</sup> (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system. <sup>2</sup> <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>	Comment noted.
Reg18-E-053	Department for Education	Reg18-E-053/006	Community Facilities	CF4 Education and childcare facilities						In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27) <sup>3</sup> , DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the department to your list of relevant organisations with which you engage in preparation of the plan. <sup>3</sup> NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers.	Comment noted. The DfE is consulted on all stage of the Local Plan process as part of Newham's list of Statutory Consultees.

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Reg18-E-053	Department for Education	Reg18-E-053/007	Community Facilities	CF4 Education and childcare facilities						New schools may be delivered by local authorities or by the department under the Free Schools Programme. Under the 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. When the department delivers the school, the local authority is less involved but may provide support, including a site. Either route can deliver schools on land that has been provided as a developer contribution. The department has published further general information on opening free schools, as in the footnote below. <sup>4</sup> <a href="https://www.gov.uk/government/collections/opening-a-free-school">https://www.gov.uk/government/collections/opening-a-free-school</a>	Comment noted.
Reg18-E-053	Department for Education	Reg18-E-053/008	Community Facilities	CF4 Education and childcare facilities						The department welcomes reference within the plan to support education provision as set out in Policy CF4: Education and childcare facilities.	Support noted.

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Reg18-E-053	Department for Education	Reg18-E-053/009	Community Facilities	CF4 Education and childcare facilities						<p>However, the current wording of Policy CF4.2 fails to provide the flexibility, where demand exists, to allow for education provision to be delivered on windfall sites.</p> <p>To enable this flexibility, we request the following addition (see inserted text in bold):  The delivery of new educational facilities to meet changing pupil place needs will be secured through:</p> <ul style="list-style-type: none"> <li>a. ensuring the education facility is delivered in the appropriate phase of development</li> <li>b. securing the long-term option to deliver an education facility on specified site allocations <b>or windfall sites</b>; and</li> <li>c. requiring a flexible design so the facility can grow incrementally as pupil numbers increase</li> </ul>	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4.1.c already considers the issue of windfall education sites.
Reg18-E-053	Department for Education	Reg18-E-053/010	Community Facilities	CF4 Education and childcare facilities						<p>Further, the justification for Policy CF4, at paragraphs 3.107 and 3.108 refers to the Local Authority 'duty to secure pupil places for all children of statutory school age of 0-25'. Whilst sufficient education and training provision for young people with an Education, Health and Care (EHC) plan should be made up to the age of 25, the duty applies otherwise only up to age 19. Please see paragraph 10 of DfE Developer contributions guidance which sets this out. Please therefore amend or clarify the reference in both paragraphs 3.107 and 3.108, as well as within the evidence base and/or other background documents which have informed this policy and justification.</p>	This wording change has been made. Please see the new wording at in the Justification text for Policy SI4 to correct the age and include information on early years and provision of special educational places.

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Reg18-E-053	Department for Education	Reg18-E-053/011	Community Facilities	CF4 Education and childcare facilities					CF4.1 Site allocations	We welcome the allocation of specific sites to deliver the education places needed to support growth Newham, based on the latest evidence of identified need and demand in the evidence base.	Support noted.
Reg18-E-053	Department for Education	Reg18-E-053/012	Community Facilities	CF4 Education and childcare facilities					CF4.1 Site allocations	The site allocations and associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. Establishing these requirements within the plan is particularly important for securing sites at an appropriate value when additional land or standalone sites for schools need to be purchased, as DfE 'Basic Need' funding allocations do not factor in the costs of site acquisition.	Comment noted. We have made a wording change to Policy S14 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.
Reg18-E-053	Department for Education	Reg18-E-053/014	Community Facilities	CF4 Education and childcare facilities					CF4.1 Site allocations	While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it.	Comment noted. We have made a wording change to Policy S14 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.

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Reg18-E-053	Department for Education	Reg18-E-053/015	Community Facilities	CF4 Education and childcare facilities					CF4.1 Site allocations	The department therefore recommends the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that	This policy approach has now changed to reflect that the specific requirements for developer contributions for education contributions will be confirmed at application stage. Please see the new wording in Policy SI4 and its implementation text.
Reg18-Ag-001	Green Street Assembly	Reg18-Ag-001/158	Community Facilities	CF4 Education and childcare facilities						Dear Newham Council, we would like to open a school for our community. Because it has high demand in Newham. But other schools don't have enough places for students. Also there are not enough community schools. We are working on it and need a building etc. You have plan for next 15 years where number of children will be there. They need proper and quality education system. We would like to serve our community with councils support. Today we would like to request. Please add this school's subject to your plan. Thanks One Ummah Org. This project will be helpful for our youth It helps them to work on right direction. Most parents want quality education which would help them. Have engaged with education but now need a site. Council might have sites they have offer. Lots of demand for this type of school - Islamic school - 1,000 in community. Most parents worried about crime Givem them the opportunity for the community to teach them.	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's Places for All Strategy (2022) and our work with Newham's Education department already identified the need for new schools and the best locations for them. This need has not changed since the publication of the Regulation 18 Local Plan. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.

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Reg18-E-082	Resident	Reg18-E-082/042	Community Facilities	CF4 Education and childcare facilities				3.11		<ul style="list-style-type: none"> <li>Page.138 (3.110). We welcome more effective use of educational sites for the community, however, there are issues around Use Class F (Local Community and Learning) and changes not requiring planning permission. Further, it is vital to note for example, clinics, health centres, creches, nurseries and day centres, which are commonly accepted community facilities in planning policy terms have moved from the former Class D1 Non-residential Institutions into Class E Commercial, Business and Service, as opposed to Class F Local Community and Learning. The rationale behind excluding these uses from Class F has never been made clear. Previously, many Local Plans required robust justification for the loss of these types of facilities and/or their replacement. <b>Class E now allows the change of use of clinics, health centres, nurseries, creches and day centres to other town centre uses (Class E) without the need for planning permission.</b> As a result, unless there are historic restrictive planning conditions or s106 covenants in place on a specific building (or indeed the building is listed), the changes to the Use Class Order will leave Newham with limited scope to protect existing facilities.</li> </ul>	Comment noted. It is true that the changes to the use class order have created greater flexibility and limited planning authorities' ability to protect uses from changes of use, which no longer require planning permission. We will seek to address this for new developments by adding restrictive conditions, where possible under regulations (see wording in Local Plan policies HS1 and HS2). In addition, while change of use may not require planning permission, redevelopment of buildings and spaces will do and can then be managed through the social infrastructure policies.

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Reg18-E-020	Resident	Reg18-E-020/001	Community Facilities	CF4 Education and childcare facilities						But please bring back inclusive education in all our school not intregation	Comment noted. The need for SEND provision is evidenced in the Places for All Strategy (2022) and Newham’s SEND Strategy (2023) which was adopted by the Council in October 2023. The Special Educational Needs and Disability (SEND) Strategy and the Outcomes Framework has been co-produced with key partners including children, young people, families, educational settings, multi-agency partners and Voluntary sector partners. At the heart of Newham’s SEND Strategy and Outcomes Framework are the core principles throughout of inclusion, equity, effectiveness and accountability. This is to ensure that children and young people with SEND and their families have a positive and welcoming experience whether they are at their local school learning alongside their peers or out enjoying all the borough has to offer.
Reg18-E-020	Resident	Reg18-E-020/002	Community Facilities	CF4 Education and childcare facilities						The local plan should include inclusive education for all our disabled children as Newham was known for this we are going backwards . This would help the world be more inclusive of disabled parent and disabled children .Are children and us mother not made to feel we are the problem .	Comment noted. The need for SEND provision is evidenced in the Places for All Strategy (2022) and Newham’s SEND Strategy (2023) which was adopted by the Council in October 2023. The Special Educational Needs and Disability (SEND) Strategy and the Outcomes Framework has been co-produced with key partners including children, young people, families, educational settings, multi-agency partners and Voluntary sector partners. At the heart of Newham’s SEND Strategy and Outcomes Framework are the core principles throughout of inclusion, equity, effectiveness and accountability. This is to ensure that children and young people with SEND and their families have a positive and welcoming experience whether they are at their

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											local school learning alongside their peers or out enjoying all the borough has to offer.
Reg18-T-108	Resident	Reg18-T-108/004	Community Facilities	CF4 Education and childcare facilities						[Keep it]	Support noted.
Reg18-T-126	Resident	Reg18-T-126/007	Community Facilities	CF4 Education and childcare facilities						[Keep it]	Support noted.
Reg18-T-018	Resident	Reg18-T-018/011	Community Facilities	CF4 Education and childcare facilities						[Add to it] Keep people with addictions away from parks	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy H5). The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less



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											attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan. However, The Local Plan cannot deliver the change you have requested. The Council's Community Safety department regularly collect and review data around ASB in the borough, responding to hotspot locations through targeted and focused operations in conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
Reg18-T-019	Resident	Reg18-T-019/008	Community Facilities	CF4 Education and childcare facilities						[Add to it] More transparency	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-038	Resident	Reg18-T-038/005	Community Facilities	CF4 Education and childcare facilities						[Add to it] Include more sports and outdoor activities for all.	Comment noted. The Regulation 18 leisure allocations were informed by the early modelling work for the Built Leisure Needs Assessment. This has been refined and finalised and has informed the latest requirements for leisure which are set out in the Local Plan's Site Allocations. Please see the Built Leisure Needs Assessment (2024) which is evidence to support our policy approach to the borough's leisure needs.
Reg18-T-048	Resident	Reg18-T-048/009	Community Facilities	CF4 Education and childcare facilities						[Change it] Children should have the benefit of fresh air and outside space.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 already makes provision for the need to ensure new, expanded or reconfigured education facilities have access to

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											outdoor green spaces and play spaces and to ideally be located within a 15-minute walking radius of a park. It also requires education spaces to maximise on site biodiversity, trees, gardens and food growing opportunities.
Reg18-T-048	Resident	Reg18-T-048/010	Community Facilities	CF4 Education and childcare facilities						[Change it] Local schools use the Park to teach PE and conduct classes outside when the weather permits. [Referring to WH Park]	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 already makes provision for the need to ensure new, expanded or reconfigured education facilities have access to outdoor green spaces and place spaces and to ideally be located within a 15-minute walking radius of a park. It also requires education spaces to maximise on site biodiversity, trees, gardens and food growing opportunities.
Reg18-T-057	Resident	Reg18-T-057/022	Community Facilities	CF4 Education and childcare facilities						[Add to it] X	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-072	Resident	Reg18-T-072/018	Community Facilities	CF4 Education and childcare facilities						[Add to it] All educational facilities should be open to all age groups inc older people over 60s who need to get out and learn new skills and meet people in safe community spaces.	Comment noted. Policy SI2, SI3 and SI4 all make provision for the need to ensure that social infrastructure facilities are open and welcoming to all.
Reg18-T-088	Resident	Reg18-T-088/006	Community Facilities	CF4 Education and childcare facilities						[Keep it] To respect all communities, should be girls and boys colleges are separate	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's Places for All Strategy (2022) and our work with Newham's Education department already identified the need for new schools and the best locations for them. This need has not changed since the publication of the Regulation 18 Local Plan.

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Reg18-T-102	Resident	Reg18-T-102/002	Community Facilities	CF4 Education and childcare facilities						[Keep it] SEN and facilities not satisfactory	Comment noted. The need for SEND provision is evidenced in the Places for All Strategy (2022) and Newham's SEND Strategy (2024) which was adopted by the Council in October 2024. The Special Educational Needs and Disability (SEND) Strategy and the Outcomes Framework has been co-produced with key partners including children, young people, families, educational settings, multi-agency partners and Voluntary sector partners. At the heart of Newham's SEND Strategy and Outcomes Framework are the core principles throughout of inclusion, equity, effectiveness and accountability. This is to ensure that children and young people with SEND and their families have a positive and welcoming experience whether they are at their local school learning alongside their peers or out enjoying all the borough has to offer.
Reg18-T-105	Resident	Reg18-T-105/011	Community Facilities	CF4 Education and childcare facilities						[Keep it]	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/029	Community Facilities	CF4 Education and childcare facilities						Sport England support CF4 7 which seeks schools and higher education facilities to be designed and managed to provide community access outside of core hours	Support noted.
Reg18-E-118	Sport England	Reg18-E-118/030	Community Facilities	CF4 Education and childcare facilities			7			[Sport England support] F4 8 which seeks new, expanded or reconfigured higher education facilities to deliver sufficient provision of leisure facilities to meet the needs of students.	Comment noted.

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Reg18-E-118	Sport England	Reg18-E-118/031	Community Facilities	CF4 Education and childcare facilities			8			Sport England recommends that this is expanded to 'students and community' as this would assist the Council in providing opportunities for communities to engage in sport and physical activity.	This policy approach has now changed to include reference to higher education facilities meeting the needs of the community. Please see the new word in Local Plan Policy S14.8.
Reg18-E-118	Sport England	Reg18-E-118/032	Community Facilities	CF4 Education and childcare facilities			8		CF4.1	CF4.1 indicates that school expansions will be considered providing playing pitches are protected. National and Sport England Policy protects playing fields which is more than just the playing pitches. Sport England, therefore, advises that the reference to playing pitches is amended to playing fields to ensure this is sound.	This wording change has been made. Please see S14.1 Implementation text.
Reg18-E-118	Sport England	Reg18-E-118/033	Community Facilities	CF4 Education and childcare facilities					CF4.2	Sport England notes the reference to Active Design in CF4.2 but this would be best placed elsewhere in the document as highlighted above [see Reg18-E-118/008]	Support noted for Policy S14. This wording change to the Design Chapter has been made. Please see the new wording in policy D1 Design Standards and D2 Public Realm Net Gain.

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Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/093	Community Facilities	CF4 Education and childcare facilities						<p>The Berkeley Group agrees and acknowledges that a sufficient supply of childcare facilities, primary schools, secondary schools and Special Educational Needs and Disabilities (SEND) schools is needed to meet local need. Part a) of Policy CF4 notes that this will be achieved by the delivery of new schools and childcare facilities on identified site allocations. Providing such facilities should be based on an up to date needs assessment based on the form of development coming forward at that time to ensure that any provision is actually meeting a need rather than being provided for the sake of it. The Berkeley Group proposed amendments to draft policy wording: 1. A sufficient supply of childcare facilities, primary schools, secondary schools, and Special Educational Needs and Disabilities (SEND) schools to meet local need, will be achieved through:</p> <p>a. the delivery of new schools and childcare facilities on identified site allocations, subject to a needs base <u>assessment at the time of delivery</u>;</p>	<p>We have made a wording change to Policy S14 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered. The Places for All Strategy (2022) and our work with Newham’s Education department have informed our approach to education requirements in the Local Plan site allocations. In response to this evidence of need, the Regulation 19 approach remains the same in respect of the sites being allocated for primary, secondary and SEND education. The need for SEND provision is evidenced in the Places for All Strategy (2022) and a separate SEND Strategy (2023) which was adopted by the Council in October 2023. The Special Educational Needs and Disability (SEND) Strategy and the Outcomes Framework has been co-produced with key partners including children, young people, families, educational settings, multi-agency partners and Voluntary sector partners.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-032	West Silvertown Foundation	Reg18-E-032/003	Community Facilities	CF4 Education and childcare facilities			1.a			<p>The existing primary schools, Britannia Village Primary school and Royal Wharf primary school, have a 1st-choice waiting list of 90 local children just for reception. Children living more than 0.27 miles or a 4-minute walk from Royal Wharf primary school aren't able to get into the school and are having to go to schools 2 bus journeys away. This creates issues around community cohesion and Newham's 15-minute neighbourhood model.</p> <p>Whilst we recognise there are new schools planned for Connaught Riverside, Silvertown and Thameside West, there are still 2 potential issues:</p> <ul style="list-style-type: none"> <li>- The schools aren't proposed for the 1st phase of building, meaning new residents moving into the early phases won't be able to send their children to school locally, with a knock-on effect on place making for the whole community.</li> <li>- We are concerned that even with all the new schools open, there may not be enough spaces for all local children. Our experience with Royal Wharf has already proved that far more children moved onto the estate than anticipated, and we want to ensure this pattern isn't repeated.</li> </ul>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's Places for All Strategy (2022) and our work with Newham's Education department already identified the need for new schools and the best locations for them. This need has not changed since the publication of the Regulation 18 Local Plan. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-022	West Silvertown Foundation	Reg18-K-022/001	Community Facilities	CF4 Education and childcare facilities						"Primary schools in the South-West of the Royal Docks (West Silvertown area) are already oversubscribed - with a waiting list of 90 local children for the 2 existing primary schools (Britannia Village Primary school and Royal Wharf Primary school). Currently people living 0.27 miles or more from Royal Wharf Primary school can't get in to the school, as there are so many families moving into the area. It is encouraging to see 3 new schools are planned, but these will need to be a significant size to educate all the local children. It also creates a meanwhile issue - these schools aren't planned for phase 1 of developments so where will the first residents go to school? West Silvertown Foundation and Britannia Education Trust are embedded in the local community and are prepared to think of creative ways to address this issue, but will need support from Newham council in doing this. [originally submitted in response to clause 5 of BNF1 Spatial Strategy]	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's Places for All Strategy (2022) and our work with Newham's Education department already identified the need for new schools and the best locations for them. This need has not changed since the publication of the Regulation 18 Local Plan. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.
Reg18-K-022	West Silvertown Foundation	Reg18-K-022/003	Community Facilities	CF4 Education and childcare facilities						The proposed schools in Thameside West, Silvertown and Connaught Riverside are not coming in early enough phases. The existing primary schools already have a 90 place 1st choice local waiting list for reception, and children that live 0.27 miles or more from Royal Wharf Primary school can't get into the school. We need to bring forward plans to open new schools, or expand existing primary schools in the short term so that new residents can attend a school within the	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's Places for All Strategy (2022) and our work with Newham's Education department already identified the need for new schools and the best locations for them. This need has not changed since the publication of the Regulation 18 Local Plan. We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required, to undertake an assessment

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										15 minute neighbourhood model. Britannia Education Trust and West Silvertown Foundation are able to offer creative solutions which we can implement much sooner than the proposed new schools.[note comment submitted x3 time on Konveio on same policy clause, same person]	at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered.
Reg18-T-103	Resident	Reg18-T-103/018a	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			2. The delivery of new educational facilities to meet			[Change it] Community spaces [and homes] are being bought up by wealthy foreign investors	Comment noted. Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, business and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											requires that all significant developments are masterplanned alongside the existing community - so that the community are central to shaping the borough as it changes.
Reg18-T-072	Resident	Reg18-T-072/027	Waste and Utilities	W1 Waste management capacity						[Add to it] Clean WCs public use needed in parks and shopping malls. [Originally submitted in response to W1]	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy SI2.6(k) already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2.
Reg18-E-070	Aston Mansfield	Reg18-E-070/064	Community Facilities							0.4. COMMUNITY FACILITIES No comment	Unfortunately it was not clear what addition you wanted to make to this part of the Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/175	Community Facilities							P.121 General ideas on Community facilities: Could all community centres (and maybe some libraries) provide spaces where local people can bring unwanted items, to donate to others, swap or bring items to share, as part of increasing the lifespan and use of items, alongside reducing the frequency by which new items are manufactured and bought?	A change to this policy approach has been made to encourage and facilitate the Circular Economy. The implementation text to Policy SI2.7 now encourages the provision of include the following services: <ul style="list-style-type: none"> <li>· repair/refurbishment workshops;</li> <li>· other uses associated with repair of products e.g. tailors;</li> <li>· shops selling second hand goods;</li> <li>· lending libraries (e.g. 'Library of things');</li> <li>· hire shops; and</li> <li>· 'reuse hubs'.</li> </ul>
Reg18-E-133	Climate You Change	Reg18-E-133/176	Community Facilities				p.121			Could Newham's Local Plan also include mention of introducing community fridges and drinking water fountains in all of our high streets and suitable public spaces (i.e. community centres, libraries, markets, malls and leisure centres for community fridges, plus parks etc for the drinking water fountains)? These could be highly publicised to increase uptake.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 already requires new and re-provided community facilities to be of a high design quality and to meet the needs of the existing or intended users. The implementation for Policy SI2 provides further guidance on what this could mean, including provision of kitchen and food storage spaces.

Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/011	Community Facilities							<p>However, the Community Facilities Needs Assessment cannot be considered definitive in its findings. It does not consider the many Charity run community facilities provided by religious groups such as the River Christian Centre.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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												<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/023	Community Facilities							<p>Leisure, Culture and Sporting Venues</p> <p>The draft Local Plan is missing a policy that supports the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley Velo Park and Three Mills Island and the role they can play in growing the visitor economy. Sport and leisure activities have an important role to play in creating a sense of place and improving health and well-being. As previously stated the Authority regularly reviews the future of the outdoor sporting provision at the VeloPark and its programme of events to identify where improvements are required. Policy that supports the evolution of the venue to meet changes in cycle sports and competition events in the coming years should be incorporated into the Plan.</p>	<p>This wording change has been made. Please see new paragraph in the Justification text to Policy SI3 Justification to clarify policy intent and to add Newham specific detail regarding the Lee Valley Regional Park.</p>

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Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/024	Community Facilities							<p>The current LLDC Local Plan includes a statement (set out within Sub Area 2 North Stratford and Eton Manor) supporting the Lee Valley Velopark and the work of the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability. The LLDC Local Plan recognises the world class status of the sports facilities at the VeloPark and its importance as a national leisure and sporting venue hosting local, national and international events, together with its role in delivering a sporting legacy for local communities.</p> <p>A similar level of policy support should be incorporated into Newham's Local Plan to enable the Authority to continue to improve and grow the sporting offer at the VeloPark both as an international/national leisure and sporting venue and as a sporting venue for the local community. Regional/national venues such as the Lee Valley VeloPark bring wider social and economic benefits to the Borough that need to be supported and promoted through the Local Plan.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the growth and diversification of the Lee Valley Velo Park and Three Mills Island would be addressed through Local Plan policies SI1, SI2 and SI3.</p> <p>New or cultural and leisure facilities would be supported, where they are in line with Policy SI2.</p> <p>Policy SI3, in particular, is intended to protect and support the growth and diversification of cultural and leisure facilities. A wording change to Policy SI3 Justification text now clarifies policy intent and adds Newham Specific detail on the Queen Elizabeth Olympic Park, associated leisure facilities and the reference is made to the Lee Valley Regional Park Authority.</p>
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/090	Community Facilities							Facilities for older people	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											the protection and delivery of facilities which older people may use.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/011	Community Facilities							<p>Burials</p> <p>Our main unresolved concern is the proposal to delegate burial policy upwards to the London Plan. We consider this to be inadequate, on the basis that we believe that there is significant unmet need within Newham for burial spaces, specifically as for some faith groups, burials cannot be accommodated within the reuse of existing graves.</p> <p>Burial space is at a premium in east London, resulting in capacity within Redbridge being used earlier than anticipated, and we would like to gain a better understanding of the overall demography across the subregion to anticipate future needs. We would welcome further discussion with appropriate colleagues at Newham on this topic.</p>	A change to this policy approach has been made to address burial space in the Local Plan, please see Policy SI5: Burial Space. Newham is actively working on its approach to addressing need for burial space, including discussions with Redbridge and other neighbouring boroughs.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/011	Community Facilities							<p>Community Facilities</p> <p>CF1 - CF4</p> <p>We are supportive of the policies in this chapter, as they provide a robust and justified approach to community facilities by seeking to protect, provide and re-provide community facilities in the borough. This approach is clearly linked to the principles set out in the 50 Steps and advocates the child-friendly approach as set out in the GLA's Making London Child Friendly Report (2021).</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-089	Newham New Deal Partnership	Reg18-E-089/007	General							With respect to One Newham concerns, I note that the voluntary, community and faith sector - who will need to serve the needs of a growing number of residents during the period of the plan, especially residents living in 'affordable' accommodation - is only word checked twelve times in the entire document (faith = 6; voluntary = 3, charity = 3).	Comment noted. The term community facility used in the Local Plan encompasses places of worship and many of the facilities run by the voluntary and charity sector. The rationale for improving the protection of these spaces and flexibility of where they can be located is based on our understanding of their importance to residents.
Reg18-E-089	Newham New Deal Partnership	Reg18-E-089/008	Community Facilities							With regard to the concerns in the earlier One Newham submission, I note: 1. There is no increase in community facilities in the local plan, despite the significant population increase, only 'protecting' existing facilities, so residents will be significantly less well served;	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-E-089	Newham New Deal Partnership	Reg18-E-089/010	Community Facilities							3. The plan is silent on the identified need for a Centre for Independent Living.	The Local Plan addresses this topic through the policies in the Social Infrastructure Chapter. However, it cannot deliver the change you have requested. While we don't provide a dedicated Centre for Independent Living in the borough, our colleagues in Access and Customer Service Centre departments are able to help with similar queries you may direct to a Centre for Independent Living. We have also provided our



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											colleagues in Newham's Adults Social Care Directorate with your comments.
Reg18-E-089	Newham New Deal Partnership	Reg18-E-089/002.b	Community Facilities						1.Newham NDP is disappointed, given high rates of disability in Newham and a growing older population over the plan period, that there are no figures or ratio guidance for the provision of [blue badges or] public toilets in the plan, or an identifiable process for targets for these to be included in each of the local neighbourhoods.	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the policy clauses to be necessary as Policy S12 already requires the provision of free, publically available toilets. This requirement was further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for Local Plan Policy S12.	

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Reg18-E-149	NHS North East London	Reg18-E-149/001	Community Facilities							We are a new organisation, as of 1st July 2022, and as such we are reviewing all legacy Clinical Commissioning Group strategies and plans with a view to publishing a NEL Infrastructure Strategy in early 2024. Given the recent formation of NEL ICB (1st July 2022), we are reviewing the early engagement of the Newham Local Plan a fresh from a NEL Integrated Care System perspective. We are reviewing the Local Plan against the following areas: 1. Health and integrated care policy & priorities 2. Urban planning interventions to improve the health and wellbeing of residents, 3. Planning system - space & capital	Comment noted.
Reg18-E-149	NHS North East London	Reg18-E-149/002	Community Facilities							A newly established Newham Local Infrastructure Forum will coordinate the development and delivery of health and care infrastructure requirements going forward. The Forum has a particular focus on ensuring sufficient physical capacity is available in the borough to meet the health needs of the current Newham population and the population as it grows. This includes Newham University Hospital which cares for one of the most diverse populations in England.	Comment noted.
Reg18-E-001	One Newham	Reg18-E-001/002	Community Facilities							Firstly, our members still raise as a top priority the lack of low cost but good quality community space available for rent or lease from Newham Council.	This policy approach has now changed to provide better guidance on what we consider an affordable and good quality community space to be. Please see the implementation text for Local Plan Policy S11. In addition, Policy S12 requires proposals for all new and re-provided (including

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premises for its intended users.
Reg18-E-001	One Newham	Reg18-E-001/003	Community Facilities							Many of our members are aware of the great quality buildings made available to the voluntary sector by neighbouring councils, such as Tower Hamlets who have refurbished the victorian townhall and library buildings and similar facilities across the borough and made these available and low cost to community groups.	Comment noted.
Reg18-E-001	One Newham	Reg18-E-001/004	Community Facilities							Many groups are put off using or renting LBN space (such as library meeting rooms) because of the very high cost.	This policy approach has now changed to provide better guidance on what we consider an affordable and good quality community space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premises for its intended users. We will pass this feedback regarding the affordability of LBN meeting rooms on to Newham's Resident Engagement and Participation team since this is not something the Local Plan can address.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-001	One Newham	Reg18-E-001/005	Community Facilities							Others are forced to run vital services for vulnerable members of our community (such as homeless and rough sleeper services) from cold and damp garages without any facilities.	Comment noted.
Reg18-E-001	One Newham	Reg18-E-001/006	Community Facilities							Our members are therefore still prioritising that the Council needs to develop a strong policy in relation to refurbishing or creating spaces for use by community groups but at a much better value, which reflects and acknowledges that a)the council is often not funding the activities but b) the community is significantly benefiting from the activities provided.	This policy approach has now changed to provide better guidance on what we consider an affordable and good quality community space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premises for its intended users. We will pass this feedback regarding the affordability of LBN community space on to Newham's Resident Engagement and Participation team since this is not something the Local Plan can address.
Reg18-E-001	One Newham	Reg18-E-001/008	Community Facilities							Our members also wanted to highlight the importance of the widespread availability of public toilets for both people with a disability and for elderly residents for whom this is of great importance in them being able to remain mobile and independent.	Comment noted. Policy SI2 already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for SI2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-Ap-001	Plaistow Assembly	Reg18-Ap-001/116	Community Facilities							[Add] Safe spaces - they are doing this in Tower Hamlets	A change to this policy approach has not been made. We did not consider this change to be necessary as the creation of safe spaces is addressed in the design policies.
Reg18-E-018	Resident	Reg18-E-018/001	Community Facilities							<p>I was wondering if there are any plans or even a panel for SEN planning?</p> <p>I am a parent carer for 2 teenage young people and I have been making Newham aware for years that we need a 'base' for SEN families to access facilities, services, resources, a cafe as respite for families and even a play area next to any medical facilities that can also be set up - perhaps partner with CAMHS, Newham hospital and CDS.</p> <p>I would ideally like to meet the Mayor as raised type of project is mammoth however there is a model that can be seen and am happy to share.</p> <p>I look forward to your reply.</p>	The Local Plan addresses this topic through local plan policy SI4 which outlines the need for schools, including SEND schools and how we will deliver them and through local plan policy SI2 which would enable support facilities for SEND families to be built in appropriate locations. These policies were informed by Places for All Strategy (2022) and Newham's SEND Strategy (2023) which was adopted by the Council in October 2023. The Special Educational Needs and Disability (SEND) Strategy and the Outcomes Framework has been co-produced with key partners including children, young people, families, educational settings, multi-agency partners and Voluntary sector partners. However, the local plan cannot deliver the change you have requested. Our colleagues in the Education, Inclusion and Achievement department may be able to help. We have also provided them with your comments.
Reg18-E-082	Resident	Reg18-E-082/027	Community Facilities							Page.37. Note that in context of <b>contributions for healthcare, agreement must be sought from the local NHS ICB</b> as to which data sources must use to calculate GP practice list size and its application in calculating contributions. This is to ensure consistency of approach.	This policy approach has now changed due to the need to set out how health facilities will be delivered across the Plan period. Please see the new wording in Policy SI2 (formerly CF2). Where no facility is coming forward on a large site, any financial contributions would be considered at application stage and on an application specific basis and the financial contribution linked to a

<b>Comment Response</b>	specified health project where the health needs of that population would be met.
<b>Comment</b>	
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Reg18-E-104	Resident	Reg18-E-104/019	Community Facilities								<p>The planning system needs a unique approach in Newham in relation to the future of, and planning of, religious uses of community buildings, and new religious buildings.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>
Reg18-E-104	Resident	Reg18-E-104/020	Community Facilities							<p>A changing and dynamic population risks having sections of its communities marginalised in design terms and permitted uses of buildings if the Local</p>	<p>This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. The Local</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Plan does not keep up with need around religious communities	Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (SI1) and supporting new social infrastructure (SI2, SI3 and SI4).
Reg18-E-104	Resident	Reg18-E-104/021	Community Facilities							Many groups are resigned to using buildings that are not purpose-built and working with a planning system that is too restrictive in terms of new venues and modern religious design in potential locations. The current permissions indicate a hierarchy of religious observance which is unconscionable.	Comment noted. Policies in the Social Infrastructure chapter have been drafted to allow the right facility in the right place. We have sought to provide a clear and fair approach to the location of social infrastructure. Indeed, since Regulation 18 this policy approach has now changed to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. The Local Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (SI1) and supporting new social infrastructure (SI2, SI3 and SI4).
Reg18-E-104	Resident	Reg18-E-104/022	Community Facilities							The new local Plan should, impliedly perhaps, regret the failure of the LLDC area to have any modern well-designed religious venues as part of the Olympic legacy in a Borough with the demographics of Newham.	This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. The Local Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (SI1) and supporting new social infrastructure (SI2, SI3 and SI4).
Reg18-E-104	Resident	Reg18-E-104/023	Community Facilities							Suggest the writers of the 2019 publication <i>London Planning for a Just Society? Exploring How Local Planning Authorities Are Embedding Equality and Inclusion in Planning Policy</i> are invited to discuss these issues with Newham Councillors and officers further.	Comment noted. We welcome the direction provided to this study to add to our understanding in this area. In June 2021 the TCPA provided the whole planning department with a training session on this document, which was a valuable resource and aided the development of policies in this Plan.

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Reg18-E-104	Resident	Reg18-E-104/026	Community Facilities							<p>In a significant tightening of policy, the new London Plan's policy S6 is clear and robust on large-scale developments and need for accessible public toilet provision:</p> <p>Large-scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of:</p> <p>1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and</p> <p>2) free 'Changing Places' toilets designed in accordance with the guidance in British Standard BS8300-2:2018. These should be available during opening hours, or 24 hours a day where accessed from areas of public realm.</p>	<p>This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy S12 already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for S12.</p>
Reg18-E-104	Resident	Reg18-E-104/027	Community Facilities							<p>[public toilets] Further the London Plan states in addition to policy S6 that "in smaller developments, and subject to local evidence and Development Plan policy, boroughs may secure access to toilet facilities as part of a community toilet scheme, or secure provision of public toilets through CIL or planning obligations."</p>	<p>This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy S12 already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for S12.</p>

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Reg18-E-104	Resident	Reg18-E-104/028	Community Facilities							[public toilets] The draft local plan makes a less ambition reference to this, simply stating that “we will expect major schemes with large numbers of visitors to provide public toilets,” with no policy in relation to smaller developments and no communication that the inclusive and robust London-wide policy has been noted.	A change to this policy approach has been made due to the need to better align to London Plan Policy S6 and provide clarity on the size of facility which is required to provide accessible toilets and baby change facilities. Please see the revised wording for Policy SI2.7 and its supporting implementation text.
Reg18-E-104	Resident	Reg18-E-104/029	Community Facilities							[public toilets] The role of the London Plan in transforming London on this point has particular relevance and opportunity in Newham, where so much of the development of London is expected to take place in forthcoming period. It is exactly the area to develop the London Plan advisory direction to develop local planning policy for public toilets around smaller developments.	Comment noted.
Reg18-E-104	Resident	Reg18-E-104/030	Community Facilities							[public toilets] [The Local Plan ] .. should also be robust in communicating its application of London Policy S6 in full.	A change to this policy approach has been made due to the need to better align to London Plan Policy S6 and provide clarity on the size of facility which is required to provide accessible toilets and baby change facilities. Please see the revised wording for Policy SI2.7 and its supporting implementation text.
Reg18-E-104	Resident	Reg18-E-104/031	Community Facilities							[public toilets] Newham could be a major player in arresting the deterioration of public toilet provision and its significant public health implications. Unfortunately, and despite the opportunity provided by the new London Plan, the draft local plan is found wanting on this point	A change to this policy approach has been made due to the need to better align to London Plan Policy S6 and provide clarity on the size of facility which is required to provide accessible toilets and baby change facilities. Please see the revised wording for Policy SI2.7 and its supporting implementation text.

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Reg18-E-104	Resident	Reg18-E-104/032	Community Facilities							[public toilets] The Local Plan should add to its evidence base the Royal Society for Public Health's 2019 publication " <i>The Decline of the Great British Public Toilet.</i> "	This wording change has been made. Please see new wording in the 'Evidence base links' for SI2 in the Community Facilities Chapter.

Reg18-E-139	Resident	Reg18-E-139/009	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	<p>General comment: This assessment needs a great deal of additional research and analysis to be a useful base document some of which is highlighted in section 8.1.3 p89.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Reg18-E-139	Resident	Reg18-E-139/010	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	The flaws in the analysis and reasoning negatively affect the higher level policy proposals SP1 and SP2. The following comments illustrate the deficits in the base document	Comment noted.

Reg18-E-139	Resident	Reg18-E-139/011	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	Methodology p8 Definition of 'community facilities' does not include Community health facilities such as access to primary care, day centres and supported residential homes so that older people can stay in the community.	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham's social infrastructure we have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough's existing community facilities and considers how the future growth of Newham's neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Reg18-E-139	Resident	Reg18-E-139/012	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	The definitions in the methodology do not categorise the capacity to deliver services such as: food banks, sheltering the homeless, cultural events, community learning, art/ cookery/ dance/ fitness, advice and counselling, mother and toddler, family gatherings, access to mental health services, bereavement services and palliative care. Some of these would be deemed 'Village Halls' which does have national guidance – not referred to in the policy and guidance review. This is highlighted in section 8.1.3 p89 and is essential to make valid recommendations. The baseline map p42 reinforces the notion that places of worship are only places of worship which is clearly not the case. The mapping does not show the multiple uses and functions of some sites. The consolidated baseline maps give equal value to a public toilet and a library or church which is misleading.	Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham's social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn't – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. Alongside the baseline mapping, the facilities audit recognises that

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										<p>many community facilities have a multifunctional role and this has informed the recommendations of the study and the policies.</p> <p>As well as the Community Facilities Needs Assessment, we have undertaken a number of studies to inform our policy approach. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>	
Reg18-E-139	Resident	Reg18-E-139/013	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	The assessment assumes public access at all times which is clearly not the case for the majority of facilities. This undermines the value of the baseline mapping on p44 – 46.	Comment noted. The Community Facilities Needs Assessment (2022) is the first such evidence base for Newham to provide any understanding of our landscape of community facilities. It could only provide a snapshot in time about the provision of the particular types of social infrastructure which the evidence base was designed to address (as set out above). The facilities audit does provide an assessment of frequency of use across different types of facilities to help inform the recommendations in

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											the report. The need for certain types of social infrastructure will naturally change over time. However it will provide a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.
Reg18-E-139	Resident	Reg18-E-139/014	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	A Typology of places of worship would help to map significant differences, needs and effect on social value and integration.	Comment noted. The Community Facilities Needs Assessment (2022) has sought to explore the provision of religious meeting places across the borough and is the first such evidence base for Newham to provide any understanding of our landscape of community facilities. The report has addressed the location of faith facilities to the depth required for this evidence base, which has considered a broad range of community facilities and not just those which are places of worship. The Assessment did consider typology of provision against where people, who have described themselves as having a particular religion, live. Please see page 52 of the report which sets out that in 2018, Newham's Muslim population made up 42.1% of its population but that there are 3 Churches for every Mosque or Masjid across the borough. It also found that there are neighbourhoods in East Ham where there are no places of worship for Muslims despite representing between 25 and 35% of the population in those areas. It has also demonstrated that there are very few places of worship, of any faith, in the south of the

<b>Comment Response</b>	borough. The mapping on page 42 has mapped the boroughs 206 places of worship by broad faith typologies (Buddhism, Christianity, Hinduism, Islam and Sikhism). The isochrones mapping in Appendix C has also broken down access to places of worship by broad typologies (Christianity, Islam, Hinduism and Sikhism). This work, looking at the 15 minute networks in Newham, found that as places of worship are the most predominant facility, the majority of the borough is within a 15-minute isochrones of a facility. However, as these facilities are used by different faith groups, this doesn't mean that residents necessarily are within 15 minutes of their chosen place of worship.
<b>Comment</b>	
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Reg18-E-139	Resident	Reg18-E-139/015	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	<p>Thematic workshops: The attempt to sketch common themes undermines specific learning in different community facilities. The attendees are from larger organisations with paid staff which represents a section of the voluntary sector.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Reg18-E-139	Resident	Reg18-E-139/016	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	Facilities Audit: site assessment: The centres chosen are atypical and not representative of community facilities: majority new build or refurbished, majority (5 of 9) from one community organisation, No voluntary and faith sector buildings assessed.	Comment noted. The Community Facilities Needs Assessment (2022) can only provide a snapshot in time about the provision of the particular types of social infrastructure which the evidence base was designed to address (as set out above). The need for certain types of social infrastructure will naturally change over time. However, it will provide a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement.
Reg18-E-139	Resident	Reg18-E-139/017	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	Key findings and recommendations: 2.2.4 Design of facilities: conclusions not representative of facilities independent professional assessment required for mapping due to issues in 2.2.5	We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure the Assessment focuses on. The need for certain types of social infrastructure will naturally change over time and it was not possible, within the scope of this evidence base, to map all the individual facilities or services which community buildings in Newham provide. However, the Assessment has provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. The Assessment has sought to better understand, protect and to guide the future development of Newham's social infrastructure. We have undertaken a number of studies to inform our policy approach. Newham's



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											Community Facilities Needs Assessment (2022) is just one of these studies. The policies in the Social Infrastructure Chapter of the Local Plan have been drafted to acknowledge that community spaces should consider the needs of the users or the intended user.
Reg18-E-139	Resident	Reg18-E-139/018	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	2.2.5 Management: There are low levels of skill, experience and awareness of Facilities issues: examples of this: low levels of disability access, little planned maintenance and business planning. Low awareness of the impact of new legislation for example MEEs regulations. This has not been highlighted in 2.2.5 p21.	Comment noted. This section of the Community Facilities Needs Assessment (2022) reflects the feedback received from the engagement which took place and is the first such evidence base for Newham to provide any understanding of our landscape of community facilities. We thank you for drawing our attention to the need for facilities to provide good access for all. This is indeed missing from this section. Local Plan Policy SI2 is however very clear about the need for facilities to be designed to be inclusive and accessible. This is further expanded on in the implementation text for this policy.
Reg18-E-139	Resident	Reg18-E-139/019	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	2.2.6 Affordability : Charity law imposes restrictions on the operation of facilities that is highly relevant and not given any consideration.	Comment noted. The implications of Charity Law are not a level of detail that this evidence base was able to explore. We thank you for drawing this to our attention.

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Reg18-E-139	Resident	Reg18-E-139/020	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	2.2.6 Affordability : Location is a relevant factor as in section 3.3.4 and 'Town Centre First' INF8 in setion 2.2.2 without consideration of the ability of the voluntary sector to locate in town centres. The voluntary sector do not receive public funds and charitable funding for capital expenditure is limited, diminishing and difficult to obtain. This is evidenced by minutes of the LBN cabinet 3/12/2019 'two thirds of the 30 council owned community centres are VCS run. A sample of 8 of these had average dilapidations of £80,000.	This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. This makes it easier for small scale social infrastructure to locate outside of a Town or Local Centre where prices are recognised as generally being higher than out-of-centre locations.
Reg18-E-139	Resident	Reg18-E-139/021	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	2.3.1 Revision of the Town Centre First Approach The PTAL is outside the control of existing badly served community facilities in some areas of East Ham.	This policy approach has now changed to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.
Reg18-E-139	Resident	Reg18-E-139/022	Community Facilities						Community Facilities Needs Assessment, Publica, 2022	2.3.1 Revision of the Town Centre First Approach: Should the emphasis be on improving public transport and therefore supporting neighbourhoods rather than on punishing CVS organisations that are poorly served.	Comment noted. The Local Plan seeks to deliver improved public transport links, please see the polices in the Sustainable Transport Chapter. We have also changed the policy approach to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2.

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Reg18-E-139	Resident	Reg18-E-139/023	Community Facilities						Community Facilities Needs Assessment, Public, 2022	2.3.2 Two separate policies for community facilities. p23 Essential to preserve existing facilities	A change to this policy approach has not been made. We did not consider this to be necessary as we had already acted on this recommendation in the Community Facilities Needs Assessment (2022) by having one policy in the Regulation 18 Local Plan which addresses existing community facilities (SI1) and one which looks at new and re-provided community facilities (SI2). The approach has not changed in the Regulation 19 Local Plan.
Reg18-E-139	Resident	Reg18-E-139/030	Community Facilities							[Linked to previous comment] These facilities [places of worship] have little access to public funding. The effect of this policy would be to reduce the sustainability, modernisation and availability of some community facility buildings. Successful out of town centre community facility schemes in East Ham such as that developed by BDCA for example would not be facilitated in future under these policies.	This policy approach has now changed to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. The Local Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (SI1) and supporting new social infrastructure (SI2, SI3 and SI4).
Reg18-K-030	Resident	Reg18-K-030/001	Community Facilities			3.91				I admire the commitment to young people that runs through the document, but I see no mention of youth workers. There is a lot of emphasis on spaces that are safe and inclusive, which of course is important, but it requires good, committed, trained, youth workers who will be there for the long term (valued and in secure employment) to see those spaces used well. Will there be a commitment to employing council youth	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan protects community facilities which young people use (Policies SI1-SI4.) The Local Plan cannot stipulate, in a policy, the type of person working in community facilities. That said, an application involving the loss or gain of social infrastructure is required to submit a Social Value and Health Impact Assessment (see Local Plan Policy BFN3). As part of this assessment, it will be possible to better

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										workers or supporting youth workers already working in the borough?	understand who will be working in a proposed new or lost community facility. The Council will encourage the appointment of youth workers where this is appropriate.
Reg18-T-028	Resident	Reg18-T-028/004	Community Facilities							[Change it] We moved to this part of Newham in December 2021 from Hackney and own one of the most expensive houses in the area. My initial impression is that, despite the large number of schools and housing in the vicinity, the immediate area around West Ham Park lacks inviting public and community spaces for families such as cafes, restaurants, markets, allotments, lidos etc. [Originally submitted in response to H1]	Comment noted.
Reg18-T-031	Resident	Reg18-T-031/005	Community Facilities							[Do you have any feedback on this response form?] Disabled people in Newham are too much excluded from many parts of the community, while they should be supported to take part in every aspect of life in an equal way as non-disabled people, education, leisure, sports, culture etcetera. The council should create more measurements that providers oblige to include disabled people as a rule, because it is their right.	A change to this policy has not been made. We did not consider this change to be necessary as Policy S12 requires community facilities to be inclusive and accessible. In the implementation text to Policy S12 our expectations are clearly set out. Including the need for accessible toilets.
Reg18-K-003	Resident	Reg18-K-003/011	Community Facilities			3.91				Quality of libraries varies in the borough - East Ham is modern, but the children's area is small compared to Stratford. Could be improved	A change to this policy approach has not been made. We did not consider this change to be necessary as libraries are protected as community facilities through Local Plan policy

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											SI1. However, the Local Plan cannot influence the types of library services provided.
Reg18-T-010	Resident	Reg18-T-010/007	Community Facilities						[Change it] [Another thing that I find concerning is that we are thinking of building again another tall building when the are clearly suffers from long-standing issues such as: the ugly power lines that should have been addressed long time ago; the noise generated by the Jubilee and DLR lines which generate many complaints per year against Newham and TfL (and that buildings on the Limmo Peninsula would make worse);] the absence of adequate services (schools, pharmacies, GP surgeries, schools, etc.) when compared to the increase in housing supply that Newham is contributing to. [Originally submitted in response to H1]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods.	
Reg18-T-018	Resident	Reg18-T-018/002	Introduction						[Please provide any comments and feedback on the *Introduction*.] [More cleaner places and] more public toilets	Comment noted.	
Reg18-T-018	Resident	Reg18-T-018/007	Community Facilities						[Change it] More social places for teenagers with adults [Originally submitted in response to D7]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of social facilities which teenagers and adults may use.	
Reg18-T-034	Resident	Reg18-T-034/001	Introduction						[Please provide any comments and feedback on the *Introduction*.] Facilities for	Comment noted.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										community activity, health and wellbeing should be paramount.	
Reg18-T-109	Resident	Reg18-T-109/001	Introduction							[Please provide any comments and feedback on the *Introduction*.] With additional housing comes additional pressure on local schools, council facilities	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.
Reg18-T-109	Resident	Reg18-T-109/003	Introduction							[Please provide any comments and feedback on the *Introduction*.] [With additional housing comes additional pressure on local schools, council facilities] and by products can be [ASB] and overload on local utilities	A change to this policy approach has not been made. The Local Plan addresses the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant Site Allocations have also been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Local Plan period in 2038.

Reg18-T-127	Resident and community facility development manager	Reg18-T-127/002	Community Facilities							<p>[Please provide your comments on the Characterisation Study below.] Good access to Primary and community Health and Education are assumed to be able to be accommodated and there is clearly existing social pressures with the current levels of population locally.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											<p>childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/009	Community Facilities						Evidence base	<p>[Please provide your comments on the Built Leisure Needs Assessment below.] This is for the Community Facilities Needs Assessment, Publica, 2022 ( your portal directed me to the wrong assessment)</p> <p>General comment: This assessment needs a great deal of additional research and analysis to be a useful base document some of which is which is highlighted in section 8.1.3 p89. The flaws in the analysis and reasoning negatively affect the higher level policy proposals SP1 and SP2. The following comments illustrate the deficits in the base document.</p>	<p>Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. Alongside the baseline mapping, the facilities audit recognises that</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>many community facilities have a multifunctional role and this has informed the recommendations of the study and the policies.</p> <p>As well as the Community Facilities Needs Assessment, we have undertaken a number of studies to inform our policy approach. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>	
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/010	Community Facilities						Evidence base	<p>[Please provide your comments on the Built Leisure Needs Assessment below.] Methodology p8 Definition of ‘community facilities’ does not include Community health facilities such as access to primary care, day centres and supported residential homes so that older people can stay in the community. [Comment related to CFNA]</p>	<p>Comment noted. The Community Facilities Needs Assessment (2022) sets out the scope of the report on page 8, please see paragraph 1.2.1 and the table on page 9. The need for healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed through partnership working with the London Healthy Urban Design Unit (HUDU) and NHS partners. Housing for older people is addressed in the Strategic Housing Market Assessment (2022).</p>

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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/011	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] The definitions in the methodology do not categorise the capacity to deliver services such as: food banks, sheltering the homeless, cultural events, community learning, art/cookery/ dance/ fitness, advice and counselling, mother and toddler, family gatherings, access to mental health services, bereavement services and palliative care. Some of these would be deemed 'Village Halls' which does have national guidance – not referred to in the policy and guidance review. This is highlighted in section 8.1.3 p89 and is essential to make valid recommendations. [Comment related to CFNA]	Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham's social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn't – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. Alongside the baseline mapping, the facilities audit recognises that

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											<p>many community facilities have a multifunctional role and this has informed the recommendations of the study and the policies.</p> <p>As well as the Community Facilities Needs Assessment, we have undertaken a number of studies to inform our policy approach. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/012	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] The baseline map p42 reinforces the notion that places of worship are only places of worship which is clearly not the case. The mapping does not show the multiple uses and functions of some sites. [Comment related to CFNA]	Comment noted. This was not the intention of the mapping exercise. We acknowledge that faith facilities can provide multiple support services to the local community beyond being a place of worship.
Reg18-T-127	Resident and community facility development	Reg18-T-127/013	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] The consolidated baseline maps give equal value to a public toilet and a library or church	Comment noted. This was not the intention of the mapping exercise. We acknowledge that these facilities provide very different functions in the neighbourhood. Different members of society will naturally value each of these facilities

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	ent manager									which is misleading. [Comment related to CFNA]	differently depending on their personal perspectives.
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/014	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] The assessment assumes public access at all times which is clearly not the case for the majority of facilities. This undermines the value of the baseline mapping on p44 – 46. [Comment related to CFNA]	Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and

<b>Comment Response</b>	<p>providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. Alongside the baseline mapping, the facilities audit recognises that many community facilities have a multifunctional role and this has informed the recommendations of the study and the policies.</p> <p>As well as the Community Facilities Needs Assessment, we have undertaken a number of studies to inform our policy approach. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>
<b>Comment</b>	
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/015	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] A Typology of places of worship would help to map significant differences, needs and effect on social value and integration. [Comment related to CFNA]	Comment noted. The Community Facilities Needs Assessment (2022) has sought to explore the provision of religious meeting places across the borough and is the first such evidence base for Newham to provide any understanding of our landscape of community facilities. The report has addressed the location of faith facilities to the depth required for this evidence base, which has considered a broad range of community facilities and not just those which are places of worship. The Assessment did consider typology of provision against where people, who have described themselves as having a particular religion, live. Please see page 52 of the report which sets out that in 2018, Newham's Muslim population made up 42.1% of its population but that there are 3 Churches for every Mosque or Masjid across the borough. It also found that there are neighbourhoods in East Ham where there are no places of worship for Muslims despite representing between 25 and 35% of the population in those areas. It has also demonstrated that there are very few places of worship, of any faith, in the south of the borough. The mapping on page 42 has mapped the borough's 206 places of worship by broad faith typologies (Buddhism, Christianity, Hinduism, Islam and Sikhism). The isochrones mapping in Appendix C has also broken down access to places of worship by broad typologies (Christianity, Islam, Hinduism and Sikhism). This work, looking at the 15 minute networks in Newham, found that as places of worship are the most predominant facility, the majority of the

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											borough is within a 15-minute isochrones of a facility. However, as these facilities are used by different faith groups, this doesn't mean that residents necessarily are within 15 minutes of their chosen place of worship.
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/016	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] Thematic workshops: The attempt to sketch common themes undermines specific learning in different community facilities. The attendees are from larger organisations with paid staff which represents a section of the voluntary sector. [Comment related to CFNA]	Comment noted. The Community Facilities Needs Assessment sought to be as representative as possible and we invited a wide range of providers and users to participate. The assessment has provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. The Assessment has sought to better understand, protect and to guide the future development of Newham's social infrastructure. We have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies.



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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/017	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] Facilities Audit: site assessment: The centres chosen are atypical and not representative of community facilities: majority new build or refurbished, majority (5 of 9) from one community organisation, No voluntary and faith sector buildings assessed. [Comment related to CFNA]	Comment noted. The Community Facilities Needs Assessment sought to be as representative as possible. The Assessment did include a place of worship, Bonny Downs Baptist Church in East Ham, in the audit. The Assessment has provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. The Assessment has sought to better understand, protect and to guide the future development of Newham's social infrastructure. We have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies.

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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/018	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] Key findings and recommendations: 2.2.4 Design of facilities: conclusions not representative of facilities independent professional assessment required for mapping due to issues in 2.2.5 [Comment related to CFNA]	Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020). The baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. The assessment has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake thorough resident engagement. Alongside the baseline mapping, the facilities audit recognises that

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										<p>many community facilities have a multifunctional role and this has informed the recommendations of the study and the policies.</p> <p>As well as the Community Facilities Needs Assessment, we have undertaken a number of studies to inform our policy approach. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities, have been informed by Newham’s Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham’s Education, Parks and Leisure teams, HUDU and NHS partners.</p>	
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/019	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] 2.2.5 Management: There are low levels of skill, experience and awareness of Facilities issues: examples of this: low levels of disability access, little planned maintenance and business planning. Low awareness of the impact of new legislation for example MEES regulations. This has not been highlighted in 2.2.5 p21. [Comment related to CFNA]	Comment noted. This section of the Community Facilities Needs Assessment (2022) reflects the feedback received from the engagement which took place. We thank you for drawing our attention to the need for facilities to provide good access for all. This is indeed missing from this section. Local Plan Policy SI2 is however very clear about the need for facilities to be designed to be inclusive and accessible. This is further expanded on in the implementation text for this policy.

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Reg18-T-127	Resident and community facility development manager	Reg18-T-127/020	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] 2.2.6 Affordability : Charity law imposes restrictions on the operation of facilities that is highly relevant and not given any consideration. Location is a relevant factor as in section 3.3.4 and 'Town Centre First' INF8 in setion 2.2.2 without consideration of the ability of the voluntary sector to locate in town centres. The voluntary sector do not receive public funds and charitable funding for capital expenditure is limited, diminishing and difficult to obtain. This is evidenced by minutes of the LBN cabinet 3/12/2019 'two thirds of the 30 council owned community centres are VCS run. A sample of 8 of these had average dilapidations of £80,000. [Comment related to CFNA]	Comment noted. The implications of Charity Law is not a level of detail that this evidence base was able to explore. We thank you for drawing this to our attention.
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/021	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] 2.3.1 Revision of the Town Centre First Approach The PTAL is outside the control of existing badly served community facilities in some areas of East Ham. Should the emphasis be on improving public transport and therefore supporting neighbourhoods rather than on punishing CVS organisations that are poorly served. [Comment related to CFNA]	This policy approach has now change to allow greater flexibility with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA), as set out in Policy SI2. The Local Plan addresses the need for social infrastructure through protecting existing community facilities and health facilities (SI1) and supporting new social infrastructure (SI2, SI3 and SI4).
Reg18-T-127	Resident and community facility developm	Reg18-T-127/022	Community Facilities						Evidence base	[Please provide your comments on the Built Leisure Needs Assessment below.] 2.3.2 Two separate policies for community facilities. p23 Essential to preserve existing facilities [Comment related to CFNA]	Support noted. The Regulation 19 Plan continues to have separate policies for the protection of existing facilities and another for the provision of new space, reflecting the recommendation in the Community Facilities Needs Assessment (2022).

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	ent manager										
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/023	Community Facilities						Evidence base	[Do you have any additional comments on the evidence base documents?] Yes, similar research to the LB of Barking and Dagenham: Faith groups and meeting places evidence base study CAG Consultants Nov 2017. A study of the role of 'village Halls' and their relevance and value to urban settings (a great deal of research and papers from the Joseph Rowntree Foundation is available).	Comment noted. We welcome the direction provided to this study to add to our understanding in this area.
Reg18-T-127	Resident and community facility development manager	Reg18-T-127/024	Community Facilities						Evidence base	[Do you have any additional comments on the evidence base documents?] The role and nature of the voluntary sector does not appear to have been properly considered in the existing base documents. A study looking at the relationship and opportunities for co working and understanding could be very valuable.	Comment noted. Further detail on the role and nature of the voluntary sector sits outside the scope of the Community Facilities Assessment (2022). Whilst a study looking at the relationship and opportunities for co working and understanding could be very valuable it is not a level of detail we can explore for the Local Plan evidence base.

Reg18-E-092	Royal Docks	Reg18-E-092/024	Community Facilities					<p>Community Facilities</p> <p>We suggest that further work is undertaken to consider the phasing and design of community facilities across the Royal Docks &amp; Beckton. This is to ensure that appropriate consideration is given to how the new and existing facilities complement each other and meet the needs of the existing, new and growing population. This should be considered as part of a wider review and implementation plan for Social Infrastructure in the OA.</p>	<p>Comment noted. A change to this policy approach has not been made. How we assess the need for facilities and secure delivery differs between different types and providers of social infrastructure, which include:</p> <ul style="list-style-type: none"> <li>• Social infrastructure we have a statutory duty to provide: schools; some early years provision</li> <li>• Social infrastructure with a nationally set target: playing pitches; built leisure facilities; health facilities</li> <li>• Council delivered Social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres</li> <li>• Community/charity/market-led: wider youth provision; faith facilities; private built leisure facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.</li> </ul> <p>To understand, protect and to guide the future development of Newham’s social infrastructure we have undertaken a number of studies to inform our policy approach. Newham’s Community Facilities Needs Assessment (2022) is just one of these studies. It provides an audit of the borough’s existing community facilities and considers how the future growth of Newham’s neighbourhoods may influence the need for new services, to make it easier to live well, in better connected communities. The study provides information on the buildings and spaces which provide community meeting places. These include shared space within education facilities, community centres, youth zones, social clubs, libraries, public halls and exhibition halls, public houses, public toilets, places of worship, music venues, cinemas, theatres, galleries, museums (Use class F and Sui generis - 2020).</p> <p>In addition to the Community Facilities Needs Assessment (2022), the need for sporting facilities, playing pitches, educational uses,</p>
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											childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2024), Playing Pitch Strategy (2024), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.
Reg18-S-001	Shelter	Reg18-S-001/003	Community Facilities							Spaces needed for people who are homeless with computers, classrooms, public toilets, meeting spaces	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing

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											(SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of facilities which people who are homeless may use.
Reg18-S-001	Shelter	Reg18-S-001/011	Community Facilities							Community uses - there is a struggle for support groups in the third sector to find affordable spaces. Groups like Shelter rely heavily on the third sector.	This policy approach has now changed to provide better guidance on what we consider an affordable space to be. Please see the implementation text for Local Plan Policy SI1. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Local Plan policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.
Reg18-E-118	Sport England	Reg18-E-118/034	Community Facilities						CF4.5	Sport England welcomes the reference to Sport England's guidance in CF4.5 but the guidance referred to relates to Sport England's Planning Policy rather than design guides. Is that the intention?	Comment noted. Reference has been update to link to Sport England online design and cost guidance publications.
Reg18-K-022	West Silvertown Foundation	Reg18-K-022/002	Community Facilities							[About South-West of the Royal Docks (West Silvertown area)] Other amenities are also overstretched or non-existent: we need more GP surgeries, and we are yet to have a medium or large supermarket in the area, which is desperately needed. " [originally submitted in response to clause 5 of BNF1 Spatial Strategy]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Social Infrastructure chapter seek to protect existing (SI1) and support new spaces (SI2, SI3 & SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods.