

# Newham Draft Submission Local Plan Duty to Cooperate Statement

July 2024

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## Chapter 1: Introduction

- 1.1. This duty to cooperate statement demonstrates how the London Borough of Newham (Newham) has prepared the Newham Draft Submission Local Plan (Regulation 19) in accordance with the legislative and national planning policy requirements for effective joint working on strategic cross-boundary matters. The statement highlights the actions and outcomes of engagement undertaken with duty to cooperate prescribed bodies, and how these have informed the Local Plan on an active and on-going basis leading up to the consultation on the Draft Submission Local Plan (July 2024).

## Chapter 2: Legislative and national policy context

- 2.1 This chapter outlines the legislative and national planning policy requirements that have informed this Duty to Cooperate Statement and the approach taken by the council in the preparation of the Local Plan.

### **Localism Act 2011 and the Planning and Compulsory Purchase Act 2004**

- 2.2 The duty to cooperate requirement on Local Planning Authorities was introduced through Section 110 of the Localism Act (2011), which inserted Section 33A into the Planning and Compulsory Purchase Act 2004. This places a legal duty on Local Planning Authorities and other prescribed bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of the local plan-making process in the context of strategic matters.
- 2.3 Strategic matters are defined in the legislation as, sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

### **Town and Country Planning (Local Planning) (England) Regulations 2012**

- 2.4 The preparation of local plans is governed by the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations set out a list of prescribed bodies that are subject to the duty to cooperate. The prescribed bodies include:
  - The Environment Agency
  - the Historic Buildings and Monuments Commission for England (now known as Historic England) Natural England
  - The Mayor of London
  - The Homes and Communities Agency (now known as Homes England)

- The Civil Aviation Authority
- Each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006
- The Office of Rail and Road
- Each Integrated Transport Authority (for Newham this is Transport for London (TfL))
- Each highway authority within the meaning of section 1 of the Highways Act 1980(6) (including the Secretary of State, where the Secretary of State is the highways authority) (for Newham borough this is National Highways, TfL and the council) and
- The Marine Management Organisation

## **The National Planning Policy Framework and Planning Practice Guidance**

### *National Planning Policy Framework (NPPF)*

- 2.5 The National Planning Policy Framework (NPPF) 2023 details policies on plan-making, including maintaining effective cooperation as set out in paragraphs 24-26. These policies set out that local planning authorities have a duty to cooperate with each other and with other prescribed bodies on strategic matters that cross administrative borders. The NPPF outlines strategic policy making authorities should collaborate to identify the relevant cross boundary issues that need to be addressed in their plans. Newham's approach to identifying these is outlined in [Chapter 3](#).
- 2.6 The NPPF also requires strategic policy-making authorities to engage with local communities and other relevant public bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected mayors and combined authorities. Further information on how Newham has engaged with these public bodies is set out in [Chapter 3](#).
- 2.7 Paragraph 27 states that in order to demonstrate effective and on-going joint working, strategic policy-making authorities should produce one or more Statements of Common Ground, documenting the cross-boundary matters being addressed, and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency. See [Chapter 5: Next Steps](#) for information on Newham's approach to preparing Statements of Common Ground, and [Appendix 2: Statement of Common Ground on Strategic Matters between London Borough of Barking & Dagenham and London Borough of Newham](#).

### *Planning Practice Guidance (PPG)*

- 2.8 The Planning Practice Guidance (PPG) reiterates that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing or supporting the preparation of policies which address strategic matters and that these authorities should

produce, maintain and update one or more statement(s) of common ground throughout the plan-making process (Paragraph: 009 Reference ID: 61-009-20190315).

- 2.9 Paragraph 010 Reference ID: 61-010-20190315 sets out that a statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate. Paragraph 011 Reference ID: 61-011-20190315 through to Paragraph: 028 Reference ID: 61-028-20190315 set out the process for preparing a statement of common ground. The guidance states that statements need to be prepared and then maintained on an on-going basis throughout the plan making process and should be available on a local authority's website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.
- 2.10 The PPG advises that the statement of common ground is the means by which strategic policy-making authorities can demonstrate that a plan is based on effective cooperation and that they have sought to produce a strategy based on agreement with other authorities. Local planning authorities on how to fulfil their duty to cooperate requirements, particularly in relationship to producing statements of common ground.
- 2.11 Paragraph 31 Reference ID: 61-031-20190315 of PPG outlines how the duty to cooperate and other legal requirements will be considered at local plan examination. An Inspector will consider all available evidence, including statements of common ground, Authority Monitoring Reports and other submitted evidence such as the statement of compliance. As the duty to cooperate relates to the preparation of the plan, it cannot be rectified post-submission. See [Chapter 5](#) for further information on Newham's approach to statements of common ground, and [Appendix 2: Statement of Common Ground on Strategic Matters between London Borough of Barking & Dagenham and London Borough of Newham](#).

## Chapter 3: Demonstrating compliance with the duty to cooperate

- 3.1 This section outlines the process that we, the local planning authority, have undertaken to proactively and effectively engage with our neighbouring planning authorities, prescribed bodies and other relevant public bodies, to meet our duty to cooperate requirements. Newham has proactively and effectively engaged with its neighbouring authorities, prescribed Duty to Cooperate bodies and other public bodies. This has been achieved through stakeholder meetings, written representations on draft policies, and engagement during the preparation of evidence base documents.

### Stages of consultation and engagement

- 3.2 The council has undertaken two rounds of consultation to inform the Newham Draft Submission Local Plan. This includes:
- **Issues and Options Consultation:** This took place between 18 October and 17 December 2021. At the start of this consultation period, we sent out a specific email to duty to cooperate bodies to notify them of the consultation and to welcome them to raise any duty to cooperate matters in their consultation responses.
  - **Draft Local Plan Consultation (Regulation 18):** This took place between the 9 January and 20 February 2023. Duty to cooperate bodies were notified and invited to make representations on the Draft Local Plan.

### Cooperation with Mayor of London and GLA

- 3.3 The Local Plan must generally conform to the London Plan, produced by the Mayor of London. The London Plan serves as a statutory spatial development strategy for Greater London, ensuring coordinated planning across all London boroughs. The latest London Plan was published on 2<sup>nd</sup> March 2021.
- 3.4 Many strategic cross-boundary matters addressed by effective cooperation as part of Newham's duty to cooperate are also covered in the London Plan. These include housing needs, the provision of employment land, commercial areas such as town centres, and green infrastructure. Additionally, the London Plan offers a framework for delivering strategic infrastructure, with further details to be provided in the development of local plans.
- 3.5 The National Planning Policy Guidance (PPG) provides guidance for combined authority areas such as Greater London. It stipulates that London boroughs must cooperate with each other, as well as with other local authority areas outside London and other prescribed public bodies (Paragraph: 033 Reference ID: 61-033-20190315). It also emphasises that the extent of cooperation with partners depends on how extensively the strategic matters have already been addressed in the spatial development strategy.
- 3.6 Newham works closely with the Mayor of London and the Greater London Authority (GLA), which includes Transport for London (TfL). Throughout the process of preparing the Local Plan, Newham has

engaged regularly with the GLA. This collaboration is shown throughout [Chapter 4](#), which outlines the evidence of engagement of strategic and cross boundary matters. Some of the key engagement activities we have undertaken with the GLA have been on:

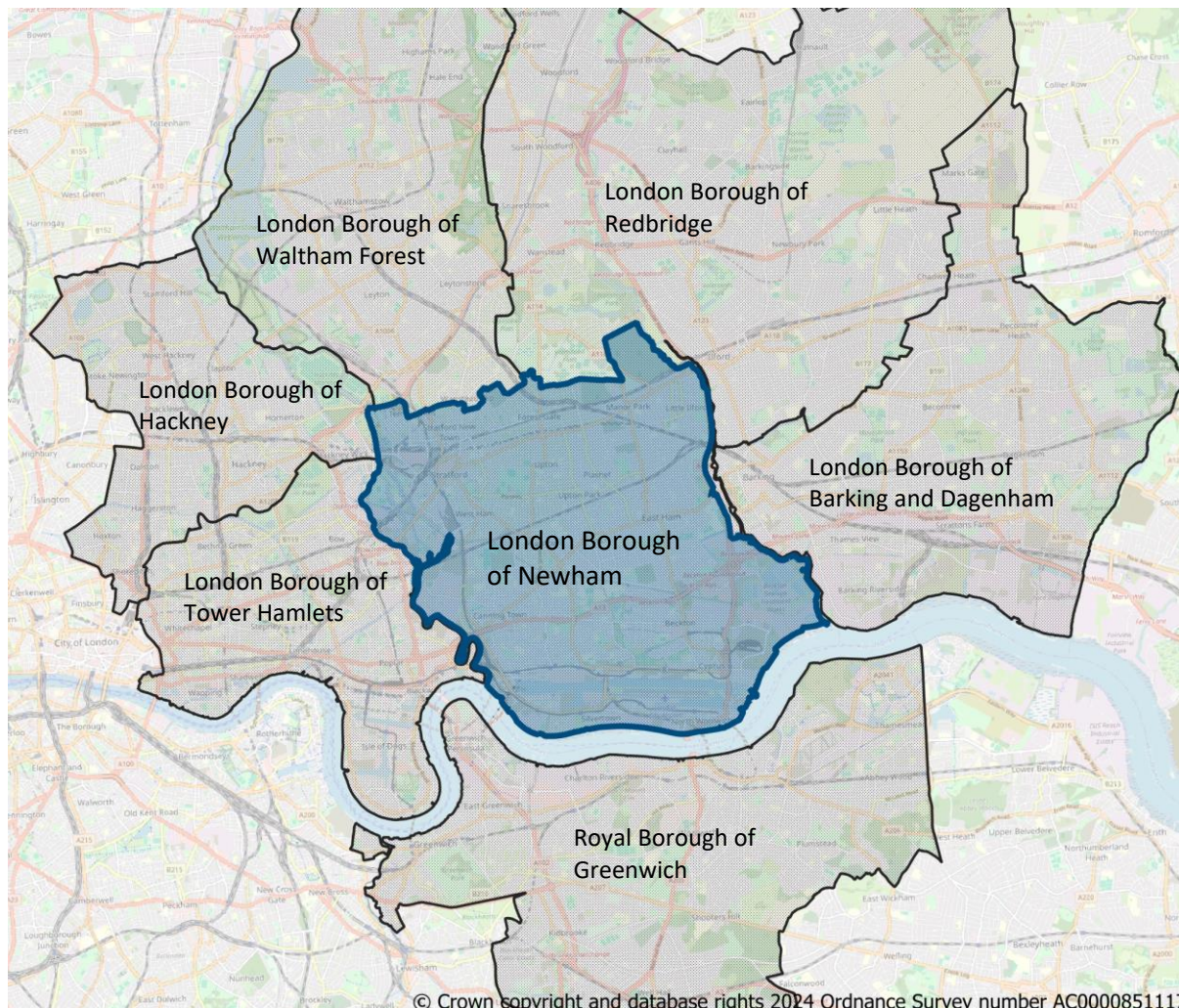
- The London Strategic Housing Land Availability Assessment (SHLAA) (2017) – Newham along with other local planning authorities (LPAs), worked with the GLA on the SHLAA 2017. This was a technical exercise to determine the quantity and suitability of potential land for housing development in London. The findings of this assessment are an evidence base that has informed the London Plan (2021) and the borough-wide housing targets. Newham actively contributed to extensive site screening and assessment exercise. Newham is currently working with the GLA and other London boroughs on the development of a new digital SHLAA system. This project is being led by the GLA, and will update the findings of the 2017 SHLAA.
- Population projections – we have used the GLA’s population projections for the borough to inform Newham’s evidence base and the preparation of the Local Plan. These projections are based on Newham’s housing targets.

- 3.7 The borough was part of a local enterprise partnership called the London Economic Action Partnership (LEAP). LEAP was a partnership through which the Mayor of London and Transport for London engaged with London boroughs and business stakeholders to identify strategic issues and plan for economic development. However, the partnership was disbanded in March 2023 and the GLA have absorbed the responsibilities of LEAP.
- 3.8 The Royal Docks is home London’s only Enterprise Zone, overseen by the council and the GLA, which started in 2013. The Enterprise Zone is estimated to have potential to deliver 35,000 new jobs and 4,000 new homes within the zone, and over 55,000 new jobs and 36,000 new homes in the wider Royal Docks and Beckton Riverside Opportunity Area. The Enterprise Zone is likely to attract £5bn of private and public investment by 2037/8, including £600m of TfL investment in the DLR network. It is overseen by two boards, the Enterprise Zone Programme Board and the Officer Level Programme Board.
- 3.9 The Royal Docks and Beckton Opportunity Area (RD + BR) is designated by the GLA in the London Plan. The RD + BR Opportunity Area Planning Framework (OAPF) has been prepared jointly by the GLA, TfL, London Borough of Newham and the GLA’s Royal Docks Team, and provides a planning framework to guide development in the area. The framework also sets the context for the proposed extension of the DLR to Thamesmead via Beckton Riverside. The RD+BR OAPF identifies the potential, with transport and connectivity improvements in place, for the OA to provide 36,300 new homes and create 55,700 new jobs.

### **Cooperation with neighbouring local authorities**

- 3.10 The borough is situated in East London, and is an Inner London Borough bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

**Figure 1: Map showing the geographic relationship between Newham and neighbouring boroughs.**



3.11 The area depicted in **Figure 1** outlines the boundaries of Newham and its neighbouring boroughs, as listed above. These neighbouring boroughs are considered key Duty to Cooperate partners due to their geographic proximity to Newham.

*Local London*

3.12 In addition, Newham is involved in a sub-regional partnership known as Local London. This partnership was founded in 2016 and consists of nine local authorities in northeast and southeast London. The Joint Committee is made up of the elected leaders or Mayor of:

- Barking and Dagenham
- Bexley
- Bromley



- Greenwich
- Havering
- Enfield
- Redbridge
- Waltham Forest
- Newham

3.13 The partnership is dedicated to achieving inclusive and sustainable growth, as well as creating opportunities for residents and businesses to succeed. They aim to achieve this by managing former European regional development skills programmes at a sub-regional level.

*Association of London Borough Planning Officers*

3.14 Newham is one of the 32 London Borough Councils, in addition to the City of London Corporation. The London Borough Councils participate in the Association of London Borough Planning Officers (ALBPO). Newham's planning officers regularly attend the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group, where cross-boundary strategic matters are discussed.

*East London Waste Authority*

3.15 As a participating member of the East London Waste Authority (ELWA), Newham officers often engage with ELWA, which was formed in 1986 as a Statutory Waste Disposal Authority (WDA), responsible for the disposal of waste collected by London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge. In 2023, ELWA published an updated Joint Strategy for East London's Resources and Waste (2027-57). The Joint Strategy sets out the aims, objectives, priorities and actions for the Partner Authorities on preventing and reducing waste, increasing reuse and recycling, supporting improvements with infrastructure, and monitoring performance. Newham, the east London boroughs of Havering, Barking and Dagenham and Redbridge and ELWA work collaboratively to address Duty to Cooperate matters. This includes the east London boroughs keeping ELWA informed of the progress on the update of the East London Joint Waste Plan.

*London Waste Planning Forum*

3.16 Newham is also involved in the London Waste Planning Forum (LWPF). The forum consists of Local Planning authorities, the GLA, the Environment Agency and private sector organisations. The forum aims to enable authorities to engage and cooperate on strategic cross boundary waste matters, including the update of regional waste plans.

*Cooperation with the London Borough of Redbridge*

3.17 Newham has engaged with LB Redbridge on Biodiversity Net Gain (BNG) and other matters following its introduction in the Environment Act 2021. This includes work around Epping Forest and discussions were held during 2023 to consider a shared ecologist role to support both boroughs with biodiversity net gain. It was agreed to share a full time role, with management held by Newham, and time and costs equally split. Recruitment commenced in January 2024 and a service level agreement

was drawn up to agree resource sharing between the authorities. We will hopefully complete recruitment and use the shared resource to both meet our new duty and also work more closely together on biodiversity matters.

#### *Low Carbon Development Working Group*

- 3.18 Since August 2020, Newham has attended regular sessions of the Low Carbon Development Working Group (coordinated by London Councils) as well as more ad-hoc sessions with local authorities in a group or 1:1 setting. There is general collective agreement on the policy approach required to achieve net zero in new development in London, by using absolute energy targets or using substantially higher percentage reductions from Part L 2021 Building Regulations.

#### *Cooperation with the London Legacy Development Corporation (LLDC)*

- 3.19 The local planning authority shares a boundary with the LLDC, which acts as the planning authority for the Queen Elizabeth Olympic Park.
- 3.20 The LLDC will return planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney by the end of December 2024. Newham meets regularly with the LLDC and other host boroughs. These meetings have discussed the LLDC transition governance arrangements and LLDC sites within Newham's boundary.
- 3.21 Newham attends the LLDC Planning Policy Forum. This is a regular meeting convened by the LLDC with representatives of the planning policy and infrastructure teams from the LLDC and the London Boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest. The purpose of the meeting is to coordinate and cooperate on planning policy matters across the LLDC area.

#### **Cooperation with the Environment Agency**

- 3.22 This includes work with the Environment Agency to agree the methodology and provide data for the Strategic Flood Risk Assessment and their involvement in a GLA-led Local Integrated Water Management Strategy for the Royal Docks and Beckton Opportunity Area. The Environment Agency, alongside Natural England, were also part of joint work with the GLA, Thames Water and neighbouring boroughs on a Strategic Integrated Water Management Strategy.

#### **Cooperation with the Natural England**

- 3.23 Newham have collaborated with Natural England and other relevant responsible bodies on protecting the integrity of Epping Forest Special Area of Conservation, including through the regular Epping Forest Oversight Group.

#### **Cooperation with Historic England**

- 3.24 Historic England have provided feedback on a range of policies in the Local Plan and the evidence which underpins them. In addition, running in parallel, but separately to, the Local Plan development, we have been working with them and the GLA on piloting an approach to developing a London Heritage Engagement Strategy, to support the delivery of policy HC1 in the London Plan.

### **Cooperation with Homes England**

- 3.25 Newham has worked with Homes England on unlocking the Beckton Riverside site allocation through the delivery of a DLR line extension. Newham's work with Homes England includes support on technical work for the DLR extension to Thamesmead via Beckton Riverside, assessing a variety of DLR route alignments and station locations. We also held discussions with Homes England around the interim Beckton Sewage Treatment Plant Odour report. More information of this can be found in [Chapter 4: Water Supply and Waste Water Supply](#).

### **Cooperation with Marine Management Organisation**

- 3.26 The Marine Management Organisation (MMO) are responsible for preparing marine plans for English inshore and offshore waters. The Marine Plan boundaries extends up to the level of the mean high water spring tides marks. As a result, when Newham make decisions that affect the UK marine area, they must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan 2021 or UK Marine Policy Statement, unless relevant considerations indicate otherwise. The MMO were invited to make representations during each Local Plan consultation, which they did. The responses to their comments are set out in the relevant consultation reports.

### **Cooperation with the Lee Valley Regional Park Authority**

- 3.27 Newham benefits from access to the Lee Valley Regional Park, created in 1966 and managed by the Lee Valley Regional Park Authority, significant parts of which lie within the borough. We have therefore engaged with the Lee Valley Regional Park Authority during the production of the Plan. This includes work to consider the appropriate approach in Newham's emerging Local Plan to ensuring the protection and enhancement of the Lee Valley Regional Park and to also support the Lee Valley Regional Park Authority's Park Development Framework. More information of this can be found in [Chapter 4: Green and Water Infrastructure](#).

### **Cooperation with Sport England**

- 3.28 Sport England is a non-departmental public body under the Department for Culture, Media and Sport and a statutory consultee on planning applications affecting playing fields. Sport England advice local authorities that they should be consulted more widely on issues relating to playing fields. Therefore we have worked with Sport England to agree the approach to Newham's Built Leisure Needs Assessment (2024) and Playing Pitch Strategy (2024). Sport England also supported Newham in the interpretation of these studies for both the approach to Local Plan policy and specific site allocation requirements. More information of this can be found in [Chapter 4: Social Infrastructure](#).

### **Cooperation with the Civil Aviation Authority**

- 3.29 The Civil Aviation Authority been invited to make representations during each Local Plan consultation, but provided none.

### **Cooperation with National Highways**

- 3.30 National Highways (formerly Highways England) operates, maintains and improves England's motorways and major A roads. Newham does not contain any roads under the purview of National Highways. Newham sent National Highways notifications regarding Local Plan consultations and responses to their comments are in the consultation report.

### **Cooperation with the Office for Rail and Road**

- 3.31 The Office of Rail and Road is the independent safety and economic regulator for Britain's railways and monitor of National Highways. Newham sent the Office of Rail and Road notifications regarding the Local Plan consultation, no responses were received.

### **Cooperation with Transport for London**

- 3.32 Transport for London (TfL) are the integrated transport authority for London. They run the day-to-day operation of the capital's public transport network and manage London's main roads. TfL is guided by the Mayor's Transport Strategy and its target that 80% of all journeys will be made on foot, by cycle or using public transport by 2041. Newham sets out how we will meet the objectives of this strategy in our Local Implementation Plan (LIP) and Sustainable Transport Strategy. Through the LIP process, TfL provides Newham with financial support to improve our transport network. TfL also comments on a wide range of planning applications, guiding sustainable development and compliance with both local and regional planning policy.
- 3.33 TfL provided responses at both the Issues & Options and Regulation 18 consultation stages and responses to their comments are in the consultation report. TfL also responded to the Sustainable Transport Strategy consultation. Further information on engagement with TfL can be found in [Chapter 4: Transport](#).

### **Cooperation with health and social care bodies**

- 3.34 Newham was worked collaboratively with a number of health and social care bodies including: NHS North East London (the Integrated Care Board for north-east London, formed in July 2022, replacing the North East London Clinical Commissioning Group), Newham's partnership (which brings together the council, the East London NHS Foundation Trust, North East London Foundation Trust, Barts Health NHS Trust, primary care networks and the Newham Health Collaborative to provide primary, secondary and tertiary care and community health services in Newham), Health and Care Spaces Newham (HCSN) and London Healthy Urban Development Unit (HUDU).

These Foundation Trusts are prescribed duty to cooperate bodies, meaning Newham has a duty to engage with these bodies on strategic issues. Further information of these bodies and how strategic issues have been addressed through our cooperation with the referenced bodies can be found in [Chapter 4: Social Infrastructure. Appendix 1](#) summarises our response to engagement with NHS partners who responded to the Draft Local Plan.

#### **Cooperation with the Metropolitan Police Service**

- 3.1 Newham worked collaboratively with the Metropolitan Police Service and its Secured by Design office. This body is a statutory consultee on specific planning applications. Newham sent the Metropolitan Police Service notifications regarding Local Plan consultations and has received written responses at both stages. Further information of the comments received and how strategic issues have been addressed can be found in [Chapter 4: Design, including tall buildings](#).

#### **Cooperation with Local Nature Partnerships**

- 3.2 Newham has engaged with the London Wildlife Trust (a Local Nature Partnership) on a number of relevant projects. Newham has engaged with the London Wildlife Trust on our evidence base documents – the Newham Green Belt and Metropolitan Open Land Review (2024), and the Newham Green and Water Infrastructure Strategy. The London Wildlife Trust has also reviewed our Sites of Importance to Nature (SINCs).

#### **Cooperation with Port of London Authority.**

- 3.3 Newham has engaged with the Port of London Authority throughout the plan making process, in particular regarding safeguarded wharves. In addition, in December 2024, the Port of London Authority (PLA) published the draft 'Tidal Thames Masterplan – London Borough of Newham' for consultation, which highlighted the importance to protect the existing industrial operations and promote continuous growth at the safeguarded wharves in Newham with consideration on the agent of change principle to developments adjacent to the wharves. In February 2024, Newham submitted written comments to the PLA Tidal Thames consultation, expressing our views on the draft masterplan, including our support on the above proposal regarding the safeguarded wharves.

## Chapter 4: Duty to Cooperate outcomes on strategic matters

- 4.1 This chapter of the Duty to Cooperate Statement outlines the key strategic matters and issues discussed throughout the plan-making process with prescribed duty to cooperate bodies. This chapter also summarising the engagement with non-prescribed bodies, which are neighbouring boroughs and other relevant public bodies.
- 4.2 The strategic matters have been identified in accordance with the Planning and Compulsory Purchase Act 2004 and paragraphs 20 and 21 of the NPPF. A log of engagement on the strategic issues has been maintained and continuously reviewed throughout the Local Plan Refresh.
- 4.3 Arranged under each strategic matter, the background context of each strategic issue is outlined in relation to the duty to cooperate. This is followed by the evidence and key discussions and outcomes of engagement with the relevant bodies throughout the Issues and Options, Regulation 18 stages of the Draft Local Plan.

### Plan Making and Delivery

| Duty to Cooperate Bodies  |   |
|---|---|
| <b>Prescribed</b>   | The Mayor of London (GLA), Transport for London (TfL) |
| <b>Non-prescribed</b>   | Neighbouring boroughs, LLDC, Royal Docks Team (RDT)   |
| Strategic Issues  |   |
| <ol style="list-style-type: none"> <li><b>Royal Docks and Beckton Opportunity Planning Framework, input into the Local Plan and delivery</b></li> <li><b>London Legacy Development Corporation (LLDC) transition</b></li> </ol> |   |

#### 1. Royal Docks and Beckton Opportunity Planning Framework, input into the Local Plan and delivery

##### Background

*Royal Docks and Beckton Riverside Opportunity Area (RD+BR OA)*

- 4.4 An Opportunity Area Planning Framework is a non-statutory spatial guidance document that supports the implementation of the London Plan in relation to the Opportunity Area it is prepared for. The Royal Docks and Beckton Riverside Opportunity Area (RD+BR OA) is one of the largest regeneration areas in London and occupies most of the southern part of the borough. It is designated under the London Plan (2021) Policy SD1 Opportunity Areas.

- 4.5 The preparation of the RD+BR OAPF began in 2019, with the establishment of the delivery governance structure, chaired by the Deputy Mayor for London Jules Pipe and with Newham represented by Mayor Fiaz.
- 4.6 The work was led by the GLA, but with significant input from the planning policy team and other departments in Newham. Regular Officer Steering Groups were held during the development of the document with representation from the GLA planning team, GLA Royal Docks team, TfL and Newham.
- 4.7 Key milestones in the process were:
- June to October 2019, 8-week early-stage engagement via community ‘listening events’ – to identify key issues and opportunities from communities;
  - October 2019 – October 2020, drafted Vision and Principles consultation document;
  - 12 October to 27 November 2020, Vision and Principles 8-week consultation, with public workshops and consultation events – to report back to communities on the ambition and objectives of the document and receive further feedback to shape the context, scope, and purpose of the OAPF;
  - Theme based workshops with LBN teams in 2020-21 – to develop the chapters and provide an opportunity to highlight strategies, evidence, and key priorities for Newham from specialist areas.
  - ‘Internal Consultation Draft’ stage to develop the full guidance document ahead of first statutory public consultation in 2022;
  - February to 27 March 2022, formal 6-week public consultation;
  - 2nd November 2022, final adoption draft signed off via a Strategic Board meeting.
  - 25th May 2023, Mayor of London adoption of RD+BR OAPF as guidance to the London Plan (2021)
- 4.8 The evidence underpinning the RD+BR OAPF included:
- A business case to extend the DLR from Gallions Reach to Thamesmead via Beckton/Beckton Riverside. It does this by illustrating the potential development and place-making opportunity unlocked by an extended DLR. Technical work on the DLR extension to Thamesmead via Beckton Riverside to date, including assessing a variety of line alignments and station locations, has been further developed with support from Royal Borough Greenwich, Homes England, Department of Levelling Up, Housing and Communities (DLUHC), Department for Transport (DfT), and stakeholders including landowners and developers at Beckton and Thamesmead. This work is ongoing. Further information is provided in [Chapter 4: Transport](#) section of this statement.
  - A Transport Strategy and a Local Connections Strategy, which propose a range of improvements to support higher density development such as additional DLR and bus capacity, alongside improved public realm and connectivity to support active travel.

- An assessment of energy requirements and potential options for enhanced capacity through new local substations.
- An Integrated Water Management Strategy to minimise pressure on the existing sewage infrastructure and mitigate climate change risks including flood and droughts.

### **Key discussion points and outcomes**

#### *Relationship to the adopted and emerging Local Plan*

- 4.9 The timing of the development of the OAPF ran alongside the delivery of Newham's adopted Local Plan as well as the commencement of the Local Plan Review. It was agreed that the OAPF needed to remain in conformity with the adopted Local Plan, but the evidence, recommendations and guidance would help inform the emerging Local Plan.
- 4.10 As such, the following elements of the OAPF have been taken forward in the Submission Local Plan to support the delivery of the OAPF:
- The OAPF Places sections have informed the neighbourhood-specific visions and policies.
  - A requirement to deliver the site specific requirements of the Integrated Water Management Strategy.
  - Energy requirements and potential options for enhanced capacity through new local substations were considered in the development of site allocations.
  - The Transport Strategy and a Local Connections Strategy informed Newham's Strategic Transport Strategy, in particular the growth modelling and recommended cycling and walking network.
  - Capacity modelling, design recommendations and Places chapters were reviewed and incorporated into the Characterisation Study.
  - Ongoing discussions regarding the role of Town Centres in the Opportunity Area have fed into consideration of the Town Centre network. Further information regarding this strategic issue is covered in the approach to revised Town Centres Network set out in [Chapter 4: Town Centres](#).

#### **Next steps**

- 4.11 We continue to work with the GLA planning and Royal Docks teams, TfL and other partners on delivering the OAPF, in particular the business case for the DLR extension.
- 4.12 The OAPF forms part of Newham development plan, as a London Plan Guidance document under the London Plan 2021. Newham will consider adoption of the OAPF as a supplementary planning document under the new Local Plan.



## **2. London Legacy Development Corporation (LLDC) transition**

### **Background**

- 4.13 The LLDC is a Mayoral Development Corporation covering parts of the London Boroughs of Newham, Hackney, Tower Hamlets and Waltham Forest (the Four Boroughs) in and around the Queen Elizabeth Olympic Park. It was established by the Secretary of State by a Statutory Instrument in 2012, under powers provided by the 2011 Localism Act. This Statutory Instrument also gave the LLDC planning functions for the areas of the boroughs it covers.
- 4.14 In September 2022, the Mayor of London confirmed that the planning powers should be returned to the boroughs on the 1 December 2024. A Statutory Instrument to enable this is currently being drafted. Once powers are transferred the boroughs will still be required to use the adopted LLDC Local Plan to assess planning applications until they have adopted a Local Plan which incorporates the entirety of their boroughs, including the area previous planned for by the LLDC.
- 4.15 A Memorandum of Understanding signed by the Four Boroughs and the LLDC sets out detailed day to day arrangements in place between the LLDC as Local Planning Authority and the Four Boroughs. The MOU includes the requirement for a Planning Policy Forum to meet every 6 weeks, unless otherwise agreed, to coordinate and cooperate on planning policy matters. The Forum continues to meet and functions well, coordinated and chaired by the LLDC.

### **Key discussion points and outcomes**

#### *Transitional plan-making approach*

- 4.16 During the commencement process for the Local Plan Review, discussions were held in 2020 and 2021 with the LLDC, Newham and the other boroughs to discuss how best boroughs could commence Plan Making during the transitional period but in advance of formal transition.
- 4.17 It was agreed that as the LLDC was not intending to review its Local Plan, boroughs should start to include the portion of their boroughs currently planned for by the LLDC within their Local Plan Reviews once they commence them. These policies could then be applied in the LLDC area of the borough following the transition of planning powers.
- 4.18 To ensure this approach was clearly communicated and that all interested parties and stakeholders were informed, the LLDC agreed and undertook to share all details of the Local Plan refresh consultation with their consultation database and attended geographically relevant consultation meetings to help explain the transition and answer questions of more relevance to then, as current LPA.

#### *Information and data sharing*

- 4.19 To support the development of the Local Plan, the LLDC agreed and undertook to share all relevant evidence base documents, mapping, monitoring information and associated methodologies used to develop their planning policy documents and undertake statutory monitoring.
- 4.20 A series of themed discussions took place in 2021, 2022 and 2023 in the Planning Policy Forum meetings to go through each of the relevant documents and the information within them has been used to develop the Draft Submission Local Plan, in particular the housing trajectory, site allocations

and neighbourhood policies. It is noted that we have not always chosen to use the same approach as the LLDC, but have sought to align the information with the approach considered suitable for the whole of the borough. Further details on specific strategic issues are addressed in other parts of this statement.

### Next steps

- 4.21 We will continue to work with the LLDC, through the Planning Policy Forum and associated meetings to coordinate and cooperate on planning policy matters. Further information about the work with the LLDC on emerging site allocations from the LLDC transition is in [Chapter 4: Sites](#).

## Housing

| Duty to Cooperate Bodies   |                             |
|--|-----------------------------|
| <b>Prescribed</b>  | The Mayor of London (GLA)   |
| <b>Non-prescribed</b>  | Neighbouring boroughs, LLDC |
| Strategic Issues   |                             |
| <ol style="list-style-type: none"> <li>1. <b>Newham’s housing target</b></li> <li>2. <b>Gypsy and Traveller need and site allocations</b></li> </ol> |                             |

### 1. Newham’s housing target

#### Background

- 4.22 Newham’s housing target set out in the London Plan (2021) seeks to deliver 47,600 homes between 2019/20 and 2028/29. This target comprises 32,800 homes to be delivered in the part of the borough administered by the council, plus an additional 14,800 homes in the part of the borough currently administered by the London Legacy Development Corporation (LLDC). This target was informed by the findings of the Greater London Authority’s Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were both published in 2017. Correspondence with the GLA has confirmed Newham’s proportion of the LLDC’s London Plan housing target.
- 4.23 The updated housing target in the Draft Submission Local Plan proposes a range housing target, which seeks to deliver a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038. This range target is capacity-derived, based on: approved planning permission figures; design-led capacity testing of site allocations; capacity assumptions from the Greater London Authority’s 2017 Strategic Housing Land Availability Assessment; and capacity assumptions from lapsed application sites. The range target reflects higher and lower capacity assumptions for a number of site allocations, for example, where a site has been design-led capacity tested but also benefits from an extant planning permission.

- 4.24 To inform the Draft Submission Local Plan housing policies, Newham has produced a [Strategic Housing Market Assessment](#). In particular, Newham have sought to optimise housing delivery on Site Allocations, which constitute the majority of our projected housing delivery across the Draft Local Plan period. To do so, Newham have design-led capacity tested site allocations, in line with the methodology set out in the 'Optimising Site Capacity: A Design-led Approach' London Plan guidance.
- 4.25 The full methodology for calculating our housing target is set out in the [Site Allocation and Housing Trajectory Methodology note](#). This methodology note sets out that while Newham have identified sufficient housing capacity to meet our London Plan housing target, the projected phasing of delivery means that Newham will not be able to meet our London Plan housing target within the period of the London Plan. This is primarily as a result of delays to site allocation phasing since the publication of the 2017 Strategic Housing Land Availability Assessment. Newham have also sought to discuss our approach to phasing and capacity assumptions with the GLA, given their strategic role in apportioning housing requirement figures across London through the London Plan.

### **Key discussion points and outcomes**

#### *Issues and Options*

- 4.26 Between October 2019 and April 2021 Newham participated in discussions with other east London planning authorities on whether they wished to work collaboratively to identify housing need across the sub-region. After initial discussions with other east London Boroughs around the option of pursuing a joint Strategic Housing Market Assessment, Newham commissioned Opinion Research Services to undertake a Strategic Housing Market Assessment for Newham. Other boroughs were not in a position to participate in the project as a result of timings with the publication of their own Local Plans and budgetary considerations.
- 4.27 In December 2021, Newham ran two workshops on the content of the Strategic Housing Market Assessment with other boroughs. These stakeholder engagement events were set up to discuss the methodology of LBN's Strategic Housing Market Assessment. These workshops were attended by representatives of Redbridge, Havering, Tower Hamlets, the LLDC and the GLA. No major concerns were raised with the methodology proposed by Opinion Research Services, and individual queries were raised in relation to calculating affordable and specialist housing needs, in the interests of sharing best practice between boroughs.
- 4.28 In 2022, Newham first raised to the GLA through meetings that we anticipated not being able to meet the 2021 London Plan housing target. We also raised broader questions on our proposed policy options in relation to adopting the threshold approach to affordable housing delivery and delivering First Homes as part of affordable housing mix. The GLA provided initial comments on these issues, highlighting that our failure to meet our housing target may cause conformity issue with the London Plan. Newham also further considered the information the GLA provided on both First Homes and the threshold approach, which informed the Draft Local Plan affordable housing policy positions.
- 4.29 In 2022, Newham held meetings with the London Legacy Development Corporation (LLDC) on alignment of the authorities' housing trajectories. As a result, the LLDC have shared a copy of their housing trajectory with Newham, which informed the housing trajectory and target in the Draft Local Plan.

4.30 Prior to the publication of the Issues and Options consultation and Draft Local Plan, Newham also engaged in conversations with neighbouring boroughs. After commenting and holding meetings on different iterations of the London Borough of Barking and Dagenham's Draft Local Plan, Newham entered into Statements of Common Ground on key issues. These concerned the ambitious housing target proposed in Barking and Dagenham's Draft Local Plan, and the potential sub-regional effects of this high target on transport capacity and availability of employment land across our boundaries. At these discussions, Newham also highlighted our significant housing target in the London Plan, and our recent low housing delivery levels. Newham agreed to continue to work collaboratively on the preparation of our respective Local Plans.

4.31 During consultation on the Draft Local Plan, Newham met with representatives of the London Borough of Tower Hamlets, during which both boroughs outlined our respective positions with regards to meeting the housing targets set out in the London Plan.

#### *Draft Local Plan*

4.32 The GLA, the London Borough of Waltham Forest and the LLDC submitted representations on Newham's Draft Local Plan referring to Newham's housing target. In relation to our failure to meet our housing target, the Greater London Authority raised this as a potential general conformity issue. The GLA requested that Newham work together and with associated partners to explore options to help us to meet our London Plan target in a revised version of the draft plan. Waltham Forest felt the target in the plan should be more directly linked with our London Plan target and evidence of housing need.

4.33 Throughout 2023, Newham held multiple meetings with GLA officers on our housing target. During these discussions Newham provided a breakdown of capacity on site allocations in the Draft Local Plan, and how these compared with the capacity assumptions and phasing in the 2017 Strategic Housing Land Availability Assessment. During these discussions, officers from the GLA broadly agreed that only a small proportion of SHLAA capacity had been excluded from our housing requirement figure. Instead, it was considered our issues in meeting our housing target primarily linked to the delayed phasing on a number of Newham's site allocations in our adopted Local Plan, which have been taken forward in the Draft Local Plan. It was suggested that Newham prepare a topic paper on housing delivery that should be published in support of the Draft Submission Local Plan housing target.

4.34 In 2023, Newham responded to a questionnaire from the London Borough of Hackney on cross boundary matters relevant to the preparation of their Strategic Housing Market Assessment. In this response Newham outlined that Newham were unable to meet our London Plan housing target, due to the significant amount of identified housing capacity being delivered in the medium to long term phases of our Local Plan period.

4.35 In 2023, Newham had discussions with the London Boroughs of Greenwich and Waltham Forest around our housing requirement figure, recognising the GLA's suggestion to reach out to neighbouring boroughs undergoing plan preparation to discuss their likely housing trajectories and to seek cross-borough co-operation in achieving the overall housing target as set out in the London Plan. As part of this correspondence Newham enquired as to these boroughs' housing delivery targets and potential for cooperation.

## **Next steps**

- 4.36 Following the conclusion of our Draft Local Plan consultation in early 2023, we have analysed comments and feedback on the site allocations set out within the plan's neighbourhood policies. Newham has used the design-led approach set out in the London Plan to refine capacity assumptions on a number of sites, as well as test new sites highlighted to us through the consultation process. This additional capacity testing has informed our updated housing target.
- 4.37 To support the Draft Submission Local Plan, we have published an updated version of the Site Allocation and Housing Trajectory Methodology note. In this we have set out in detail the methodology used to inform our housing target and the reasons why Newham is unable to meet our London Plan target. Following discussions with the Greater London Authority on this issue, we consider our difficulties in meeting this target stem primarily from delays to the delivery of site allocations since 2017, when the GLA Strategic Housing Land Availability Assessment was undertaken.
- 4.38 We will discuss our housing capacity position further with other London Boroughs, and understand whether any boroughs seeking to deliver updated housing requirements in excess of their London Plan targets would be in a position to assist us with our housing requirement capacity shortfall within the London Plan period.

## **2. Gypsy and Traveller need and site allocations**

### **Background**

- 4.39 As part of our Local Plan evidence base Newham has prepared a Gypsy and Traveller Accommodation Assessment. Newham's latest evidence of Gypsy and Traveller accommodation needs found that there was no need for new pitches for households that meet the Planning Policy for Traveller Sites definition of Gypsies and Travellers. However, the study found a need for 23 pitches for households that did not meet the Planning Policy for Traveller Sites definition.
- 4.40 In December 2023, the Government updated the Planning Policy for Traveller Sites (PPTS). The new guidance has been published in response to the October 2022 Court of Appeal ruling, which found the previous 2015 PPTS to be unlawful in its discrimination against those forced to give up their nomadic lifestyles due to disability or old age.
- 4.41 Currently the Draft Submission Local Plan allocates one site as a safeguarded Gypsy and Traveller accommodation site, which is an existing site containing 15 pitches. The safeguarding of this site does not count towards meeting identified future need, albeit there is scope to extend the site by a few pitches to the south of the allocation.

### **Key discussion points and outcomes**

#### *Issues and Options*

- 4.42 Between October 2019 and April 2021 Newham participated in discussions with other east London planning authorities on whether they wished to work cross-border to identify housing need across the sub-region, including the needs of Gypsies and Travellers. After initial discussions with Redbridge

around the option of undertaking a Gypsy and Traveller Accommodation Needs Assessment as part of a wider a joint Strategic Housing Market Assessment, Newham commissioned Opinion Research Services to undertake a Gypsy and Traveller Accommodation Needs Assessment for Newham. Other boroughs were not in a position to participate in the project as a result of timings with the publication of their own Local Plans, already having up-to-date evidence and budgetary considerations.

4.43 In December 2021, Newham ran two workshops on the content of the Gypsy and Traveller Accommodation Needs Assessment with other boroughs. These stakeholder engagement events were to discuss the methodology of Newham's Gypsy and Traveller Accommodation Needs Assessment, which formed part of a wider project to update Newham's Strategic Housing Market Assessment. These workshops were attended by representatives of Redbridge, Havering, Tower Hamlets, the LLDC and the GLA. No major concerns were raised with the methodology proposed by Opinion Research Services.

4.44 In August 2022, Newham signed a Statement of Common Ground (See [Appendix 2](#)) with the London Borough of Barking and Dagenham in relation to their Draft Local Plan. This Statement of Co-operation set out details of meetings and Local Plan consultations relevant to Gypsy and Traveller pitch provision and the Green Belt. Given Barking and Dagenham were further progressed in the preparation of their plan, and Newham were updating their housing needs evidence, it was not considered Newham was able to accommodate any of Barking and Dagenham's need for Gypsy and Traveller pitches, particularly given our high housing and employment needs.

#### *Draft Local Plan*

4.45 The London Borough of Barking and Dagenham submitted a response to Newham's Draft Local Plan consultation, stating that they would continue to consider any cross-boundary issues that may need to be addressed through a Statement of Common Ground, particularly in light of the recent Smith judgment concerning the definition of Gypsies and Travellers for planning purposes.

4.46 In 2023, Newham met with officers from the London Borough of Islington to discuss their recent examination experience in relation to the Smith judgement, which has subsequently led to the December 2023 update to the Planning Policy for Traveller Sites. Islington officers discussed their experience of trying to secure additional pitches through examination, namely those on private land without supportive landowners.

#### **Next steps**

4.47 Given the recent update to the Planning Policy for Traveller Sites, Newham currently have not identified any safeguarded sites in the Draft Submission Local Plan to meet the accommodation needs of the 23 pitches identified in our Gypsy and Traveller Needs Assessment.

4.48 Given the location of the majority of our site allocations on land susceptible to flood risk, it is unlikely Newham will be able to deliver permanent pitches on identified site allocations in the plan.

4.49 Newham will therefore seek to meet the need for these 23 pitches primarily through Newham Council's Small Sites Options Appraisals and Modular construction programme. In order to do this Newham will work with our colleagues in our Assets department to identify Council-owned land suitable for pitches. Newham are committed to delivering new pitches in the borough, albeit Newham may seek to initiate conversations with neighbouring boroughs if Newham do not identify

sufficient sites to meet our need. Newham will also continue to engage a range of stakeholders, including London Gypsies and Travellers, on this matter, namely the preferred approach to meeting need.

- 4.50 Newham are aware of the emerging evidence base at the regional level on Gypsy and Traveller accommodation needs across London, and will continue to work with the Greater London Authority in the production of this evidence base.

## Employment

| Duty to Cooperate Bodies  |   |
|---|---|
| <b>Prescribed</b>   | The Mayor of London (GLA)   |
| <b>Non-prescribed</b>   | Neighbouring boroughs, LLDC, Port of London Authority (PLA), Royal Docks Team (RDT) |
| Strategic Issues  |   |
| <ol style="list-style-type: none"> <li>1. <b>Employment land availability and demand</b></li> <li>2. <b>Sites for employment use</b></li> </ol> |   |

### 1. Employment land availability and demand

#### Background

- 4.51 To meet Government’s objective to build a strong, responsive and competitive economy, paragraphs 20 and 82 of the National Planning Policy Framework (NPPF) expects strategic policies to set out an overall strategy to make sufficient provision for employment and other commercial development, and requires boroughs to set out clear economic vision, set criteria or identify strategic sites to meet the anticipated needs over the plan period. The London Plan (2021) also sets out in policy GG5 that planning and development are expected to plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.
- 4.52 The London Industrial Land Demand Study (2017) indicates that the East sub-region’s stock of industrial land continue to diminish due to release of vacant industrial land, but it still remains the largest industrial sub-region in London. Newham situated within the East sub-region and the industrial property market area of the Thames Gateway and Lea Valley. Newham is one of the few remaining London boroughs that have a good supply of industrial land, much of it meeting modern occupier requirements and playing an important strategic role servicing the central London market. Newham is a strategically important industrial location for London, with a balance of infrastructure to enable businesses to adequately service the Central Activities Zone with staff able to easily travel by public transport. Therefore, it is necessary to understand employment land demand in Newham, supported by employment evidence including the employment land review, so that strategic policies can be set out to ensure land availability to meet both local and strategic needs.

- 4.53 In July 2022, Newham's Employment Land Review (ELR) was updated to assess the employment land supply and demand in the borough. The ELR demonstrated that Newham needs to take a positive approach to the provision of industrial land for economic growth considering its strategic role as stated above. Meanwhile, office floorspace supply in Stratford and Royal Docks is more than sufficient to meet all the quantitative need and there is no need to identify new office allocations to meet future office need above what is already in the pipeline.

### **Key discussion points and outcomes**

#### *Royal Docks Team*

- 4.54 In May 2022, Newham had a meeting with the Royal Docks Team (RDT) to discuss on the economic strategy for the Royal Docks. The meeting involved a discussion about the discrepancies between the economic ambition of the RDT and the economic approach in the existing and emerging Local Plan. The RDT laid out the latest evidence on sector priority in various development sites to support their economic strategy and Newham agreed to review the information as evidence in the emerging Local Plan and continue future dialogue with the RDT in the Local Plan Review process.

#### *Greater London Authority*

- 4.55 Before the publication of the Draft Local Plan, Newham had a meeting with the Greater London Authority (GLA) in July 2022 to discuss on Newham's recommendation to move away from co-location on industrial land following the initial findings in the Employment Land Review that there are significant needs of industrial land in the borough. The GLA indicated support to this approach. The GLA also gave an update that their Industrial Land Supply Study.
- 4.56 In the same meeting, the GLA provided an update on an evidence gathering research project they were conducting about data centres, as they observed a pattern of increasing demand for data centres, which presents opportunities for digital growth as well as negative environmental impacts associated with data centres. The GLA agreed to set up further meetings to discuss on the strategic needs and approach on data centres and the supply study.
- 4.57 The GLA organised a meeting to discuss with boroughs and industrial providers on the emerging Industry and Logistics London Plan Guidance in June 2023. In the meeting, strategic issues such as strategic data centre needs, deliverability of the strategic industrial needs across London boroughs and the intensification and co-location approach as set out in the London Plan in the Local Plan were being discussed. The GLA set out that the emerging Industrial Land and Uses London Plan Guidance will give more guidance on the intensification and co-location strategy to meet industrial needs. In the meantime, reference can be made to the Industrial Land Supply Study (2020) and the Industrial Demand Study, which will start to be conducted in later 2024.

#### *Comments on Emerging Local Plan of Neighbouring Boroughs*

- 4.58 Newham have closely engaged with the neighbouring boroughs in their Local Plan Review in relation to employment land.
- 4.59 In October 2019, the London Borough of Barking and Dagenham (LBBD) started the Regulation 18 consultation for their Draft Local Plan. LBBD produced the Industrial Land Strategy which set out the



scope to reduce employment land through a managed release strategy. In two rounds of meeting in April 2020 and March 2021, Newham raised concerns about the impact on employment land availability and the potential displacement of existing business to Newham. In response, LBBD agreed to develop localised planning frameworks such as masterplan SPDs which provide more detailed guidance on the approach to industrial intensification and co-location as well as set out a baseline position in relation to industrial land release prior to the development of masterplan SPDs. LBBD also agreed to share findings with neighbouring authorities and the GLA from their new industrial land evidence once it is available. The above agreements were included in the Statement of Common Grounds submitted in LBBD's Regulation 19 Local Plan in September and December 2021.

- 4.60 In July 2023, Royal Borough of Greenwich (RBG) started the initial phase of consultation on their new Local Plan. Newham submitted consultation response through email to suggest consideration of the agent of change principle on the RBG's Strategic Development Locations abutting the river Thames to our Strategic Industrial Locations (SIL) across the river, to ensure existing industries can continue to operate on the SIL. Newham suggested to organise future discussions in our Local Plan Review process on the above issue.

#### **Next steps**

- 4.61 Newham will continue to work with neighbouring boroughs and will respond to through the local the GLA during their consultation on the emerging Industry and Logistics London Plan Guidance to ensure employment land in the borough can meet both local and strategic needs.

## **2. Sites for employment use**

### **Background**

- 4.62 London Plan Policy E4 encourages boroughs to meet identified demand through the provision of new land and/or intensification of existing industrial floorspace as supported by appropriate evidence. It sets out the requirement to meet economic needs by the three categories of London's land and premises for industry, logistics and services, including the Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites. Policy E6 requires boroughs to designate and define Locally Significant Industrial Sites with range of acceptable use, as justified by evidence in local employment land reviews. Boroughs are required to protect and deliver the employment sites following the principle of intensification, co-location and substitution as set out in Policy E7 of the London Plan.
- 4.63 Newham conducted its own Employment Land Review to justify the designation of employment land in the borough. Employment land in Newham is designated as Strategic Industrial Locations which accommodate heavier industrial uses, warehouses and utilities, and Local Industrial Locations to house smaller scale, locally significant industrial areas. Co-location with residential and employment land uses is achieved in specific Local Mixed Use Areas. To review the suitability of the existing employment designations, Newham's Employment Land Review (ELR) was updated in July 2022. The findings in the ELR regarding employment land supply and demand in the borough as well as land audit on each designated employment site are used to inform the changes in the emerging Local Plan.

*Bow Goods Yard*

- 4.64 Fish Island/Marshgate Lane is a safeguarded freight rail head site which straddles Newham and London Borough of Tower Hamlets (LBTH). It is identified in the London Plan (2021) as SIL. The adopted London Legacy Development Corporation (LLDC) Local Plan 2020-2036 recognised the strategic economic importance of the site and designates it as two SILs: Fish Island South (in Tower Hamlets) and Bow Goods Yard East (in Newham). Part of the area straddling the two SILs is a single site allocation (Bow East and West) in the LLDC Local Plan. The eastern part of the site allocation (Bow East) is situated within Newham and the western part (Bow West) is situated within Tower Hamlets. The development principle of this site is set out in the LLDC Local Plan for consolidation and intensification of rail, industrial and other appropriate employment uses and release opportunity for alternative uses.

#### *Safeguarded Wharves*

- 4.65 Since 2000 there has been a network of wharves in London protected by Safeguarding Directions issued by the former Secretary of State for Housing, Communities and Local Government. These Directions require that the Mayor of London is consulted prior to the granting of planning permission on a Safeguarded Wharf and the Mayor of London will keep the network under regular review. According to Policy SI15 of the London Plan (2021), Boroughs should ensure these locations are safeguarded long-term for the purposes of water-borne freight handling. There are currently three safeguarded wharfs in Newham, which are all within the designated SIL boundary.

#### *Land Swap realignment along Bidder Street*

- 4.66 In 2020, the Greater London Authority's Industrial Intensification Delivery Strategies awarded funding for developing a deliverable framework of how industrial can be intensified and consolidated to protect and enhance capacity to meet London Plan Policy E7 while enabling release in parts to accommodate housing delivery. The Canning Town Pilot Area in Newham is one of the six pilot areas under the delivery strategy which is designated as the British Gas/Cody Road Strategic Industrial Land (SIL) and the Bidder Street Local Mixed Use Area (LMUA) in the adopted Local Plan.
- 4.67 To allow the delivery of industrial consolidation, intensification and substitution at the site, our Employment Land Review (2022) suggested that there is an opportunity towards the south of the SIL along Bidder Street which is a cleared site, to be re-designated as a LMUA. This could improve the prospects for intensification and assist with improved place-making linked to the close by Canning Town district centre or station. In turn, new SIL land would be provided through re-designating the northern part of Bidder Street LMUA to SIL to help meet industrial need in the borough and enhance the integrity of the SIL as an industrial location.

#### **Key discussion points and outcomes**

##### *Bow Goods Yard*

- 4.68 Newham has worked with the London Legacy Development Corporation (LLDC) and the London Borough of Tower Hamlets (LBTH) to address issues for Bow Goods Yard.
- 4.69 During the Issues and Options stage, Newham had a meeting with the LLDC and LBTH in July 2022 to discuss on the approach to Bow Goods Yard, in light of the transition of LLDC's planning powers back to the host boroughs. This meeting discussed Newham's evidence for industrial land and it was

agreed in the meeting that Newham would not take forward the mixed-use site allocation at this stage, as this site will be dealt with by employment policies to reflect employment evidence.

- 4.70 During Regulation 18, the LLDC and National Rail both submitted representations to object to the approach in the Draft Local Plan to designate Bow Goods Yard as an employment site, which would not allow for co-location with residential uses. Newham held a meeting with the LLDC and LBTH to discuss the proposed land uses in Bow Goods Yard in August 2023. Newham highlighted our evidence regarding industrial need. LLDC indicated that they had had a range of discussions with National Rail regarding the site and National Rail were considering a range of land uses. LLDC's primary concern was ensuring improved connections into the site. Newham confirmed these would be secured through the neighbourhood policies in the emerging Local Plan. As such we stated that we would continue to designate Bow Goods Yard as an employment site at this stage and continue to engage with LLDC and LBTH during the Local Plan Review.
- 4.71 In March 2023, Newham also submitted comments as part of the early engagement on LBTH's new Local Plan. These comments expressed our aspiration to work together with them on the Bow Goods Yard site allocation.

#### *Safeguarded Wharves*

- 4.72 Newham worked with the Port of London Authority (PLA) on policies related to safeguarded wharfs. The PLA submitted comment in Regulation 18 consultation to make suggestions for better protection of the safeguarded wharfs in Newham emphasising the importance in protection of safeguarded wharves and river freight in our Local Plan. Newham initiated a meeting with them in August 2023 to discuss on the Draft Local Plan and they confirmed that they are happy with the approach in the Regulation 18 Local Plan. This has been carried forward to the Draft Submission Local Plan.

#### *Land Swap realignment along Bidder Street*

- 4.73 Newham worked with the Greater London Authority (GLA) collaboratively to facilitate the delivery of the Industrial Intensification Delivery Strategies with discussions in November 2022 and January 2023 to clarify our long term strategy for delivering the British Gas/ Cody Road SIL and Bidder Street LMUA in Newham's new Local Plan to facilitate the delivery of the Canning Town pilot area. Newham have taken forward the recommendation of the land swap in the Draft Submission Local Plan based on these discussions and also findings from the Employment Land Review (2022).

#### **Next steps**

- 4.74 Newham will continue to work with relevant bodies to ensure the employment use in different locations can meet site specific vision and needs.

## Town Centres

| Duty to Cooperate Bodies                |   |
|---|---|
| <b>Prescribed</b>                       | The Mayor of London (GLA)                           |
| <b>Non-prescribed</b>                   | Neighbouring boroughs, LLDC, Royal Docks Team (RDT) |
| Strategic Issues                        |   |
| <b>1. Newham's Town Centres Network</b> |   |

### 1. Newham's Town Centres Network

#### Background

##### *National and regional requirements*

- 4.75 The National Planning Policy Framework (December 2023) Paragraph 90 sets out the requirements that planning policies must meet in order to protect and promote the vitality and viability of town centres:
- define a network and hierarchy of town centres; and
  - define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations; and
  - allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.
- 4.76 London Plan (2021) Policies SD6 Town centres and high streets and SD7 Town centres: development principles and Development Plan Documents further support the approach outlined by the NPPF and provide London-specific requirements to:
- Set out policies, boundaries and site allocations for future potential town centres, to respond to identified deficiencies in network capacity, having regard to current clarifications and the future potential town centre classifications set out in the London Plan.
  - Identify centres that have particular scope to accommodate new commercial development and higher density housing.
- 4.77 London Plan (2021) Policy SD8 Town centre network sets out the London classification scales for town centres and the approach to managing these through development plans. It states that the classification of International, Metropolitan and Major town centres can only be changed through the London Plan, with potential future changes to the strategic town centre network set out in Annex 1 of the London Plan. Changes to District, Local and neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate. Annex 1

identifies the potential for Stratford to grow to an international classification, and for a new major centre to be created at Beckton Riverside, building on the comparison retail capacity of Gallions Reach Shopping Park.

*The LLDC Local Plan (2020)*

- 4.78 The LLDC Local Plan 2020 sets out the growth vision for the area currently managed by the LLDC, including town centre network designations. It includes the potential extension of Stratford Town Centre to include the East Bank site, as well as a range of established and future Local Centres. A range of site allocations are within the boundary of Stratford Town Centre. The plan does not define any primary shopping areas.

*Royal Docks and Beckton Riverside Opportunity Area Planning Framework (RD+BR OAPF)*

- 4.79 The RD+BR OAPF reflects the strategy for the area as set out in the Local Plan (2018), with new centres to be established at Silvertown, West Silvertown, and Thames Wharf, serving existing and future residents, workers, and visitors. The OAPF recognises the potential for Beckton Riverside to evolve and intensify to become a major town centre with a local and strategic role, focused around a new DLR station.
- 4.80 The RD+BR OAPF spatial strategy promotes the vision for a new local centre at Silvertown, stitching together key development sites at Silvertown, Royal Wharf and Connaught Riverside, and supported by neighbouring assets like City Hall, ExCeL and the docks. The centre will service the existing and new communities and provide amenities for workers and residents. New homes, jobs and public spaces will generate activity in innovative ways, including through activation of the water space and establishing the locally listed Millennium Mills as an accessible local landmark.
- 4.81 The guidance notes that the status of centres across the OA - including the local centre at Silvertown - could be reviewed through the review of the Newham Local Plan.

*Evidence Base – Retail and Leisure Study*

- 4.82 In 2021, Newham commissioned Urban Shape to deliver a new Retail and Leisure Study to support the development of town centre and high streets policies and designations, in line with the national and regional policy requirements.

*Evidence Base – Town Centre Network Review Methodology Paper*

- 4.83 The Newham Town Centres network was reviewed at Regulation 18 stage, in line with the requirements of the NPPF and London Plan (2021), to address gaps in the network in the context of the 15minute neighbourhoods approach and to review the boundaries of existing centre designations where the evidence base indicates the need to do so. The process and methodology were set out in the Town Centre Network Review Methodology Paper 2022, which was published alongside the Draft Local Plan.

**Key discussion points and outcomes**

- 4.84 As part of developing the RD+BR OAPF, Council officers and the GLA discussed the alignment of vision for the town centre network in this opportunity area between the London Plan (2016 and 2021) and Local Plan (2018).

- 4.85 In April 2020, the council and the GLA discussed the role of ‘15 minute neighbourhoods’ concept and how each of the local centres’ catchments overlap and can support the principles of accessible, connected neighbourhoods.
- 4.86 In June 2020, the council and the GLA discussed public transport growth scenarios and how these can support the development of the town centres network in the Opportunity Area, including a new Town Centre at Beckton Riverside. The public transport growth scenarios evidence base has created the forum for feasibility testing public transport enhancement scenarios for Gallions Reach area and how this can unlock the growth potential of the Beckton Riverside site. These options have implications for the potential scale of centre that can be sustainably delivered by the site allocation without entrenching existing car-dependent development patterns. Please see further details under the [Transport](#) and the [Plan Making and Delivery](#) sections of this report.

*Local Plan evidence base development to Regulation 18 policy drafting*

- 4.87 As part of the initiation of the Retail and Leisure Study in 2021, all neighbouring boroughs, plus Havering, were approached via email with a briefing note and a request for information about planned retail and leisure growth in their area. Responses were received from Havering, Tower Hamlets, Redbridge and the LLDC, and a desk-based exercise complemented the data for the other boroughs.
- 4.88 As part of the process to develop the recommendations of the Retail and Leisure Study, targeted engagement events were also held via virtual meetings. In March 2022, the GLA and the LLDC were invited to a workshop (alongside LBN regeneration officers ) to share the findings of the town centre health check undertaken by Urban Shape and to discuss policy objectives regarding the hierarchy of the centres and aspirations for change. The health check highlighted that comparison goods trade draw has shifted significantly towards Stratford, but the Network overall remains stable and well-functioning compared to broader high street trends. It also identified that Canning Town functions well as a district centre and there are no data trends to indicate it will grow towards a major centre and that this growth aspiration present in the Local Plan (2018) is not achievable over the course of the new Newham Local Plan. There were no concerns raised by either of the Duty to Cooperate partners at this meeting.
- 4.89 In March and May 2022, two focused meetings were held with the Royal Docks Team to address emerging data from Newham’s Retail and Leisure Study (2022) and the Royal Dock Team’s Place-making Strategy with regards to the vision for new centres in the Royal Docks area and their potential role and scale. The scale of Silvertown centre was raised as an area of contention between Royal Docks Team’s place-making aspiration for it to become a District town centre and the Council’s emerging evidence of retail growth need not supporting a centre larger than local in scale. Other local centres discussed were Thames Wharf and its relationship to the new City Hall location at Royal Victoria, North Woolwich and its relationship to London City Airport, and the potential for a new local centre designation at Connaught Riverside and its relationship to London City Airport. The emerging strategies of the Council and the Royal Docks Team in relation to these other areas were noted to broadly align and there were no concerns raised.
- 4.90 Over two meetings in June and July 2022 on the emerging RD+BR OAPF, attended by the council, GLA and the Royal Docks Team, the potential scale of the centre at Silvertown was again raised as an issue. As part of these discussions there was no further evidence available from the Royal Docks

Team to support this potential, but officers discussed that further information was due to be provided to the Council through development management processes related to development at Silvertown Quays. Therefore, to allow for flexibility, the finalised OAPF notes that the status of the centres in the OA could be reviewed through the Local Plan Review process.

4.91 The Retail and Leisure Study (2022) was finalised in July 2022 and recommended that the spatial strategy for a new local centre at Silvertown should be retained, with the retail growth need data not supporting a higher tier designation. Recommendations also included the continued promotion of Stratford's growth to an International scale town centre and the retention of the current scale for all other Newham's town centres, as well as a review of local centre designations to address gaps in the 400m catchment of the network.

4.92 Following completion of the Retail and Leisure Study (2022), work began on the review of the town centre network to address the recommendations of the study. In October 2022, the LLDC planning policy team were consulted on the town centre network review methodology and potential implications for Stratford, through a focused meeting. During this meeting officers discussed:

- Bringing together of the boundaries of Stratford town centre under the single Local Plan, and expanding the boundary to include the 'proposed extension' designation of the LLDC Local Plan (2020). This was agreed.
- The vision for better connectivity of the centre over the railway lines, in the context of development management processes for the site allocations in the centre. The principal importance of this was agreed and has informed the development of Neighbourhood policies and site allocations.
- Transforming the approach to primary shopping areas and primary shopping frontages on the LLDC side of the centre to be consistent with the LBN's approach across its network of centres. The extent of the primary shopping Area and primary shopping frontage was discussed and agreed in principle.
- The methodology for designating local centres and primary shopping areas within them. The LLDC agreed with the importance of focusing on Class E, and reflecting the on-the-ground conditions in terms of public realm quality and legibility and footfall patterns. The Council also agreed that the methodology needs to retain a level of flexibility in its criteria, focusing on quality, adaptability and function. This approach has then been adopted across the review of Newham's Town Centres Network, as set out in the Town Centre Network Review Methodology Paper 2022.

#### *Regulation 18 consultation and drafting of Regulation 19 Policies*

4.93 The Royal Docks Team continued to object to the designated scale of Silvertown centre in the Draft Local Plan. However, there has not been any additional evidence submitted to date by the RDT to rebut the council's evidence of retail and leisure need in this part of the borough. Further, a retail impact assessment was submitted by the developer of Silvertown Quays as part of their Regulation 18 consultation response, as well as through development management processes. This has been assessed by the council's retail consultant, which highlighted that the proposed quantum and mix of main town centre uses is unsupported by market trends and likely to lead to significant impacts on

Newham's town centres. The Council has therefore retained the local centre designation, with only minor amendments to the proposed boundary in order to be consistent with the place-making vision set out in the site allocation.

- 4.94 In their response to the Draft Local Plan, the LLDC raised concerns that the Stratford town centre extension (East Bank site) had not been integrated in the boundary. This intention was signalled in the Town Centre Network Review Methodology Paper 2022, and the omission from the Policies Map has been corrected in the Draft Submission Local Plan. They were also concerned that neighbourhood policies did not go far enough in supporting the aspiration for Stratford to become an international centre as highlighted in the London Plan (2021). Newham agreed a change was needed and the development principles of site allocations in Stratford town centre were amended to better support this aspiration of growth in the scale of the centre. Further implementation guidance to support this was also added to Policy HS1.
- 4.95 The LLDC also raised concerns that change in designation of land by the Stratford International DLR station, to include it in the East Village Local Centre boundary, would undermine the function of Stratford Town Centre. Newham did not agree with this assertion. The methodology set out in the Town Centre Network Review Methodology Paper 2022 remains sound. Further, the urban block in question has been fully developed with uses that complement the function of East Village Local Centre and directly border Stratford Town Centre, resulting in no impact on the function of Stratford or its potential for growth over the plan period.
- 4.96 Post Regulation 18 consultation, Newham undertook a further review of planning applications in the LLDC area that propose significant main town centre uses floorspace. Emerging development at Sugar House Island and proposed development at Carpenters estate were the key areas identified as requiring further consideration for potential designation. A further meeting with LLDC planning policy team took place in September 2023 to discuss these sites, and it was agreed to designate a Local Centre at Sugar House Lane and a future Neighbourhood Parade at Gibbins Road on the Carpenters estate.

#### **Next steps**

- 4.97 Ongoing discussions are taking place with LLDC as part of transition to ensure integration of Stratford Town Centre into the single planning framework of the new Local Plan, and that development management processes continue to support the aspiration to delivering the new local centres and neighbourhood parade.
- 4.98 Ongoing discussions are taking place with the GLA and Royal Docks Team about the aspirations for centres within the Royal Docks and Beckton Riverside Opportunity Area, through the formal Local Plan consultation processes, and through the development management process related to the sites expected to deliver or expand the network of centres in the Royal Docks.



## Transport

| Duty to Cooperate Bodies   |  |
|--|--|
| <b>Prescribed</b>  | The Mayor of London (GLA), Transport for London (TfL), Homes England |
| <b>Non-prescribed</b>  | Neighbouring boroughs, LLDC  |
| Strategic Issues   |  |
| <ol style="list-style-type: none"> <li>1. <b>Beckton Riverside capacity and DLR extension</b></li> <li>2. <b>Stratford Station</b></li> <li>3. <b>Connections along and over the Lea and Roding</b></li> <li>4. <b>Sustainable transport strategy</b></li> </ol> |  |

### 1. Beckton Riverside capacity and DLR extension

#### Background

- 4.99 An extension of the Docklands Light Railway (DLR) to Thamesmead and Beckton Riverside has been proposed since the late 2010s, to serve development sites on both sides of the river, namely Beckton Riverside in Newham and Thamesmead in RB Greenwich. The project replaces a previous proposal to extend the DLR to Dagenham Dock via Beckton Riverside, which was cancelled in the early 2010s.
- 4.100 Development sites on both sides of the river currently have low levels of public transport accessibility, and an extension of the DLR was considered the best way to improve this. The extension would also deliver an additional crossing of the River Thames in east London.
- 4.101 For Newham, the delivery of the DLR extension is considered vital to unlock the largest site allocation in the Local Plan as well as enable the creation of a new town centre to replace an out of centre retail park.
- 4.102 In December 2019, a DLR extension to Thamesmead was formally proposed by Transport for London as part of the draft Thamesmead and Abbey Wood OAPF. The Royal Docks and Beckton Riverside OAPF (2023) continued to highlight the important role of this DLR extension, with one of the key objectives of the OAPF to outline the opportunities associated with a future DLR extension to Beckton Riverside and how these could be supported. A public consultation, led by TfL, regarding the extension of the DLR took place in early 2024.

#### Key discussion points and outcomes

- 4.103 Throughout the development of the Royal Docks and Beckton Riverside OAPF, Newham has attended meetings with stakeholders related to the project, including TfL, Greater London Authority, local boroughs (Greenwich and Bexley) and developers (Abrdn, St William and Peabody).
- 4.104 Alongside the development of the Royal Docks and Beckton Riverside OAPF and on an ongoing basis, Newham participates in the Thamesmead & Beckton Riverside Steering Group which meets monthly

to discuss and progress the project. The steering group is convened by TfL and has representatives from TfL, Greater London Authority, local boroughs (Greenwich and Bexley) and developers (Abrdn, St William and Peabody). Technical work on the DLR extension to Thamesmead via Beckton Riverside to date, including assessing a variety of line alignments and station locations, has been further developed with support from these stakeholders, as well as the GLA, Homes England and the Department of Levelling Up, Housing and Communities (DLUHC).

4.105 Newham is supportive of the delivery of the DLR extension. In May 2023, Cabinet approved the submission of the Strategic Outline Case for the Thamesmead and Beckton Riverside Public Transport Programme to Government by Transport for London on behalf of the Programme partners and approved £500k contributions to the programme over the next 4 years, as part of an overall funding package of £10-12m by Government and other stakeholders, in order to enable further feasibility work for public transport interventions and develop a comprehensive business case and consents programme.

4.106 In June 2023, the Strategic Outline Business Case for the extension was submitted to HM Government. It noted that a DLR extension to Thamesmead could allow between 25,000 and 30,000 homes to be constructed. Three options would be considered in the next stage:

- Bus rapid transit between Woolwich and Abbey Wood, around 6 kilometres (3.7 mi) in length
- DLR extension to a new station at Beckton Riverside, around 1 kilometre (0.62 mi) in length
- DLR extension with stations at Beckton Riverside and Thamesmead, a tunnel underneath the River Thames, around 3 kilometres (1.9 mi) in length

4.107 The business case noted that a DLR extension to Thamesmead could cost between £700 million to £1.2 billion, and could be completed in the 2030s. The next step would be seeking government funding to develop the scheme further, with a full business case submitted in 2025.

4.108 Support for the DLR extension is embedded in the Submission Draft Local Plan, including the vision, transport and high street policies and the relevant neighbourhood policy and Beckton Riverside site allocation. Full realisation of the Beckton Riverside Site Allocation is contingent of the delivery of the DLR or a similarly transformative transport intervention.

### **Next steps**

4.109 LB Newham will continue to work with TfL, the GLA, Homes England, LB Greenwich and relevant developers to progress the business case and delivery of the DLR.

## **2. Stratford Station**

### **Background**

4.110 Stratford Station, along with Stratford's two bus stations, form a key strategic public transport interchange for east London. It has become the fifth busiest station on the entire National Rail network, the sixth busiest station on TfL's network, and is also the busiest bus station in London. Since 2001, Stratford Station has seen the largest absolute amount of passenger growth of any station in the UK.

4.111 The station was not designed to accommodate the volume of passengers now using it and this has resulted in unacceptable levels of overcrowding, regular station closures and poor passenger experience. The station faces a number of issues:

- limited capacity resulting in overcrowding and delays, both on platforms and when entering and exiting the station;
- legibility and quality of facilities;
- severance caused by the rail lines and the station itself; and
- the constrained interchange with other modes, particularly buses.

4.112 In 2019, the London Legacy Development Corporation (LLDC), Newham, Network Rail and Transport for London (TfL) started to prepare a Strategic Outline Business Case (SOBC) for the long-term redevelopment of the station and the surrounding area to address capacity and connectivity issues. As part of the work on the SOBC, the LLDC commissioned an Urban Design Framework (UDF) for Stratford Station and the surrounding area to develop a vision for how the Stratford Station could be redeveloped to address the capacity and connectivity issues and how these improvements to the station could unlock other sites for development. Public consultation took place on the UDF in 2022.

#### **Key discussion points and outcomes**

##### *Call for Sites*

4.113 The LLDC submitted a Call for Sites submission in December 2021, which stated it may be prudent to consider a Stratford Station site allocation to promote the approach to be agreed through the joint-working between LLDC, Newham, TfL and Network Rail. As a result, the site was added to the long list of sites to be considered as part of the site allocation selection process set out in the Site Allocation and Housing Trajectory Methodology Note.

4.114 In early 2022 Newham planning officers regularly engaged with LLDC and the Stratford Station project team on the work being undertaken UDF and SOBC to ensure alignment with the emerging Local Plan evidence and future policies. This included meetings in March and April 2022 where the potential misalignment between the quantum of development of being explored at the station was identified. Further discussions were held in July 2022 to discuss a potential boundary for the site allocation and to better understand the quantum of development envisaged. These discussions identified issues with the boundary being explored as part of the UDF and its relationship with the planning application for the Carpenters estate and the lack of evidence behind the quantum and type of uses being proposed. However, the work on the infrastructure requirements and site options being looked at as part of the UDF and the SOBC fed into the capacity testing undertaken by Maccreanor Lavington as part of the site assessment process for new site allocations.

4.115 A meeting took place in October 2022 with LLDC planning policy team and a member of the Stratford Station project team to provide an update on the site allocations in the LLDC area to be included in the Draft Local Plan. Further discussions took place with the Stratford Station project team following this meeting on the detail of the site allocation, with particular issues raised around heights, town centre uses and industrial uses. As part of these discussions we maintained our position of wanting to work collaboratively to enable improvements to station whilst ensuring the approach was consistent with the emerging Local Plan policies and the approach taken on other sites.

### *Draft Local Plan*

- 4.116 The Draft Local Plan included a site allocation the Stratford Station site, which set out infrastructure requirements and development and design principles for different plots. The LLDC response to the Draft Local Plan raised a number of issues with both the site allocation and the neighbourhood policy for Stratford and Maryland, particularly in relation to height, the mix of uses and the site allocation map. The representation concluded that the Local Plan did not match the UDF and SOBC.
- 4.117 Comments on the final draft of the UDF were provided to the Stratford Station project team in January 2023. These comments continued to raise issue with how development at the station was represented in 3D diagrams, the proposed heights and the lack of evidence to support the quantum of uses and alignment with the Draft Local Plan policies.
- 4.118 A meeting was held with the LLDC planning policy team in August 2023 to get further detail on their comments in their representation. Following this, further discussions took place with the Stratford Station project team throughout August 2023 to discuss the issues raised on the site. A follow-up meeting took place in October 2023 and it was agreed to change the approach to industrial uses on one part of the site and to look at the wording of the site allocation to make sure it enabled the infrastructure requirements on the site. The map in the site allocation has also been amended and simplified in light of the comments provided. Further engagement took place in January 2024 to finalise the wording of some elements of the site allocation.

### **Next steps**

- 4.119 The Strategic Outline Businesses Case was submitted to the Government in July 2023. Further work is being undertaken to develop this work and Newham will continue to work with the LLDC to support this work and to ensure the Local Plan can support the delivery of necessary station infrastructure.

## **3. Connections along and over the Lea and Roding**

### **Background**

- 4.120 Newham is bordered on three sides by rivers – the River Lea to the west, the River Thames to the south and the River Roding to the east.
- 4.121 There is currently no way to cross the River Lea between the A13 at Canning Town and Twelvetrees at Bromley-by Bow. Seven pedestrian and cycle bridges have been proposed to better connect Tower Hamlets to Newham. Three bridges (Lochnagar, Poplar Reach and Mayer Parry) have been progressed as a priority, as development sites in Tower Hamlets will gain better public access to town centres and public transport in Newham. Newham residents will gain better access across the river, better connecting them to Tower Hamlets.
- 4.122 There are also only three road crossings of the River Roding on the west of the borough. Local residents and political stakeholders have proposed improving a north-south walking/route along the River Roding, as well as building pedestrian crossings of the River Roding. LB Barking and Dagenham also propose a new vehicular bridge to cross the River Roding in the south of the borough – the Lower Roding Crossing.

### **Key discussion points and outcomes**

- 4.123 As part of the development of the LB Tower Hamlets Leaside Area Action Plan, Newham expressed support for additional crossings of the Lea. Newham's Regeneration team has also worked closely with LB Tower Hamlets, to progress delivery of the bridges and successfully bid for funding. Nearly £40 million in Levelling Up funding was awarded to Newham in 2022, funding the three priority Lower Lea bridges.
- 4.124 Newham met with River Roding Trust campaigners in April 2021 to discuss their proposals, with improved walking and cycling routes along the River Roding corridor included in both the Sustainable Transport Strategy and the Local Plan. Newham also discussed the Lower Roding Crossing with LB Barking and Dagenham in February 2024, feeding it into the development of the Sustainable Transport Strategy.
- 4.125 The various crossings have been referenced in the relevant transport and neighbourhood policies, as well as the site allocations as appropriate.

### **Next steps**

- 4.126 Delivery of the priority Lea bridges began in the early 2020s starting with the Lochnagar Bridge and all three bridges are expected to be open for public use by 2025. Newham will continue to work with Tower Hamlets on other bridge proposals.
- 4.127 Crossings of the River Roding have been considered in the Sustainable Transport Strategy, and LB Barking and Dagenham are currently working on a feasibility study for the Lower Roding Crossing. The various crossings have been referenced in the relevant transport and neighbourhood policies, as well as the site allocations as appropriate.

## **4. Sustainable Transport Strategy**

### **Background**

- 4.128 As part of the development of the Local Plan, SYSTRA were commissioned by the Planning Policy and Highways and Sustainable Transport teams to produce the Sustainable Transport Strategy. This piece of evidence base has informed the refresh of the Local Plan, as well as assisting the Highways and Sustainable Transport team in identifying and delivering interventions to improve sustainable transport throughout the borough. It has also allowed us to understand and resolve transport issues raised by stakeholders including TfL.
- 4.129 As part of the development of the Strategy, SYSTRA and Newham identified five objectives of the Strategy:
- Enable sustainable housing and employment growth
  - Improve health outcomes for residents and visitors
  - Deliver improvements to the transport network that will help tackle the climate emergency
  - Ensure that Newham has an inclusive transport network

- Support measures to deliver a 15-minute network across the borough and improve access to and from the rest of London

4.130 These objectives were used by SYSTRA to guide the selection of interventions and actions included in the final Strategy document.

#### **Key discussion points and outcomes**

4.131 As part of the development of the Sustainable Transport Strategy, the team specifically engaged with local boroughs as well as Transport for London during the wider public consultation period. This helped to guide the strategy to ensure that all relevant aspects desired by stakeholders were included.

4.132 As well as workshops with local residents, local businesses and young people (held in spring and summer 2023), stakeholder workshops were also held with Newham colleagues and TfL in summer 2023 to present the draft recommendations of the Strategy.

4.133 A consultation on the draft Sustainable Transport Strategy took place in March 2024, and responses were received from the Environment Agency, London City Airport, National Highways, Places for London, TfL, Thames Water and University of East London. Newham considered the responses of stakeholders when amending the Strategy, amending the Local Plan if deemed appropriate.

4.134 During the development of the strategy, SYSTRA considered a wide range of points and proposals from Newham, TfL and other stakeholders regarding transport infrastructure upgrades required. This included comments made by TfL made on Local Plan sites (and elsewhere in the plan) as part of the Regulation 18 consultation.

4.135 Strategic issues considered by SYSTRA as part of the development of the Strategy include cross boundary connections (such as crossings of the River Lea, Roding and Thames, as well as new and improved bus routes), improvements to regional transport (such as London Underground services) and last-mile deliveries and servicing (which often serves locations outside of Newham).

4.136 TfL indicated in their responses to the Local Plan and Sustainable Transport Strategy consultations that they had limited funds to invest in transport and long-term commitments could not be made given funding constraints. TfL noted that other sources of funding would have to be sought to deliver projects, and active travel schemes may have to be prioritised to deliver modal share. The Sustainable Transport Strategy therefore indicates potential or indicative funding sources for transport projects, including developers, neighbouring local authorities, national government or TfL. The Sustainable Transport Strategy also indicates a wide range of active travel schemes across the borough, linked to site allocations and neighbourhoods.

4.137 In TfL's response to the Local Plan Issues and Options consultation, TfL noted that parking exceptions contrary to London Plan policy would not be supported, and that an evidence based, case by case approach to parking exemptions should be taken. Following this, the transport policy makes clear that parking for industrial and commercial uses is only permitted where it is justified to be operationally required, following the evidence of the Sustainable Transport Strategy.

4.138 The final Sustainable Transport Strategy sets out a blueprint for delivering improvements in Newham between now and 2038. Some actions are short term, and reflect schemes already in development,

whereas others will need to be implemented over the longer term, and may require support from developers, neighbouring local authorities, national government or Transport for London (TfL). Some interventions were identified as necessary to accompany the delivery of allocations identified in the Local Plan, with these fed into the site allocations and neighbourhood policies.

**Next steps**

- 4.139 The final Sustainable Transport Strategy has been published alongside the Local Plan Regulation 19 document, following the amendments made after consultation on the strategy in March 2024.
- 4.140 Newham will continue to work with TfL and other stakeholders on delivering the various elements of the strategy in future.

**Telecommunications Infrastructure**

| Duty to Cooperate Bodies                                |                  |
|---|------------------|
| <b>Prescribed</b>                                       | Royal Docks Team |
| <b>Non-prescribed</b>                                   | Hyperoptic       |
| Strategic Issues  |                  |
| <b>1. Rollout of high speed internet in East London</b> |                  |

**1. Rollout of high speed internet in East London**

**Background**

- 4.141 In London, the digital revolution needs fast, reliable and universal broadband connectivity. London First’s ‘a roadmap to 5G’ report (2018) highlights Local Authorities’ role in supporting improved access to mobile connectivity in London.
- 4.142 Chapter 1 of the London Plan (2021) sets out the “good growth” principle for planning for a ‘smarter’ city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners. London Plan Policy SI6 of also required boroughs to support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.
- 4.143 According to GLA mapping, much of Royal Docks has sub-optimal broadband speeds so significant upgrades will be required to bring it to superfast standards; BT and Virgin are currently in the process of rolling out superfast broadband in Newham. The Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) (2023) recognised the need to expand the existing digital capability with additional demand from new developments in the Royal Docks, through enabling investment in the fibre broadband and mobile networks.

**Key discussion points and outcomes**

- 4.144 As part of the development of Newham’s Infrastructure Delivery Plan in 2021, discussions with telecommunication providers were initiated to understand plans for the rollout of high speed internet and 5G mobile signal.
- 4.145 A discussion in April 2021 with Hyperoptic involved discussing the growth of high speed internet in Newham, noting that the majority of work to install high speed internet does not require planning permission. Detailed information regarding areas of the borough to be connected to high speed internet by Hyperoptic was not shared due to commercial confidentiality.
- 4.146 To prepare for the Infrastructure Delivery Plan for the Submission Draft Local Plan, Newham met with the Royal Docks Team in March 2024 and followed up with emails to obtain the most up to date telecommunication infrastructure projects in the Royal Docks. The RDT provided an update on the delivery status of the list of projects and these have been reflect in the updated Infrastructure Delivery Plan.

**Next steps**

- 4.147 Newham will continue to work with telecommunication providers to improve digital connectivity in Newham.

## Water Supply and Waste Water Supply

| Duty to Cooperate Bodies  |                           |
|---|---------------------------|
| <b>Prescribed</b>   | The Mayor of London (GLA) |
| <b>Non-prescribed</b>   | Thames Water              |
| Strategic Issues  |                           |
| <ol style="list-style-type: none"> <li>1. Thames Water assets</li> <li>2. Beckton Sewage works odour</li> </ol> |                           |

### 1. Thames Water assets

**Background**

- 4.148 Policy SI5 of the London Plan (2021) set out the requirement for Boroughs to promote improvements to water supply infrastructure to contribute to security of supply and ensure that adequate wastewater infrastructure capacity is provided, and take action to minimise the potential for misconnections between foul and surface water networks.
- 4.149 Thames Water is responsible for maintaining and upgrading water supply and waste water infrastructure in Newham, as well as planning for the long term capacity. Development-related requirements are established through engagement between Newham and Thames Water during the Local Plan Review and planning control process.



### **Key discussion points and outcomes**

- 4.150 During the Regulation 18 consultation, Thames Water submitted comments regarding water supply and waste water assets and capacity. Newham initiated a discussion with them in August 2023 to understand the implications on site allocations and agreed to update the site allocations to identify the existing assets at the site and reiterate the requirement for early consultation with Thames Water for relevant site allocations.
- 4.151 In addition, as part of preparing the Infrastructure Delivery Plan, Newham contacted Thames Water via email, in March 2024, to request the most up to date information about water and waste water infrastructure projects in the borough. Thames Water provided their comment in April 2024, which did not have implications for the Local Plan but have been reflected in the Infrastructure Delivery Plan.

### **Next steps**

- 4.152 Newham will continue to consult Thames Water on the Local Plan to ensure the policy requirements protect and provide water supply and waste water infrastructure that can meet current and future needs.
- 4.153 The updated Infrastructure Delivery Plan has been published with the Submission Draft Local Plan and will be reviewed regularly with continuous engagement with Thames Water to reflect the latest infrastructure projects.

## **2. Beckton Sewage works odour**

### **Background**

- 4.154 Beckton is home to London (and Europe's) largest sewage processing plant: Beckton Sewage Treatment works. It is located within the Beckton Riverside Strategic Industrial Location and is adjacent to the Beckton Riverside site allocation (N1.SA1), the largest site allocation in the submission Local Plan.
- 4.155 The site was first allocated in the 2018 Newham Local Plan and is also part of the London Plan (2021) designated Royal Docks and Beckton Opportunity Area and is subject to additional guidance in the Royal Docks and Beckton Opportunity Area Planning Framework (2023). A DLR extension is planned to connect the site which is subject to a current funding bid to Homes England.
- 4.156 Planning activity has started on the southern portion of the site allocation, through pre-application discussions with St William. This has triggered the requirement for masterplanning activity to take place for the whole of the site allocation (as under the adopted Newham Local Plan).
- 4.157 Planning Policy Guidance confirms that the Agent of Change principle is relevant for sewage works as: "Plan-making may need to consider: whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)" Paragraph: 005 Reference ID: 34-005-20140306. The Agent of Change principle is outlined in the NPPF 2023 (paragraphs 180, 191 and 193 and London Plan policy D13. This outlines that the

successful integration of new development with existing uses, is the responsibility of the applicant, who must ensure that suitable mitigation is in place before the development is completed.

### **Key discussion points and outcomes**

#### *Thames Water Representations on the Local Plan*

- 4.158 Thames Water submitted a representation to the Issues and Options Consultation highlighting the need for an odour impact assessment to take place for any development proposed with 800m of the sewage works. This would be to determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works. Thames Water submitted a further representation to the Draft Local Plan Consultation which repeated the comments made in response to the Issues and Options consultation, however the covering email also highlighted a specific holding objection to allocation N1.SA1 due to its proximity to Beckton Sewage Treatment Works.
- 4.159 To prepare for the Infrastructure Delivery Plan under the Regulation 19 Local Plan, Newham contacted the Thames Water via email, in March 2024, to request for the most up to date information about water and waste water infrastructure projects in the borough. In Thames Water's response, they suggested to highlight the odour work at Sewage Treatment Work in the Infrastructure Delivery Plan, but we responded that it would be dealt with in the Local Plan.

#### *Opportunity Area Planning Framework development and planning application process*

- 4.160 Due to the timing of both the development of the Opportunity Area Planning Framework and planning application process, which ran alongside the development of the Local Plan, further discussions have taken place throughout 2022 and 2023 with LBN planners, environmental health and regeneration colleagues, the GLA, Thames Water and the applicants regarding the potential odour impact and need for an odour impact assessment.
- 4.161 Further information was shared by Thames Water indicating that they consider the odour impact from the sewage treatment works to have changed from their position in 2018 (which informed the adopted Newham Local Plan and showed a very small impact) and their current position, which indicates a much larger odour zone.
- 4.162 St William agreed to fund a further independent odour impact and mitigation study. LBN, Thames Water and St William agreed the brief and WSP was appointed to undertake the work in 2022. Further information was shared by Thames Water to inform the study.
- 4.163 A draft of the study was shared in January 2024 which indicated that the odour zone would have some impact at the northern portion of the site, but was not as extensive as had been suggested by Thames Water.
- 4.164 A discussion on the interim Odour Report with landowners, the GLA, Transport for London and Homes England was held in May 2024. It was agreed that external verification of the report was required and that Thames Water's view was required.

### **Next steps**

- 4.165 Further refinement of the odour modelling and resulting impact and mitigation study are taking place. This will then be shared with Thames Water for their review.
- 4.166 We will continue to work with development partners, Thames Water, as well as the GLA, Hones England and TfL to consider the implications of the study for the site allocation, application and DLR delivery and funding case.

## Flood Risk and Water Sustainability

| Duty to Cooperate Bodies  |  |
|---|--|
| <b>Prescribed</b>   | The Mayor of London (GLA), the Environment Agency, Natural England |
| <b>Non-prescribed</b>   | Neighbouring boroughs, Thames Water                                |
| Strategic Issues  |  |
| <ol style="list-style-type: none"> <li>1. <b>Sub-regional Integrated Water Management Strategy</b></li> <li>2. <b>Riverside Strategy</b></li> </ol> |  |

### 1. Sub-regional Integrated Water Management Strategy

#### Background

- 4.167 Paragraphs 166 and 180 of the NPPF (2023) set out that strategic policies should be informed by flood risk and should contribute to and enhance the natural environment and where possible improve water quality.
- 4.168 Policy SI 5 Water infrastructure in the London Plan 2021 states that ‘Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage’.
- 4.169 In 2022, following the significant flooding events in summer 2021, the GLA convened a pilot Sub-regional Integrated Water Management Strategy (SIWMS) for East London and invited Newham as well as 7 other local authorities connected by the Lea Valley drainage area (London boroughs of Enfield, Hackney, Haringey, Waltham Forest and Tower Hamlets), Thames Water, Natural England and the Environment Agency (EA) to participate.
- 4.170 The key objectives of the Strategy are to provide:
- An understanding of water related risks in the sub-region under different growth and climate change scenarios.
  - Interventions and measures needed to ensure sustainable growth in response to identified risks.

- Clarity on the delivery levers and mechanisms to implement identified interventions and measures.
- Adaptive capacity, enabling the strategy to change course under changing circumstances.

#### **Key discussion points and outcomes**

- 4.171 Work commenced in summer 2022 to agree the terms of reference and procurement brief. The GLA undertook the procurement and appointed Mott MacDonald to develop the SIWMS.
- 4.172 Newham, alongside other councils, fed into the development process of the study, including providing details of our projected housing delivery and reviewed the emerging findings and recommendations. As the development of Newham's Strategic Flood Risk Assessment was taking place over the same timeframe, the SIWMS findings and recommendations were shared with the consultants undertaking the SFRA, with feedback provided and responded to by each team, with relevant findings incorporated into each document. The study was completed and published in Summer 2023.
- 4.173 A key element of feedback provided during the process was to request that the GLA reflected the resourcing constraints faced by Councils, both as planning and lead local flood authorities, and allocated deliverable actions. Following these discussions, the GLA has committed to leading a significant number of actions and managing the ongoing coordination required to deliver the Strategy.
- 4.174 A further discussion was held regarding the role the Local Plan could play in supporting the delivery of the recommendations. One area it was agreed that the Local Plan was a key delivery mechanism, but that required further detailed work to support a new policy direction, was a policy to increase water efficiency targets to ensure new developments achieve a lower per day water consumption rate.
- 4.175 Following its publication the GLA established a delivery process to support partners to deliver and monitor the SIWMS delivery and has commissioned a further study on ways to reduce water demand in new developments. Newham fed into and agreed the brief for this work.

#### **Next steps**

- 4.176 We will continue to engage in the delivery group discussions and actions. In particular, Newham will work collaboratively on the further work to develop an evidence base on ways to reduce water demand in new developments. Depending on the timing of the work, this could be incorporated into further guidance on the implementation of the Local Plan.

## **2. Riverside Strategy**

### **Background**

- 4.177 The NPPF requires Local Plans to be informed by an understanding of flood risk as well as to ensure that development improves local environmental conditions. Policy SI 5 Water infrastructure in the London Plan 2021 states that 'Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan.' The Plan goes on to state that the concept of Local Authorities producing Riverside Strategies was introduced through the TE2100 Plan

to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment.

- 4.178 Newham is a key riverside borough, with three rivers forming three of the borough's boundaries: the Thames, Roding and Lee/a. Reflecting this geography, a large part of the borough sits within the 'Royal Docks Policy Unit' within the TE2100 Plan. The London Boroughs of Barking and Dagenham, Redbridge and Waltham Forest also have small parts within the Unit boundary. It extends along the north bank of the Thames from Blackwall to the Barking Barrier. It includes areas of Stratford, West Ham, East Ham, the Royal Docks and London City Airport. The Unit notes that there is currently no riverside strategy for this area and that by 2030, councils should work with communities to plan how their riverside will look in future.

#### **Key discussion points and outcomes**

- 4.179 In 2019, during the development of the Royal Docks and Beckton Opportunity Planning Framework, discussions commenced on developing a Riverside Strategy, meeting the requirements and approach set out in the TE2100, to support the delivery of the OAPF.
- 4.180 Discussions included the GLA (Royal Docks Team), Environment Agency and Newham colleagues. The Royal Docks Team agreed to lead the work with the Environment Agency (EA) providing additional support.
- 4.181 Newham colleagues agreed that they could support the work, but there was insufficient resource in the planning team and Lead Local Flood Authority to lead on the development of the strategy.
- 4.182 In March 2021, further discussions were held between Newham and the EA to confirm the future status of any emerging Riverside Strategy and it was agreed that it would be used to inform the emerging Local Plan and could also be referenced as supplementary guidance for relevant developments.
- 4.183 In October 2022, it was confirmed by email from the EA and Royal Docks Team that they had insufficient resources to develop the Riverside Strategy. They suggested Newham could lead on its production but due to resource and capacity constraints it was not possible to lead on this alongside the Local Plan refresh.
- 4.184 In November 2023, Newham was approached by the Thames Estuary Partnership to support the collaborative review of the existing Joint Thames Strategies, which was last produced in 2008. It was proposed that this approach could be used to fulfil the requirement to develop a Riverside Strategy. We have agreed to support this approach and associated funding request to the Thames Regional Flood and Coastal Committee. Newham attended a consultation event on the update of the Joint Thames Strategies in April 2024.

#### **Next steps**

- 4.185 Newham will continue to support initiatives to develop a Riverside Strategy and will consider, depending on the timing of the work, how any recommendations could be incorporated into implementation guidance for the new Local Plan or subsequent delivery guidance.

## Waste Management

| Duty to Cooperate Bodies                            |   |
|---|---|
| <b>Prescribed</b>                                   | The Mayor of London (GLA)   |
| <b>Non-prescribed</b>                               | Neighbouring boroughs, County Councils outside of London where we have waste flows. |
| Strategic Issues                                    |   |
| <b>1. Updating the East London Joint Waste Plan</b> |   |

### 1. Updating the East London Joint Waste Plan

#### Background

- 4.186 Policy SI 8 of the London Plan sets the strategic target for the equivalent of 100 per cent of London's waste to be managed within London's border by 2026, otherwise known as 'net self-sufficiency'.
- 4.187 In order to help achieve net self-sufficiency, the London Plan, under policy SI 8 (Waste capacity and net waste self-sufficiency) requires boroughs to demonstrate how their Local Plans will meet assigned waste apportionment targets. Newham's waste apportionment target is as follows: 383,000 tonnes of household, commercial and industrial waste management capacity by 2021 and 407,000 tonnes by 2041.
- 4.188 The existing East London Joint Waste Plan, which was adopted in early 2012, expired in 2021. The plan was drafted within a notably different planning framework context: before the National Planning Policy Framework was introduced, before the current National Planning Policy for Waste, and under earlier iterations of the London Plan. Newham and the east London boroughs (Havering, Redbridge and Barking and Dagenham), therefore, need to update the Joint Waste Plan in order to demonstrate our ability to meet the London Plan apportionment targets and deliver sufficient capacity to manage other identified waste streams.

#### Key discussion points and outcomes

- 4.189 It should be noted that detailed consideration of waste movements between different boroughs will be fully considered through the update to the Joint Waste Plan. This discussion of meetings below primarily relates to progress on the update to the Joint Waste Plan, and how it relates to the update of the Local Plan (for example, potential conflicts between the principles of safeguarding waste uses, and long term aspirations to release waste sites to optimise the redevelopment potential of site allocations).

#### Issues and Options

- 4.190 Since 2020, Newham have held regular meetings with the London Boroughs of Barking and Dagenham, Havering and Redbridge on updating the adopted 2012 East London Joint Waste Plan. In 2021 Newham collectively commissioned Anthesis to provide an updated evidence base to support the preparation of the East London Joint Waste Plan. This was followed up in 2022 with a supplementary piece of work which sought to correct errors in calculating capacity for the sub-region.

As part of our joint working arrangement, in October 2022 Newham emailed a list of those site which fall within site allocations within our adopted and emerging Local Plans to the other East London boroughs, to provide an indication of those sites Newham may wish to release through the update to the Joint Waste Plan.

- 4.191 In 2022 the east London boroughs [published the evidence base](#), which had been prepared to support the refresh of the east London Joint Waste Plan. This evidence base showed that there was sufficient waste management capacity in East London to meet the London Plan apportionment targets for Local Authority Collected Waste and Commercial and Industrial waste streams and to manage the equivalent of 100 per cent of Construction & Demolition waste arising over the next fifteen years. The findings of this evidence base informed the draft policies in the Draft Local Plan.
- 4.192 Prior to the publication of the Draft Local Plan, Newham attended meetings hosted by the London Borough of Barking and Dagenham to discuss the refresh of their Local Plan. In Statements of Common Ground agreed in 2021, Newham agreed that updates to Barking and Dagenham’s Local Plan waste policies should be more closely linked to the update of the East London Joint Waste Plan.
- 4.193 Between 2022 and December 2022, Newham responded to Duty Cooperate requests for information from Hampshire County Council, the London Borough of Wandsworth, the City of London, Hertfordshire County Council and the Royal Borough of Kensington and Chelsea. In these responses, Newham’s highlighted the current status of identified sites in Newham that manage waste from other areas, whether they were likely to continue operations and provided an update as to the progress of the East London Joint Waste Plan refresh.
- 4.194 In 2022, Newham also met with Officers from the GLA to discuss next steps with regards to the preparation of the Joint Waste Plan. The GLA indicated that they were not supportive of the east London boroughs allocating waste sites through updates to our respective Local Plans. Instead, they advised east London to work collaboratively to produce an up-to-date Joint Waste Plan.

#### *Draft Local Plan*

- 4.195 Following the publication of the Joint Waste Plan evidence base, Newham has continued to meet with the other East London boroughs working on the update of the Joint Waste Plan.
- 4.196 In 2023, Newham along with the other east London boroughs appointed a consultant to update the Joint Waste Plan, with a view to undertaking a Regulation 18 consultation in mid-2024. The participating boroughs have also agreed and sealed an inter authority agreement, which sets the parameters for joint working amongst Newham on the project. As part of the update of the east London Joint Waste Plan, Newham intend to contact any relevant authorities on any Duty to Cooperate matters arising from the update of the Joint Waste Plan.
- 4.197 In 2023, Newham responded to Duty Cooperate requests for information from Hertfordshire County Council, Kensington and Chelsea and Oxfordshire County Council. In these responses, Newham’s highlighted the current status of identified sites in Newham that manage waste from other areas, whether they were likely to continue operations and provided an update as to the progress of the East London Joint Waste Plan refresh. In relation to Kensington and Chelsea, Newham agreed to continue engaging with one another, where relevant, through the updates to our respective Local Plan Reviews.

4.198 The east London boroughs also held meetings with Tower Hamlets in 2023. In March 2023, Newham responded to Tower Hamlets Early Engagement on Tower Hamlets' Local Plan. In this response Newham outlined that Newham would like to have sight of the LB Tower Hamlets Waste evidence base, which at that stage had not been published. Subsequent to providing this response, Tower Hamlets held a meeting with the east London Borough's to discuss their waste capacity position. As their evidence base had identified a significant deficit of waste management capacity, they requested to work with east London noting the surplus management capacity identified in our evidence base. In May 2023, the east London boroughs advised Tower Hamlets that they would not be able to join the ELWA group to progress the East London Waste Plan. This was because of the established political agreement for joint working between the east London boroughs, as well as the uncertainty around future changes to our identified waste management capacity, noting there were plans to review this through the preparation of the Joint Waste Plan.

#### **Next steps**

- 4.199 Policy W1 (Waste management capacity) of the Submission Draft Local Plan sets out Newham's commitment to manage the apportioned tonnage of household, commercial and industrial waste target set for Newham within the London Plan (2021). Newham will do this in collaboration with the east London boroughs through the update to East London Joint Waste Plan.
- 4.200 The forthcoming updated Joint East London Waste Plan will outline which waste sites within Newham are safeguarded to meet our apportionment target, as well as how Newham will seek to manage other waste streams. Our latest evidence sets out that Newham has more than enough management capacity to meet our apportionment target. Given the location of a number of Newham's waste sites on identified site allocations within the adopted and emerging Local Plan, it is likely that some waste sites will be identified as suitable for release given competing planning requirements (namely Newham's housing requirement target). Newham will, however, have undertaken a review and refresh of the 2022 evidence base given the time period that has elapsed since this study was undertaken.
- 4.201 Sites considered for release will be agreed upon collectively with the other east London boroughs, considering the future waste management needs of East London and London Plan (2021) policy SI9, which requires the proposed release of current waste sites to be part of a plan-led process. However, until agreement is reached with the other East London Boroughs, Newham will continue to safeguard existing waste sites within the borough that contribute to our apportionment target unless compensatory capacity can be made elsewhere within London. This will ensure Newham contributes to delivering net waste self-sufficiency for London by 2026.
- 4.202 Given the need to finalise the refresh of our evidence base on available management capacity, Newham are not currently in a position to agree if any capacity surplus can be distributed to help other London Borough's collectively achieve the London Plan target of net self-sufficiency. However, once our evidence base is finalised, Newham will look to work in collaboration with the GLA and other London Boroughs with identified capacity deficits on how best to balance the release of safeguarded sites and east London's ability to contribute towards net self-sufficiency target set at the regional level. This engagement will likely commence following the publication of the Regulation 18 Joint Waste Plan, which will set out our up-to-date management capacity.



## Social Infrastructure

| Duty to Cooperate Bodies  |   |
|---|---|
| <b>Prescribed</b>   | The Mayor of London (GLA), NHS North East London (Integrated Care Board for north east London), Newham partnership (Newham, the East London NHS Foundation Trust, North East London Foundation Trust, Barts Health NHS Trust, primary care networks and the Newham Health Collaborative to provide primary, secondary and tertiary care and community health services in Newham). |
| <b>Non-prescribed</b>   | Neighbouring boroughs, Sport England, Healthy Urban Development Unit (HUDU), Health and Care Spaces Newham  |
| Strategic Issues  |   |
| <ol style="list-style-type: none"> <li>1. <b>Need for and approach to build leisure facilities</b></li> <li>2. <b>Need for and approach to playing pitches</b></li> <li>3. <b>Health infrastructure requirements</b></li> <li>4. <b>Burial Space</b></li> </ol> |   |

### 1. Need for and approach to built leisure facilities

#### Background

- 4.203 Policy S5, Sports and informal recreation facilities, of the London Plan (2021) requires Local Plans to be informed by a needs assessment for sports and recreation facilities and to secure sites for a range of sports and recreation facilities.
- 4.204 Newham's existing Strategic Leisure Facility Needs Assessment (2017) was drafted under earlier iterations of the London Plan and did not reflect the emerging Newham Local Plan's projected population changes, nor the current condition of the borough's existing built leisure provision. Newham therefore needed to develop a robust and up-to-date assessment in order to demonstrate our ability to meet the sport and recreation needs of our population over the Local Plan period.
- 4.205 In 2022, Planning Policy, working with Newham's Sports and Leisure team, commissioned Strategic Leisure to deliver a Built Leisure Needs Assessment (BLNA) for the council to support the development of social infrastructure policies and designations, in line with Sport England guidance, national and regional policy requirements.

### Key discussion points and outcomes

4.206 The commissioning brief for the BLNA was developed in consultation with Sport England and, as such, it followed the Stages A-C of Sport England’s ‘Assessing Needs & Opportunities’ guidance (ANOG). The assessment included consultation with neighbouring boroughs and the following National Governing Bodies (NGBs). Consultation was undertaken by email and information was also collected through face-to-face meetings, combined with Strategic Leisure Limited’s (SLL) own knowledge about existing and planned leisure facilities:

- Badminton England
- British Gymnastics
- England Athletics
- England Basket Ball
- England Boxing
- England Handball
- England Netball
- England Squash
- Swim England
- Lawn Tennis Association

4.207 Throughout the development of the BLNA, the commissioning team (Planning Policy and Leisure & Sport) and the consultant (Strategic Leisure) has worked collaboratively with Sport England throughout the Local Plan Review on the development of Newham’s Built Leisure Needs Assessment.

4.208 A meeting took place in early 2022 to ensure the brief for the BLNA would meet Sport England’s requirements and that of the NPPF and London Plan.

#### *Draft Local Plan Regulation 18*

4.209 An interim BLNA (2022) was published alongside the Regulation 18 Local Plan consultation to demonstrate progress and early findings. Sport England reviewed the Draft Local Plan and, in light of the BLNA not being complete, it did not consider it to be justified or sound. Sport England in its response to the Draft Local Plan acknowledged that it was aware of the work underway on the emerging BLNA, it welcomed that the work had been initiated and acknowledged that it would provide support in the development of the needs assessment.

4.210 Meetings were held with Sport England in early 2023 to ensure that the structure of the final BLNA report met with Sport England, NPPF 2023 and London Plan 2021 requirements. Further meetings with Sport England, Newham and Strategic Leisure September and October 2023 have resulted in a robust, up-to-date and relevant BLNA which clearly sets out the requirement for built leisure facilities in Newham up until the end of the Local Plan period (2038).

4.211 The BLNA has been used to inform Regulation 19 Local Plan policy, most notably SI1, SI2, SI3, SI4 and GWS5, the neighbourhood visions and relevant site allocations.

### Next steps

4.212 Newham’s BLNA (2024) will be published for consultation alongside the Submission Draft Local Plan.

4.213 We will continue to work with Sport England, NGBs and neighbouring boroughs to ensure Newham’s BLNA (2024) delivers the sporting and leisure facilities Newham requires to address current and future needs.

## 2. Need for and approach to playing pitches

### Background

- 4.214 Policy S5, Sports and informal recreation facilities, of the London Plan (2021) requires Local Plans to be informed by a needs assessment for sports and recreation facilities and to secure sites for a range of sports and recreation facilities.
- 4.215 Newham’s existing Playing Pitch Strategy (PPS) (2017) was drafted under earlier iterations of the London Plan and did not reflect the emerging Newham Local Plan’s projected population changes, nor the current condition of the borough’s existing playing pitch provision. Newham therefore needed to develop a robust and up-to-date assessment in order to demonstrate our ability to meet the sport and recreation needs of our population over the Local Plan period.
- 4.216 In 2022, Planning Policy, working with Newham’s Sports and Leisure and Parks and Assets teams, commissioned Knight, Kavanagh & Page Ltd. (KKP) to deliver a PPS for council to support the development of the green spaces policy and designations, in line with Sport England guidance, national and regional policy requirements.

### Key discussion points and outcomes

- 4.217 The brief for the PPS was developed in consultation with Sport England. Throughout the development of the PPS, Newham’s commissioning team (Planning Policy, Leisure & Sport and Parks & Green Assets) and the consultant (KKP) have worked with Sport England to ensure the resultant Strategy is delivered in accordance with Sport England’s Playing Pitch Strategy (PPS) Guidance (for playing pitch sports) and Sport England’s Assessing the Needs and Opportunities Guide (for ‘non-pitch’ sports).
- 4.218 Further to this, and in accordance with the Sport England PPS process, a Steering Group was set up. It was responsible for the direction of the study from a strategic perspective and for supporting, checking and challenging the work of the project team. The Steering Group will be in place for the implementation of the strategy and is made up of representatives from Newham, Sport England and the relevant National Governing Bodies of Sport (NGBs).
- 4.219 NGBs on the Newham Sport Playing Pitch Strategy:
- Rugby Football League
  - Rugby Football Union
  - London FA
  - Essex FA
  - Football Foundation
  - England Hockey
  - England and Wales Cricket Board (ECB)
  - Essex Cricket
  - Bowls England
  - Lawn Tennis Association

### *Draft Local Plan Regulation 18*

- 4.220 Discussions took place with Sport England in early 2022 to ensure the brief for the PPS would meet the requirements of the NPPF and London Plan 2021 and be in accordance with Sport England’s guidance.

- 4.221 Sport England reviewed the Draft Local Plan and, in light of the PPS not being complete, did not consider the Local Plan to be justified or sound but acknowledged that it was aware of the work underway on the emerging Strategy. Sport England welcomed that the work had been initiated and acknowledged that it would provide support in the development of the PPS.
- 4.222 We have worked with Sport England throughout the development of Newham’s PPS. During 2022 and 2023 meetings were held with Sport England and with the pitch sport national governing bodies (NGBs) to ensure that the PPS accurately reflects the current needs for playing pitch and outdoor sport facilities in Newham and plans positively for future needs across the Local Plan period.
- 4.223 The PPS delivers a vision for the future protection, improvement and development of provision; a series of sport-by-sport recommendations and scenarios; a series of strategic recommendations and a prioritised site-by-site action plan. The PPS has been used to inform Submission Draft Local Plan policy, most notably SI1, SI2, SI3, SI4 and GWS5, the neighbourhood visions and relevant site allocations. The borough has identified playing pitch deficits for football, cricket, rugby union and tennis. However, Newham’s Playing Pitch Strategy (2024) has established that the existing shortfalls identified can be met by better utilising current provision. As such, and as agreed in a meeting in October 2023 with Sport England and KKP, there is no present requirement for the creation of additional pitch provision or the need for sites to be allocated in the Local Plan.

#### **Next steps**

- 4.224 Newham’s PPS (2024) will be published for consultation alongside the Submission Draft Local Plan.
- 4.225 We will continue to work with Sport England and the PPS Steering Group to ensure Newham’s PPS (2024) delivers the playing pitch and outdoor sport facilities Newham requires to address current and future needs.

### **3. Health infrastructure requirements**

#### **Background**

##### *Health provision in Newham*

- 4.226 NHS North East London is the Integrated Care Board for north east London and was formed in July 2022, replacing the North East London Clinical Commissioning Group (CCG). It is formed of seven local borough-based partnerships: Barking and Dagenham, City of London and Hackney, Havering, Newham, Redbridge, Tower Hamlets and Waltham Forest. Each partnership is responsible for planning and buying health services to meet the needs of local people.
- 4.227 Newham’s partnership brings together Newham, the East London NHS Foundation Trust, North East London Foundation Trust, Barts Health NHS Trust, primary care networks and the Newham Health Collaborative to provide primary, secondary and tertiary care and community health services in Newham.
- 4.228 The Health and Care Spaces Newham (HCSN) is a partnership between Newham Council and East London NHS Foundation Trust to enable an integrated health and social care provision through the development of new facilities and housing.

- 4.229 The London Healthy Urban Development Unit (HUDU) helps the NHS to engage and respond proactively to population growth and change in London and to maximise the opportunities to align health and planning agendas to improve health and narrow health inequalities.

### **Key discussion points and outcomes**

#### *Issues and Options and Call for Sites*

- 4.230 Newham has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. A meeting was held with NHS partners in December 2021 to get an update on their work on understanding future healthcare requirements and where this may be needed in the borough. It was agreed that this information would be provided as part of their Call for Sites submission.
- 4.231 The North East London CCG submitted a Call for Sites submission in December 2021. This outlined what it believed to be its future health centre provision requirements, based on GLA population projections. The submission provided future requirements by area, proposals for the re-provision of existing NHS facilities alongside housing and an update on facilities already coming forward. This information was used to inform the development principles and infrastructure requirements in the draft site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note.
- 4.232 Meetings were held with the HCSN in June 2022 and with wider NHS partners in August 2022. These meetings discussed how the Call for Sites submission was informing the preparation of site allocations, any changes to future needs since the Call for Sites submission and an update on existing NHS sites being considered for re-provision with housing. It was agreed that any changes to the sites would be considered once NHS plans were further developed following the Regulation 18. It was agreed that the NHS would share the floorspace requirements for the sites they are looking to redevelop and this information informed the capacity testing set out in the Site Allocation and Housing Trajectory Methodology Note.

#### *Draft Local Plan Regulation 18*

- 4.233 NHS North East London submitted a representation to the Draft Local Plan consultation. The representation stated that a newly established Newham Local Infrastructure Forum will coordinate the development and delivery of health and care infrastructure requirements going forward and its focus will ensure sufficient physical capacity is available to meet current and future needs, including Newham University Hospital.
- 4.234 HUDU also worked with NHS North East London to coordinate responses on behalf of all NHS partners. GIS layers and housing pipeline information was shared with HUDU in July 2023 to support this work. A meeting was held in September 2023 with HUDU and NHS North East London to discuss this work and it was agreed that further coordinated information on NHS healthcare requirements would be submitted by HUDU.
- 4.235 Further information on site allocations was provided by NHS North East London in August 2023 and by HUDU in September 2023. A follow-up meeting took place in to discuss the information provided and to discuss the NHS sites allocated for re-provision of the existing facility along with housing. The meeting discussed the progress on identifying what services these sites would provide and how this would inform the floorspace requirements for these sites, compared to sites that are required due to

population increases from new development. It was agreed that the wording of certain NHS sites would be amended to remove floorspace requirements and that the development principles for these sites would focus on the re-provision of the health centre alongside housing. It was agreed that NHS North East London would provide information to justify the different approach to these sites.

- 4.236 To prepare for the Infrastructure Delivery Plan under the Regulation 19 Local Plan, Newham contacted the NHS partners in Newham through emails in March 2024 to obtain the most up to date information for the delivery of health care facilities in the borough. The NHS provided a coordinated response in April 2024. Their comment has no implication to the Local Plan but it was agreed the comment would be considered in the Infrastructure Delivery Plan review process.

#### **Next steps**

- 4.237 Other issues have been raised by our NHS partners (HUDU, NHS NEL, and NUH) outside of the formal Local Plan consultations. These issues have been summarised in [Appendix 1](#).
- 4.238 We will continue to work with NHS partners to ensure the site allocations support the provision of healthcare facilities to address current and future needs.

## **4. Burial Space**

### **Background**

- 4.239 Local Authorities have no statutory duty to provide burial spaces, however London Plan (2021) policy S7 states that when preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including for those groups for whom burial is the only option. This should be informed by a needs assessment of burial space, including an audit of existing provision and opportunities for the re-use of burial space. Cross-borough and/or sub-regional working is encouraged where appropriate to identify and address the requirements of these groups and to tackle burial space shortages within the sub-region.
- 4.240 Newham contains a large number of in-use and historic cemeteries: West Ham Cemetery, the City of London Cemetery and Crematorium, the East London Cemetery and Crematorium, Woodgrange Park Cemetery and three Jewish cemeteries. All but the three Jewish cemeteries remain available for new burial plots, however available space is reducing and predominantly consists of the reuse of graves.
- 4.241 The latest available information regarding Newham and London's burial space provision is the 2011 Audit of London Burial Provision, undertaken by the GLA. This indicated that due to the number of existing cemeteries in Newham and re-use of graves that provision of burial space in Newham is sustainable. However, stakeholders have raised concerns that there is insufficient burial space for particular communities, especially Muslim communities, and that this a challenge facing many boroughs in north east London. These stakeholders have also approach neighbouring boroughs and in their response to the regulation 18 consultation, the London Borough of Redbridge raised the need to discuss burial space across the two boroughs.

### Key discussion points and outcomes

- 4.242 Discussions were held in April 2024 with planners and regulatory services from both the London Boroughs of Redbridge and Newham, and officers from Newham’s assets team, which discussed the current availability of burial spaces for different communities in their boroughs and options being explored to increase supply.
- 4.243 Redbridge confirmed they were considering whether to explore options to provide a new multi-faith burial space in their borough to meet the needs of their residents. They had explored possible available sites but had found limited options. No decisions had yet been made on options or next steps.
- 4.244 Newham confirmed that we have introduced a new burial policy into the Regulation 19 Local Plan and are commissioning external work to understand need, potential burial ground size and potential in-borough options, including more efficient use of existing sites. If this commission concludes there is no, or only limited in-borough space, we may commission a further study to review out of borough options, including those within our ownership and for purchase.
- 4.245 It was agreed that there was no further planning related duty to cooperate discussions required on this topic but that discussions may continue to occur between regulatory services and with Newham’s assets team should an out of borough option be pursued.

### Next steps

- 4.246 Each borough will continue with their work streams and internal discussions and will keep each other informed of updates and the potential for any future joint working.

## Design, including Tall Buildings

| Duty to Cooperate Bodies   |  |
|--|--|
| <b>Prescribed</b>  | The Mayor of London (GLA), Historic England          |
| <b>Non-prescribed</b>  | Neighbouring boroughs, LLDC, the Metropolitan Police |
| Strategic Issues   |  |
| <ol style="list-style-type: none"> <li>1. Tall buildings and heritage assets</li> <li>2. Tall buildings and consistency with the London Plan</li> <li>3. Inclusive Design</li> </ol> |  |

### 1. Tall Buildings and heritage assets

#### Background

- 4.247 London Plan (2021) Policy D9 requires boroughs to identify location where tall buildings may be an appropriate form of development in order to optimise the use of land and meet the housing need.

4.248 In 2022 Newham published Newham Characterisation Study (2022) as evidence base document to support the refresh of the Local Plan for Regulation 18 consultation. The document is a borough wide assessment developed in line with the Characterisation and Growth Strategy LPG and includes a tall building assessment which replaces the Tall Building Study (2018). Newham Characterisation Study has been supplemented with the Tall Building Annex (2024) for Submission Draft Local Plan. This document summarises the sieving exercise that has been undertaken to identify suitable locations for tall buildings based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets.

#### **Key discussion points and outcomes**

- 4.249 In July 2021 Historic England was engaged regarding the methodology to adopt for the Characterisation Study. Through email correspondence, Historic England suggested the London's Historic Character Thesaurus & user guide (2021) to identify area types in the Characterisation Study and inform the tall building study. The draft document was shared with Newham and has informed the Newham Characterisation Study methodology and the tall building strategy.
- 4.250 Newham Characterisation Study (2022) was also discussed with the GLA. The document was shared and the GLA was broadly supportive of the approach and confirmed it aligned with the emerging Characterisation and Growth Strategy LPG.
- 4.251 During the consultation on the Draft Local Plan Historic England raised concern on the impact tall buildings could have on heritage assets in particular in Stratford and Maryland neighbourhood and has requested more design guidance on how development proposal with tall buildings can achieve the conservation and enhancement of the historic environment.
- 4.252 Historic England also expressed their concern about the potential lack of understanding of impact on significance and how this should inform design parameters as per the [HEAN 3](#), in particular for Stratford Area.
- 4.253 An online meeting with Historic England took place on the 15<sup>th</sup> August 2023 to discuss these two main areas of concern.
- 4.254 During the meeting, Newham proposed a new approach to the wording of D4 Tall Building Zone policies and N8 Neighbourhood and Site Allocation Design Principles to better reference heritage considerations. Historic England welcomed the proposed approach in principles and offered to review the Regulation 19 amended policy text through further email correspondence.
- 4.255 D4 Tall Building Zone policies and N8 Neighbourhood and Site Allocation Design Principles wording have been implemented and reviewed by Historic England in order to expand and clarify how tall buildings could enhance the character of the heritage asset.
- 4.256 In relation to the second area of concern, Newham indicated that the potential harm to heritage assets has been considered as one of the criteria to identify suitability for site allocation as described in the Site Allocation Methodology Note ([Site Allocation and Housing Trajectory Methodology Note](#)). Whilst Historic England would have liked a review of the Stratford Heritage Assessment to be undertaken, Newham indicated that resources wouldn't allow for this assessment and proposed instead to expand the Characterisation Study with the finding of the built environment assessment of



each neighbourhood that was undertaken as evidence base but not published in its entirety in Newham Characterisation Study. See Tall Building Annex (2024).

### **Next steps**

- 4.257 Newham will continue engaging with Historic England to address their concern and will take in consideration the review of the St John’s Conservation Area Appraisal and Management Plan when resources will be available.

## **2. Tall buildings and consistency with the London Plan**

### **Background**

- 4.258 London Plan (2021) Policy D9 requires boroughs to identify location where tall buildings may be an appropriate form of development in order to optimise the use of land and meet the housing need.
- 4.259 Policy D9 part A, in particular, requires boroughs to identify in their development plan what is considered a tall building for their specific localities and Policy D9 part B requires boroughs to define the maximum height that could be acceptable in these location.
- 4.260 Policy D9 part C sets out a comprehensive list of criteria for tall buildings to meet – visual, functional, environmental and cumulative impacts to make sure that tall buildings play a positive role in shaping the character of an area.
- 4.261 Policy D3 of the London Plan seeks to optimise site capacity through the design-led approach promoting the “*most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity*”.
- 4.262 In line with both, Policy D9 and Policy D3 suitable location for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarises the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expand on the townscape assessment for each area of the borough.
- 4.263 Local Plan Policy D4.3 and relevant implementation text, in line with London Plan Policy D9 parts C and D, address the impact of tall buildings and requires development with tall buildings in designated Town centre to provide viewing platforms at higher levels.

### **Key discussion points and outcomes**

- 4.264 In July 2021, the Greater London Authority (GLA) was engaged in regard of the tall building strategy included in the Newham Characterisation Study (2022). The document was shared with the GLA, who were broadly supportive of the approach and confirmed it aligned with the emerging Characterisation and Growth Strategy LPG.

- 4.265 During the consultation on the Draft Local Plan the GLA supported Local Plan Policy D4 and its compliancy with London Plan Policy D9, in terms of tall building definition and identification of Tall Building Zones and maximum heights mapped in the policy map. However, the GLA suggested to refine the policies further and to expand the text of TBZ19: Stratford Central and TBZ20: Chobham Manor / East Village - which are within the background of a protected linear view: King Henry VIII's Mound, Richmond to St Paul's Cathedral (9A) - with the request for schemes to test impacts on London View Management Framework (LVMF) views.
- 4.266 Following Regulation 18 consultation, TBZ19: Stratford Central and TBZ20: Chobham Manor / East Village policy text has been amended as suggested to respond to the GLA representation and ensure that tall buildings will result in no harm on the protected vista.

### **Next steps**

- 4.267 Newham will continue to consult with the GLA in relation to Tall Building Zones.

## **3. Inclusive Design**

### **Background**

#### *National Policy*

- 4.268 The NPPF (December 2023) paragraph 96 requires LPAs to plan for healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
  - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
  - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through layouts that encourage walking and cycling.

#### *Evidence Base*

- 4.269 Research undertaken by LLDC (and other organisations), identifies the need for gender inclusive design of places in order to address persistent inequalities in the quality, accessibility and perception of safety of the built environment experienced by women, girls and gender non-conforming people. In order to address local concerns, the LLDC, in partnership with neighbouring authorities (Newham, Tower Hamlets and Hackney), have commissioned further research and the development of specific design guidance to address these issues in principle, as well as provide specific recommendations for sites within the LLDC land ownership. This process began in September 2022.

- 4.270 The nationally-recognised Secured by Design guidance and accreditation framework was updated in 2023 and 2024.

### **Key discussion points and outcomes**

#### *Gender-inclusive guidance development*

- 4.271 Newham has participated in various stages of the development of the gender-inclusive design guidance, primarily through meetings set up by the LLDC, but also through emails to share information and progress any actions between meetings.
- 4.272 Between September 2022 and February 2023, officers met monthly with LLDC and representatives of Tower Hamlets and Hackney to discuss the brief, the evidence available to support the work, and how the future guidance may be useful following the dissolution of the LLDC as a planning authority. A further meeting took place in April 2023, which provided a forum to discuss the development of the Newham Local Plan and how the research is being embedded into the policies.
- 4.273 On 26<sup>th</sup> July 2023 a wider workshop took place with development management and director level representatives from the LLDC's neighbouring boroughs to present the emerging findings and guidance.
- 4.274 The Draft Local Plan policies provided broad support for gender-inclusive design by imbedding design principles in policies D1 and D2 (e.g. the need for clear sight lines in public realm, active frontages for passive surveillance, good lighting, choice of routes), by promoting early engagement, and by requiring developers of evening and night time visitor economy uses to create safe and welcoming environments, including through participating in local safety and security programmes.
- 4.275 LLDC responded positively to the Draft Local Plan policies and recommended that they could be strengthened by further specifying support for gathering of gender-desegregated data as part of developer-led engagement, and that design policies should more clearly refer to inclusivity by referring to existing best practice guidance. These recommendations, alongside further information emerging via the Gender Inclusive Design Guide project, have resulted in revised wording of Regulation 19 policies D1, D2, BFN2 (in relation to meanwhile uses), HS1 and HS5.

#### *Secured by design policies and planning obligations*

- 4.276 The Metropolitan Police Service has commented on the Draft Local Plan to note their support for the policies broadly aligning with the guidance of Secured by Design standard, for the recognition of the potential to seek planning obligations to deliver additional safety infrastructure, and for the requirement for developers to seek accreditation of meeting the standard. They further recommended that:
- Secured by Design accreditation should be sought specifically for major developments. This clarification has been made as part of policy D1.
  - The British Standard for outdoor lighting BS 5489 should be promoted. This guidance has been included as part of implementation of policy D2.
  - A specific safety and security policy be provided in the plan. Newham did not consider this change to be necessary as designing for the prevention of crime and supporting people to feel

safe are considerations suitably addressed through policy D1 and a range of other policies across the Plan.

### Next steps

- 4.277 A draft of the guidance was shared with Newham in February 2024, with feedback provided back to the LLDC to inform the final draft. The final draft has now been published and has been published as part of the Regulation 19 evidence base.
- 4.278 We will continue to engage with the LLDC and the Metropolitan Policy Service on inclusive design.

## Green and Water Infrastructure

| Duty to Cooperate Bodies  |  |
|---|--|
| <b>Prescribed</b>   | The Mayor of London (GLA), Natural England   |
| <b>Non-prescribed</b>   | Neighbouring boroughs, Epping Forest District Council, Lea Valley Regional Park Authority, Royal Docks Team (RDT), London Wildlife Trust, Thames Water, Port of London Authority (PLA) |
| Strategic Issues  |  |
| <ol style="list-style-type: none"> <li>1. <b>Newham Green Belt and Metropolitan Open Land review</b></li> <li>2. <b>Urban Greening Factor (UGF)</b></li> <li>3. <b>Sites of Importance to Nature (SINCs) review and approval</b></li> <li>4. <b>Role of Lee Valley Regional Park in the Local Plan</b></li> <li>5. <b>Epping Forest</b></li> <li>6. <b>Port of London Authority (PLA) work on the Tidal Thames Masterplan for Newham</b></li> </ol> |  |

### 1. Newham Green Belt and Metropolitan Open Land review

#### Background

- 4.279 The government attaches great importance to Green Belts. The National Planning Policy Framework (NPPF) 2023 states that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’ (paragraph 142).
- 4.280 It should be noted that, once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated (paragraph 145). NPPF 2023 sets the exceptional circumstances needed to justify changes to Green Belt boundaries (paragraph 144) and the considerations which need to be met when defining Green Belt boundaries (paragraph 147 and 148).

- 4.281 London's Green Belt serves multiple important functions for the city, mitigating the impacts of climate change, providing space for food growing, preventing flooding, providing important habitats for wildlife and allowing space for recreation and relaxation for Londoners.
- 4.282 London Plan 2021 Policy G2, London's Green Belt, seeks to protect the Green Belt from inappropriate development. The policy requires demonstration of exception circumstances to justify either the extension or de-designation of the Green Belt through the preparation of a Local Plan.
- 4.283 London Plan 2021 Policy G3, Metropolitan Open Land, of the London Plan sets out that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Policy G3 requires boroughs to work with partners to enhance the quality and range of uses of MOL. The policy sets out that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- 4.284 London Green Belt can be thought of as a permanent area of open land that surrounds the city whereas MOL relates to strategically significant open spaces within the built environment of London.

*Evidence Base – Newham, Green Belt and Metropolitan Open Land Review (2024)*

- 4.285 In 2022/3 Jon Sheaff and Associates and London Wildlife Trust, undertook a review of Newham's Green Belt and Metropolitan Open Land to regularise the existing designations, understand if there were any omissions and to ensure that the existing designations met the criteria of the NPPF and London Plan. The report's findings are set out on the Policies Map and provides the evidence that Newham's MOL meets one of the following criteria:
- Making a contribution to the physical structure of London by being clearly distinguishable from the built-up area
  - Including and/or adding to the provision of open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
  - Containing features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
  - Forming part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

Specifically, in a Newham context, the proposed changes to MOL designations:

- Strengthen the water/green infrastructure network (Thames Path, Lea Valley, Roding Valley and Greenway)
- Conform to at least one of the four criteria set out in London Plan Policy G3.

### Key discussion points and outcomes

- 4.286 In accordance with Policy G3C of the London Plan (2021), it is our duty to consult with relevant adjoining boroughs on any proposed alterations to the MOL boundary.
- 4.287 In January 2023 we met, in an online meeting, with the GLA and shared a copy of the draft Green Belt and Metropolitan Open Land Review.
- 4.288 In September 2023 we shared a copy of the draft Green Belt and Metropolitan Open Land Review with London Borough of Havering, London Borough of Barking and Dagenham, London Borough of Tower Hamlets, London Borough of Hackney, London Legacy Development Corporation and Lee Valley Regional Park.
- 4.289 On 12 September 2023 we met, in an online meeting, with our neighbouring authorities. Lee Valley Regional Park Authority were unavailable to meet at the date organised for the full borough meeting, as such we corresponded with them separately, via email, to review the work undertaken on MOL boundaries. To-date, Lee Valley Regional Park has not raised any issues or concerns with regard to this work.
- 4.290 Minutes from the meeting were sent to all neighbouring authorities present. There was universal support for the method and approach taken to Newham's Green Belt and MOL Review (Nov 2022). The authorities present were supportive of the addition of the following proposed MOL sites:

- i) West Ham Park
- ii) Thames Barrier Park

The authorities present at the meeting were supportive of the proposed amendments to MOL boundaries:

- i) East Ham Sports Ground (former gas works).
- ii) Langdon Academy.

The authorities present at the meeting were supportive of the MOL de-designation:

- i) The centre of the roundabout that marks the junction of the A13 Newham Way, the A1020 Royal Docks Road and the A406 North Circular Road is designated as MOL.

- 4.291 Following the September 2023 meeting, Newham undertook further email correspondence with the London Legacy Development Corporation regarding the Queen Elizabeth Olympic Park MOL designation. This resulted in some amendments to the proposed Queen Elizabeth Olympic Park MOL. However, there remains a small area of proposed MOL which the London Legacy Development Corporation and Newham disagree on. This area of MOL, and the reasons for its designation as MOL, is set out Newham's Green Belt and Metropolitan Open Land Review (2024).
- 4.292 In addition to the proposed additions to the MOL at the Queen Elizabeth Olympic Park, at Regulation 18, London Legacy Development Corporation noted there to be a reduction in the area of adopted Metropolitan Open Land, associated with the Queen Elizabeth Olympic Park, from that designated in the LLDC Local Plan. The extent of the Metropolitan Open Land at the QEOP on the Regulation 18 Policies Map was a mapping error which has now been corrected.

4.293 At Regulation 18, Thames Water objected to the existing Metropolitan Open Land designation on its land at Beckton Sewage Works. A change to this policy approach has not been made as London Plan Policy G3 stipulates that Metropolitan Open Land boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified. A review of Newham’s Metropolitan Open Land and Green Belt has been undertaken ensure that the existing designations reflected the NPPF (2023), London Plan (2021) and Newham’s strategic requirements for green infrastructure.

**Next steps**

4.294 Newham’s Green Belt and Metropolitan Open Land Review (2024) has been published for consultation alongside the Submission Draft Local Plan.

4.295 We will continue to work with the GLA and our neighbouring authorities on the proposed revisions to Newham’s MOL.

**2. Urban Greening Factor (UGF)**

**Background**

4.296 London Plan Policy G5, Urban greening, requires all major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design. The Mayor has set urban greening targets of 0.4 for predominantly residential developments and 0.3 for predominantly commercial developments (excluding B2 and B8 uses). Despite setting target scores, the London Plan policy recognises that London boroughs may wish to set their own target scores based on the needs and challenges faced by different boroughs.

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

4.298 In February 2023 the Mayor of London produced [London Plan Guidance, Urban Greening Factor \(GLA, 2023\)](#) to support boroughs regarding the application of the UGF. The guidance requires boroughs UGF targets to be based on evidence relating to the need and opportunity for new green infrastructure, ensuring it is both locally relevant and achievable. In order to retain the integrity of the UGF approach, boroughs should retain:

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

4.299 Since the guidance requires boroughs to maintain the calculation methodologies already provided, this limits the scope for boroughs to prepare bespoke approaches.

4.300 Following publication of the final version of the Urban Greening Guidance by the Mayor of London in February 2023 it was decided, in consultation with the consultants working on Newham’s Green and Water Infrastructure Strategy (Jon Sheaff and Associates and London Wildlife Trust) not to explore a bespoke UGF option for Newham but to instead implement Policy G5 of the London Plan as adopted.

### **Key discussion points and outcomes**

- 4.301 During the Regulation 18 consultation, in January 2023, we had one meeting with the GLA on the issue of the London Plan Urban Greening Factor and its application in Newham. In this meeting we provided the GLA with an update on the emerging findings of the Green and Water Infrastructure Strategy and the decision to not take forward a bespoke UGF.

### **Next steps**

- 4.302 Policy GWS3: Biodiversity, urban greening and access to nature, is available to comment on during the Submission Draft Local Plan consultation.

## **3. Sites of Importance to Nature (SINCs) review and approval**

### **Background**

#### *National Planning Requirements*

- 4.303 The NPPF 2023 highlights the importance of open space in delivering wider benefits to nature and helping to address the impact of climate change. The NPPF requires planning policies to be based on robust and up-to-date assessments for the need for open space (paragraph 102).
- 4.304 London Plan Policy G6, Biodiversity and access to nature, sets out the Sites of Importance to Nature (SINCs) should be protected and that Borough, in developing Local Plans, should use up-to-date information about the natural environment and the relevant procedures to identify SINCs.
- 4.305 SINCs are those areas of land which are recognised as being of particular importance for wildlife and biodiversity. Although a non-statutory designation, SINCs are afforded a high level of protection within the planning system.
- 4.306 London Plan Policy G6 requires London boroughs to:
- Use relevant criteria to identify SINCs and ecological corridors to identify coherent ecological networks.
  - Identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them SINCs are described as part of a hierarchy depending on their relative importance:
    - Sites of Metropolitan Importance – strategically important nature conservation sites for London.
    - Sites of Borough Importance – sites which support habitats or species of value at the borough level.
    - Sites of Local Importance – sites which provide access to nature at the neighbourhood level.



- 4.307 The distinction between Metropolitan, Borough and Local SINC is based on long standing guidance originally produced by the London Ecology Unit, updated in April 2019 to align with London Plan policy.
- 4.308 An assessment of Newham's SINC was undertaken by London Wildlife Trust between June-August 2022 to inform the Draft Local Plan. This involved a desk-top review of existing information about Newham's SINC (including those within the area currently administered by the London Legacy Development Corporation) and analysis of aerial imagery followed by site visits to existing SINC and other sites identified by the desk-top study.
- 4.309 The specific purpose of the Newham SINC review was to review the current SINC and identify potential changes to boundaries or status, and justify these changes as necessary. It was also to identify and justify potential new SINC to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC.

#### **Key discussion points and outcomes**

- 4.310 During the consultation on the Draft Local Plan, Thames Water objected to the SINC designation on its land at Beckton Sewage Works. In addition, the London Legacy Development Corporation (LLDC) raised concerns with the proposed SINC designation at the Queen Elizabeth Olympic Park.
- 4.311 Both areas of SINC remain in place. We did not consider changes to the above areas of SINC to be necessary because the review has systematically looked at the current SINC designations and identified potential changes to boundaries or status, and justify these changes as necessary. It has also identified and justified potential new SINC to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designation for Beckton Sewage Treatment Works and the QEOP remain in place. Please see the Newham SINC Review (2022).

#### **Next steps**

- 4.312 Newham's Sites of Importance for Nature Conservation Review (2022) has been published for consultation alongside the Submission Draft Local Plan and the proposed SINC designations are published on the Polices Map.

## **4. Role of Lee Valley Regional Park in the Local Plan**

### **Background**

- 4.313 Lee Valley Regional Park is known and recognised as one of the nation's great parks; a place that offers a unique combination of activities, sights and experiences. For over 50 years the Lee Valley Regional Park Authority (LVRPA) has been working alongside many partner organisations to transform the post-industrial land along the River Lee into a place for leisure, recreation, sport and nature.

- 4.314 The Park includes a number of facilities delivered as part of the legacy of the London 2012 Olympic and Paralympic Games. These facilities include the, Lee Valley VeloPark, and Lee Valley Hockey and Tennis Centres, all within the Olympic Park at Stratford.
- 4.315 The Lee Valley Park Development Framework is a suite of documents that collectively provide the blueprint for the future of the area. In July 2010, the Authority adopted the Vision, Strategic Aims and Principles followed by adoption of a series of Thematic Proposals in January 2011 which set out development and management proposals on a broad Park-wide thematic basis.
- 4.316 The thematic proposals have been translated onto area based maps in line with Section 14 of the Lee Valley Regional Park Act 1966 (the Park Act) and provide specific proposals covering the whole Park. These are known as the Area Proposals and replace the previous Park Plan Part Two Proposals. Local planning authorities in whose boundaries the Regional Park lies are required under the provisions of section 14(2) of the Park Act to include the relevant Area Proposals in their Local Plans. Their inclusion does not however imply approval of the local planning authority. Newham falls within thematic proposal 'Area 1 Proposals – Tidal Reaches to Queen Elizabeth Olympic Park'. It should be noted that part of Newham currently falls within the boundary of the London Legacy Development Corporation (LLDC) Planning Authority and the planning powers will soon return to Newham.

#### **Key discussion points and outcomes**

- 4.317 We have met online, undertaken productive discussions and correspondence with Lee Valley Regional Park Authority (LVRPA) throughout development of Newham's emerging Local Plan.

#### *Issues and Options*

- 4.318 LVRPA made representations on the Issues and Options draft of the Local Plan in 2021. These are summarised as follows:
- Supportive of Newham's approach to incorporate the area currently under LLDC planning powers into the emerging Local Plan.
  - The Local Plan should include a statement in support of the Lee Valley Regional Park Authority and the Park Action Section 14 (2) (a).
  - Design policies should consider heritage and biodiversity value of open spaces, openness of water spaces and views into the Park.
  - Request for additional investment to be secured for the Regional Park via planning obligations (CIL/S106) from developments adjacent to the Park.
  - More focus needed on the visitor economy.
  - Supportive of the emphasis on access to nature and open space.
  - Supportive of the policies in the Climate chapter.
  - Supportive of the approach to transport, seeking improvements to the improving links to the linear routes alongside the waterways and through the Regional Park and QEOP. Also raised the opportunity for the VeloPark and other sites with the QEOP to contribute to the electrical charging network.

4.319 These comments included were considered and fed into the Draft Local Plan.

*Regulation 18*

4.320 LVRPA made further representations on the Regulation 18 Local Plan. The comments included:

- A need to include a specific policy statement on the Lee Valley Regional Park.
- The need to reflect the Regional Park and its needs better in the Social Infrastructure chapter and policies.
- Specific feedback on policies D4 Tall Buildings, GWS2 Water spaces and GWS3 Biodiversity, urban greening and access to nature
- The need to better reflect the Regional Park in relevant Newham Local Plan neighbourhood policies (N5, N7, N8) and site allocations (N5.SA4, N5.SA5, N7SA1, N7SA2).
- A desire to engage with Newham’s emerging Green and Water Infrastructure Strategy.

4.321 Newham has corresponded with LVRPA, including an online meeting in September 2023, to work towards an agreed position on reference to the Regional Park in the Submission Draft Local Plan. Policy amendments have been made to the Local Plan to address discussions and correspondence on the issues raised by LVRPA. The changes include:

- Amendment to Policy BFN1 and its justification to include reference to make clear Newham’s support for the Lee Valley Regional Park and the associated Development Framework (Area 1).
- Policy SI3 has been updated to make reference, in the justification text, to the importance of the sport and recreation facilities in the Queen Elizabeth Olympic Park.
- The wording of Policy D4 and relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas.
- The implementation text for policy D4.3 has expanded, so that the environmental impact considerations section requires the impact of tall buildings on watercourse and open space to be considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of their impact on biodiversity and existing and proposed public open space, including watercourses.
- New policy wording in GWS2, Water spaces, to strengthen the policy intention, which is to appropriately balance the need to activate water spaces with other considerations.
- Reference to the Authority’s Biodiversity Action Plan 2019 – 2029 has been included in the evidence base section for Policy GWS3.
- Relevant neighbourhoods and site allocations have been updated to make reference to the Lee Valley Regional Park.

- Policy BFN1 specifically mentions the need for bridges across the Lea and crossings over the Lea are already indicatively reflected spatially in the Key Diagram. In addition, the Neighbourhoods chapter includes details on improvements to access to and quality of the River Lea edge and specifically mentions bridges in two Neighbourhoods (N6. Manor Road and N8. Stratford and Maryland). There is mapping to support this on at N8. but not at N.6, since the Manor Road neighbourhood has no site allocations.

### Next steps

- 4.322 Newham will continue to work positively with the LVRPA as the Local Plan progresses.

## 5. Epping Forest

### Background

#### *Epping Forest SAC and Status*

- 4.323 Epping Forest is a designated Site of Special Scientific Interest (SSSI) and a portion is designated as a Special Area of Conservation (SAC). SACs are internationally important areas given special protection under the EU's Habitats Directive (92/43/EEC) which is transposed into UK law by the Habitats and Conservation of Species Regulations 2017 as amended (known as the Habitats Regulations).

#### *Legal Duty*

- 4.324 Newham, as a 'competent authority' under the Habitats Regulations, has a duty to ensure that plans and projects which it has responsibility for consenting will not have an adverse effect on the integrity of the SAC. Where development plans or projects will have an adverse effect on the integrity of these sites, either alone or in combination with other plans and projects, Newham must assess the implications of such effects, and secure any avoidance or mitigation measures necessary to prevent an adverse effect on the integrity of the site.

#### *Pressures on Epping Forest*

- 4.325 Epping Forest SAC is experiencing considerable pressure on its habitats from visitors and from air pollution which have resulted in adverse effects on its sensitive ecosystems. As a result, the conservation objectives for the SAC now include requirements to restore important site features.
- 4.326 Visitor pressure primarily arises from new residential development creating additional visitors using the Forest for recreational purposes, including some uses which are particularly impactful, such as dog walking and mountain biking.
- 4.327 Atmospheric pollution originates from a wide variety of sources including traffic, power generation, industry, commercial and domestic boilers and from agriculture, most of which is located some distance from the Forest itself.

## Key discussion points and outcomes

### *An interim approach to visitor pressure (mitigation and avoidance)*

- 4.328 In 2018, during the development of the adopted Newham Local Plan, and as a result of these identified adverse effects, as well as new UK and EU case law, Natural England raised concerns about the impact housing growth in the area around Epping Forest was having on the visitor pressure being experienced in the SAC with Newham and other impacted local planning authorities.
- 4.329 A visitor survey was undertaken by Epping Forest District Council as part of their Local Plan preparation to understand where the visitor pressure was originating from. From the survey a Zone of Influence (ZOI) of 6.2km was established around the SAC.
- 4.330 Natural England advised that all authorities within the ZOI would be required to secure avoidance measures from developments within the whole ZOI and mitigation measures from developments within the inner ZOI. Avoidance measures were considered on an individual borough basis but Natural England worked with the affected boroughs and the City of London Conservators of Epping Forest (who manage Epping Forest) to develop an interim Strategic Access Management Measures Plan, which would mitigate the impact of visitor pressure.
- 4.331 The Interim Habitats Funding Statement was adopted by Newham in 2019.

### *A formal joint Strategic Access Management Measures Strategy (mitigation)*

- 4.332 A Technical Oversight Group of officers was established in 2020 to develop a formal Strategic Access Management Measures Strategy (SAMM Strategy) which includes an agreed set of mitigation projects, a revised financial contribution for each borough and a governance process to oversee the expenditure.
- 4.333 The Group comprises officer representation from:
- Epping Forest District Council
  - LB Waltham Forest
  - LB Redbridge
  - LB Enfield
  - Newham
  - Natural England
  - Conservators of Epping Forest
  - Officers from Harlow District Council, the London Legacy Development Corporation and Essex County Council also attend on a 'watching brief' only basis.
- 4.334 In June 2022, Newham Cabinet formally agreed the proposed Strategic Access Management Measures Strategy, governance arrangements and updated approach to securing financial contributions to mitigate visitor pressure on the Epping Forest Special Area of Conservation.

Delegated authority was given to sign and seal the final Epping Forest SAC Strategic Access Management Measures Strategy Partnership Agreement.

- 4.335 Following authorisation from all parties, the Epping Forest SAC Strategic Access Management Measures Strategy Partnership Agreement was formally sealed and agreed in January 2024.

*A formal approach to Suitable Alternative Natural Greenspace (SANG) (avoidance)*

- 4.336 Natural England provided representations to both the Issues and Options and Draft Local Plan consultations to suggest that Newham should use the Local Plan refresh as an opportunity to put together a SANGs strategy that would allow new developments coming forward to contribute towards pre-agreed measures.
- 4.337 They highlighted they were working with the boroughs of Redbridge, Waltham Forest and Enfield to put together borough wide approaches to SANG style measures (the toolbox approach). They also stated that they had also visited LLDC, and fed into a list of possible projects within LLDC that could fit the criteria of the toolbox approach to form mitigation. They suggested that as a large part of LLDC will return to Newham at the end of 2024, Newham and LLDC should have similar approaches to Epping Forest mitigation.
- 4.338 Further discussions were held with Natural England during 2023 and 2024 to confirm that the interim approach should continue until we have developed a SANGs strategy and that we should develop this SANGs strategy alongside the Local Plan refresh.
- 4.339 The LLDC provided the work they have undertaken and are continuing to undertake to identify a list of possible projects within LLDC.
- 4.340 A brief to commission the Strategic Suitable Alternative Natural Greenspace strategy was developed in 2023, using examples and inputs from LB Redbridge who had already commissioned such a strategy. The brief requires consideration of the work undertaken by the LLDC. The brief was shared with Natural England who confirmed it met their requirements.

*Air Quality Impacts on Epping Forest SAC*

- 4.341 When assessed during the production of the adopted Newham Local Plan, it was considered that policies at the national and regional and local level on air quality improvement, reduction of congestion, improved vehicular emissions, and promotion of active travel reinforce trends that are reducing the overall likelihood of air quality effects arising. This was reinforced by a policy requirement for any significant developments which are considered likely to give rise to traffic increases on the sections of the A12 / A406 that pass within 200m of the SAC to undertake a habitats regulation assessment which will consider the impacts on the SAC.
- 4.342 Natural England provided representations to both the Issues and Options and Draft Local Plan consultations to suggest that the Habitats Regulation Assessment for the Local Plan should consider Air Quality impacts on Epping Forest SAC in further detail, and that this will need to be considered through the appropriate assessment process.
- 4.343 In August 2023, we commissioned WSP, who are undertaking the Habitats Regulation Assessment as part of the Integrated Impact Assessment for the Local Plan to undertake an Air Quality Impact Assessment for Epping Forest Special Area of Conservation. This will feed into the HRA and provide a

conclusion regarding whether no risk of a likely significant effect on the EFSAC can be determined as a result of this assessment or a full appropriate assessment would be required. Natural England reviewed and agreed the brief and have been kept updated on the ongoing work.

**Next steps**

- 4.344 We will now implement the Strategic Access Management Measures Strategy Partnership Agreement, including the new proposed charges and approach to securing funds.
- 4.345 Commissioning the Suitable Alternative Natural Greenspace strategy commenced in February 2024 and we will work with Natural England to review its development, conclusions and delivery. The Air Quality Impact Assessment has fed into the Habitats Regulation Assessment for the Local Plan.

**Climate Change**

| Duty to Cooperate Bodies   |                               |
|--|-------------------------------|
| Prescribed   | The Mayor of London (GLA)     |
| Non-prescribed   | Neighbouring boroughs, Cadent |
| Strategic Issues   |                               |
| <ol style="list-style-type: none"> <li>1. Coordinated and aligned approach to delivering net zero</li> <li>2. Heat networks in Newham</li> </ol> |                               |

**1. Coordinated and aligned approach to delivering net zero**

**Background**

- 4.346 The Climate Change Act 2008 legislates that the UK carbon account for 2050 must be 100 per cent lower than 1990 levels – i.e. the UK must be Net Zero Carbon by 2050. The Mayor of London has declared a Climate Emergency, and brought forward the target for London to be Net Zero to 2030. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.
- 4.347 As part of the development of the Local Plan, Newham commissioned the Climate Change Evidence Base from Etude, which guides our future Climate Emergency policies. The Planning Policy team is also working collaboratively across Newham to ensure a Just Transition, and allow us to achieve our Climate Emergency targets.

**Key discussion points and outcomes**

- 4.348 Newham met with the GLA in January 2023 during the Regulation 18 consultation period to discuss the differences between the Draft Local Plan and the London Plan 2021, and the challenge of having conflicting policies. The GLA considered the Climate Emergency policies to be progressive, and EUI targets as policy requirements were not an issue. However, the GLA did have concerns regarding the implementation of the policy, noting that a proliferation of standards from different London boroughs may lead to “unnecessary burdens on the applicant”. Newham consider that our policy

approach complies with the overall aim of the London Plan – new buildings being net zero carbon – and that using a different policy approach (absolute energy targets) is a better route to delivering the overall aim of net zero.

- 4.349 Other London boroughs are using or proposing a similar policy approach (absolute energy targets), and we therefore consider that the variety of conflicting energy policies in London will reduce over time as the policy approach is adopted further.
- 4.350 We have therefore maintained our policy approach.
- 4.351 In January 2023, Newham met with Cadent to discuss the potential future use of hydrogen in Newham, and potential demand for hydrogen in the borough. Following discussions with our Climate Change consultations subsequent to the meeting, we maintained our policy approach, not supporting the use of hydrogen for heating of buildings. We continue to monitor the potential for green hydrogen decarbonising heavy industry and aviation in the future.

#### **Next steps**

- 4.352 Newham will continue to work closely with other London local authorities to ensure a similar approach for Climate Emergency and Energy policies. London local authorities continue to lobby the GLA to adopt the absolute energy target approach in a future London Plan.

## **2. Heat Networks in Newham**

### **Background**

- 4.353 The borough has two heat networks – one located in the Royal Docks, serving the ExCeL Centre and one located in the Olympic Park, serving the developments surrounding the park. Both heat networks use Combined Heat and Power (CHP) – producing electricity from burning natural gas, and using the heat produced to heat water for use in homes and businesses. When these heat networks were installed, the UK's electricity grid still used substantial amounts of fossil fuels, with coal producing 38% of the UK's electricity in 2000. The installation of CHP heat networks was considered to be positive, as burning of natural gas is less polluting than coal, and the "waste heat" from electricity generation is used to heat homes and businesses.
- 4.354 The London Legacy Development Corporation (LLDC) has a long term contract with EQUAANS, the operator of the Olympic District Heat Network (DHN) to connect new developments to the heat network as they are built. In the long term, EQUAANS plan to decarbonise the Olympic DHN by the late 2030s.
- 4.355 As part of the development of the Local Plan, Newham commissioned the Climate Change Evidence Base from Etude, which guides our future Climate Emergency policies. This evidence base outlines that we must move away from the use of gas for heating if we are to achieve Climate targets, and therefore the Draft Local Plan policy does not support new gas connections, and only allows connections to fully decarbonised heat networks.



### **Key discussion points and outcomes**

- 4.356 In January 2023, Newham met with the GLA, following concerns raised that the Draft Local Plan policy does not support heat networks to expand and decarbonise over time. The existing London Plan policy supports connections to heat networks where decarbonisation plans are in place.
- 4.357 Newham outlined their support of heat networks generally, but noted that permitting connections to fossil fuelled heat networks could lead to partial decarbonisation, where heat pumps and “sleeving” allow new connections to the heat network without using additional fossil fuels. Newham did not wish continued use of fossil fuels in the Olympic DHN, noting that the planned decarbonisation of the DHN in the late 2030s could be outside the lifetime of the Local Plan.
- 4.358 There was also some concern regarding the capacity of the electricity network if individual electric heating systems were used across the borough.
- 4.359 Newham’s Climate Action team continues to push the LLDC and EQUAANS to decarbonise the Olympic DHN, as part of wider decarbonisation efforts.  
To prepare for the Infrastructure Delivery Plan under the Regulation 19 Local Plan, Newham met with the RDT in March 2024 and followed up with emails to obtain the most up to date infrastructure projects in the Royal Docks. The RDT provided an update on the delivery status of the district heat network in Royal Docks and this has been reflected in the updated Infrastructure Delivery Plan.

### **Next steps**

- 4.360 Following these discussions, the policy has been amended to clarify the intention of the policy. In Newham’s Submission Draft Local Plan, connections to existing heat networks will only be permitted where a fully funded decarbonisation plan that will be implemented within the lifetime of the plan has been agreed.

## **3. Impact of development on infrastructure**

### **Background**

#### *Regional Requirements*

- 4.361 Policy SI3 of the London Plan (2021) set out the requirement for Boroughs to engage in early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.

### **Key discussion points and outcomes**

- 4.362 During the Draft Local Plan consultation, National Grid submitted comment to identify electricity assets within the site allocations or in proximity. Newham initiated a discussion with them in October 2023 to understand the implications of the existing assets on site allocations. Newham agreed to update the local plan wording to flag the existing assets at the site and reiterate the requirement for early consultation with National Grid for relevant site allocations.

### Next steps

- 4.363 Newham will continue to consult National Grid to ensure the requirements set out in the Submission Draft Local Plan protect/provide utility infrastructure that can meet current and future needs.

### Sites

| Duty to Cooperate Bodies            |                     |
|-------------------------------------|---------------------|
| <b>Prescribed</b>                   | N/A                 |
| <b>Non-prescribed</b>               | LLDC, National Grid |
| Strategic Issues                    |                     |
| <b>1. Emerging site allocations</b> |                     |

### 1. Emerging site allocations

#### Background

- 4.364 As set out in [Chapter 3](#), the LLDC planning powers will return to Newham in December 2024. The adopted LLDC Local Plan contains 14 site allocations that are in Newham. The status of these sites is varies and we have worked closely with the LLDC Planning Policy team throughout the Local Plan Review to review and update these sites so that they continue, where appropriate, to be allocated in the Newham Local Plan.

#### Key discussion points and outcomes

##### *Issues and Options and Call for Sites*

- 4.365 A meeting with the LLDC Planning Policy team took place in September 2021 to discuss the Local Plan Review Issues and Options and the Call for Sites exercise. The approach to engaging with those in the LLDC area was discussed. It was agreed that the LLDC would support our engagement and would provide a Call for Sites submission for sites in their area.
- 4.366 We collaborated on wording about the LLDC transition to be included in our Local Plan consultation material and the LLDC Planning Policy team notified their consultation database about the Issues and Options and Call for Sites exercise in October 2021.
- 4.367 The LLDC submitted a Call for Sites submission in December 2021. This provided an update on the status on each site allocation, as well as submitted two sites where the LLDC have an interest in the land. These sites were considered in accordance with the methodology set out in the Site Allocation and Housing Trajectory Methodology Note.
- 4.368 Meetings were held with the LLDC Planning Policy team in June 2022. These meetings discussed how the Call for Sites submission was informing the preparation of site allocations and was used to share information about the status of sites and landowner intentions. This information sharing was on-

going and a site visit with the LLDC Planning Policy team to the sites took place in September 2022. A meeting took place in October 2022 to provide an update to the LLDC Planning Policy team on each site, how it was proposed to be taken forward and to flag changes from the adopted site allocations. The LLDC Planning Policy team gave an update on sites that had recently been given permission and an initial view on some of the sites. It was agreed that LLDC would submit formal comments on the sites at Regulation 18 and that this may include comments from LLDC as a landowner.

#### *Draft Local Plan Regulation 18*

- 4.369 The LLDC submitted a representation to the Draft Local Plan consultation as both the Local Planning Authority and to represent its interests as a landowner. The representation recognised the on-going engagement to date and supported the Draft Local Plan overall. The representation stated its aims were to achieve a smooth transition between the two plans and the approach to specific sites or locations.
- 4.370 The LLDC raised concerns that two site allocations (Three Mills Studio and Bows Good Yard) have been deleted without the planned development having come forward and that this will have specific consequences for what will and will not be acceptable from a land use and development point of view. The LLDC also raised concerns about the site allocation for Stratford Station and its alignment with the Stratford Station Business Case. They requested a further discussion on these sites.
- 4.371 A meeting was held with the LLDC Planning Policy Team in August 2023 to discuss the comments in their representation. The meeting clarified some of the LLDC's comments and continued the on-going information sharing about sites and their delivery status. It was agreed that we would continue to work through their comments on the site allocations and the issues relating to Bows Good Yard and Stratford Station would be dealt with at separate meetings.
- 4.372 We explained our view on the Three Mills Studio and that the same outcomes for enabling development could be achieved by applying the text in the neighbourhood policy. It was agreed that the LLDC would look at this text in more detail and further comments may be submitted at Regulation 19.
- 4.373 Please see sections on [Employment](#) and [Transport](#) for more detail on the Bows Good Yard and Stratford Station strategic issues respectively.

#### **Next steps**

- 4.374 We will continue to work with the LLDC to ensure a smooth transition between the LLDC Local Plan site allocations and the Newham Local Plan.

## Chapter 5: Next Steps

- 4.375 This Duty to Cooperate Statement is the first stage in Newham preparing a Statement of Common Ground (or Statements of Common Ground with more than one body, if required). Engagement with prescribed Duty to Cooperate and other public bodies during the Regulation 19 consultation will be maintained. This will include the finalisation of Statements of Common Ground, and this updated document will be made available alongside our examination documents submitted to be examined by the Inspector.

## Appendix 1: NHS Response

This appendix is supplementary response to the comments provided to us in response by the various NHS partners Healthy Urban Development Unit (HUDU), NHS North East London (NHS NEL) and the Newham University Hospital (NUH). These comments were submitted to us outside of the formal consultation period.

### **Building a Fairer Newham**

1. HUDU and NHS NEL suggested the inclusion of playing pitches and new health centres in policy BFN1. These suggestions were both added to BFN1.
2. In reference to BFN3, HUDU proposed the addition of improved health and community infrastructure, access to employment and training, and further infrastructure requirements to the Council's funding requirements. They also suggested a lower threshold of developments of 100+ homes for clause 4. These changes were not made as health infrastructure is already included under required infrastructure in clause 3. In addition, health provision must be considered in the round alongside other statutory and necessary infrastructure including education, transport. The threshold in part 4 reflects the capacity modelling that has informed planning for infrastructure. In broad terms sites at or below that density have been planned for. Greater densities will need further consideration of infrastructure. However, a wording change stating all developments in Newham should maximise social value was made.
3. NHS NEL proposed we reordered the points in the spatial strategy to prioritise green spaces. The spatial strategy was not reordered as the Plan and policy must be read as a whole. The inclusion of health facilities in BFN4 was raised by NHS NEL, however this wasn't added for the reasons outlined in the preceding paragraph.

### **Design**

4. HUDU and NHS NEL requested that the design policies require family housing to have access to open space, buildings risk assessment and management plan for suicide prevention, fireproofing of lifts and commented on the absence of climate adaptation and mitigation policy in D1. These points weren't implemented as they are already covered in Local policies H11.4 and D4.4 and the London Plan policy D12. However, policy D2 was amended to address climate adaptation and mitigation.

### **High Streets**

5. HUDU proposed that HS6 should be amended to 400m from schools rather than 200m. This amendment has been made to be consistent with the London Plan.
6. NHS NEL suggested that policy D6 should assess the carbon footprint of electronic advertising boards. No change was made due to limited research and low carbon standards for digital advertising.

## **Community Facilities**

7. The NUH made several suggestions to Community Facilities policy to recognise of lack of healthcare infrastructure within 15 minutes of residents, the importance of NUH to the social fabric of Newham, and the issue of a growing population on healthcare services. These additions weren't made, as the Local Plan has no spatial requirement for everyone to be within 15 minutes of a healthcare facility, and the Local Plan references growth, and the need for supporting infrastructure, throughout.

## **All About the Local Plan**

8. NHS NEL raised a matter in reference to the scope of 15-minute neighbourhoods. An explanation of what is meant by a well-connected network of neighbourhoods has been added to the Neighbourhoods chapter and spatial strategy.
9. Several other changes were suggested by NHS NEL including making the green agenda a central priority, the link between economic growth and health outcomes, current and future healthcare delivery, and healthcare infrastructure funding and expansion. None of these suggestions were added as many of them are incorporated elsewhere in the plan (the Green and Water Spaces and Climate Emergency chapters) and they are too specific to add to this section of the plan.

## **Vision and Objectives**

10. HUDU proposed wording changes to Objective 1 however this wording reflects the corporate plan, so the change has not been made.
11. HUDU and NHS NEL also suggested the inclusion of a baseline for health and wellbeing of residents and climate change to be mentioned more frequently and made more central to the Plan. These points are already covered in the corporate plan, the Vision and Objectives and throughout the Local Plan.

## **Housing**

12. HUDU and NHS NEL made several suggestions which were added to Housing policy including more evidence of long term care of residents to allow for more specialist housing, and to include healthcare facilities in the list of supporting infrastructure.
13. HUDU and NHS NEL also made suggestions to include adaptation plans for heat and flooding, sustainable transport access and more key worker housing provision. These points weren't added to housing policies as adaptation plans and access to sustainable transport are covered in the Climate Emergency and Transport policies. Additionally, there is no evidence key worker housing is a priority over social rent housing.

## **Inclusive Economy**

14. NHS NEL raised an issue concerning the wording of policy J4 and what requirements are compulsory and which are optional. This change has been made to ensure conformity with the Climate Emergency policies.

### **Green and Water Spaces**

15. Several points were raised by NHS NEL including the need to mention food forests in the hedgerow policy, the lack of understanding of the terminology “loose parts”, in reference to play facilities, and mention of sports pitches. Food forests were added to the implementation of GWS4, the term “opened ended play” was added to the term “loose parts” to explain this type of children’s play. Finally, a new clause on sports pitches was added to GWS2.
16. NHS NEL also made several points that weren’t added to policy including a lack of emphasis of food growing within urban greening policy, lack of acknowledgement of allotment waiting lists and solutions and lack of focus on play areas with access to nature for children. As it was considered that the justification and implementation texts for these policies adequately addressed these points.

### **Climate Emergency**

17. NHS NEL raised several points which weren’t implemented, including a request to reference the increasing risk of food insecurity due to the climate crisis, as this falls outside the scope of climate emergency policies; similarly the point that policy CE6 neglects to mention air quality in active travel infrastructure wasn’t added, as it is addressed throughout the transport policies.

Appendix 2: Statement of Common Ground on Strategic Matters between  
London Borough of Barking & Dagenham and London Borough of Newham  
(2021)